

MONA OFFSHORE WIND PROJECT





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Appendix D: Statutory Consultation

D.25. Summary of Responses to Statutory consultation and applicant regard





D.25.1 Overarching consultation process and non-technical comments table of responses



Table D.25. 1: Overarching consultation process and non-technical comments table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_001_001_190423	S44	Email	Request for a paper copy of the following: Work Plans onshore Sheet 12 which is pg 15 of the document Sheet 13 which is pg 16 of the document Sheet 14 which is pg 17 of the document Sheet 16 which is pg 19 of the document Sheet 17 which is pg 20 of the document Outline code of construction pg 7 drawing ref 12079-0334-02	Request acknowledged. Printed plans and maps delivered to consultee's home address on 04/05/23.	No
Mon_002_001_190423	S42/S44	Email	I have been asked to clarify whether it is you that has booked the Cefn Meiriadog Community Hall for 20th May 2023 for an event? Also, what input you may need at this point from the LPA.	Confirming that Cefn Meiriadog Community Hall was used for a consultation event on 20/5/23. Engagement remains ongoing with the LPA throughout, and following, statutory consultation process.	No
Mon_001_001_190423	S44	Email	Looks like we 'personally' have been well and truly stuffed by this project as we are slap bang in the middle of everything whichever onshore substation is chosen. We sit in work area 12d and in extreme close proximity to work area 16a and identified as High impact area for noise etc etc, therefore our property will be uninhabitable. Given thats the case can you advise what options are available to us as I am at a loss of where to turn to.	There has been ongoing and regular engagement with this consultee. A meeting with the project team was organised at the consultee's home address and was held on 19/5/23 as a direct response to this feedback being received. Engagement continues at the time of writing.	No
Mon_003_001_200423	S47	FREEPOST	Request for printed materials - brochure, feedback form	The Applicant notes your response. Requested materials sent.	No
Mon_004_001_210423	S47	Email	We haven't had a notification email through for Mona in respect of the public consultation exercise. We have had Morgan through, but I want to confirm if the TSC is being considered as a statutory consultee for Mona, as we have been for Morgan. I have drawn all attention to the fact that the consultation has commenced however, if you send the email through please, it would be really helpful to keep a track of the Mona consultation too.	Response to email sent by Mona Offshore Wind Project Stakeholder Engagement Lead clarifying notification had been sent. Subsequently located by consultee who confirmed receipt.	No
Mon_005_001_210423	S44	Email	Confirmed attendance at one of the consultation events but would prefer to discuss in private at the property. Also mentioned issues when calling Dalcour Maclaren and not knowing where to transfer the call to.	There has been ongoing and regular engagement with this consultee. A meeting with the project team was organised at the consultee's home address was held on 19/5/23 as a direct response to this feedback being received. Engagement continues at the time of writing.	
Mon_006_001_210423	S47	Email	Accepted promoting engagement through offering of library space for exhibit information and promotion through social media platforms.	Noted. Requested materials sent.	No
Mon_008_001_240423	S44	Email	Confirmed meeting prior to the Bodelwyddan event on Friday the 19th of May.	There has been ongoing and regular engagement with this consultee. A meeting with the project team at the consultee's home address was held on 19/5/23 as a direct response to this feedback being received. Engagement continues at the time of writing.	No
Mon_011_001_250423	S47	Email	You ask for our feedback and thoughts but it is just window dressing. This project will go ahead with our without the public's opinion being taken into account. Absolutely nothing is being done to promote tidal energy, It's not even given a mention when green alternatives are talked about in the media or even by the government. Solar, wind even nuclear are touted as alternative green energies. The sea goes in and out everyday come wind, rain or	The Applicant is a responsible developer committed to operating as part of the North Wales community for many decades to come. Statutory consultation is a key part of the planning process, one which the applicant takes seriously to	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			shine, therefore not at the mercy of the elements. Reliable clean energy which, for whatever reason, is not even considered. It makes my blood boil so I suppose helps with green energy as I don't need any central heating!!	engage and understand community views. The Applicant has submitted a Consultation Report (Document reference E3) that explains how the Applicant has complied with the pre-application consultation requirements set down in the Planning Act 2008 and had regard to all the feedback submitted.	
Mon_013_001_190423	S47	Email	We are a small charity run by volunteers. As such, I feel this does not apply to us, and we consider ourselves not to be a consultee on this matter.	The Applicant notes your response.	No
Mon_015_001_210423	S42/S44	Email	Requested an extension of time to respond to the consultation, suggested 23 June 2023	Extension granted. Feedback submitted 16/6/23	No
Mon_016_001_230423	S47	Email	Requested consultation notes.	Responded to clarify which materials were required.	No
Mon_015_001_240423	S42/S44	Email	We are having difficulty plotting the site area (Mona Offshore Wind Project Onshore Order Limits) highlighted in red on your consultation location plans on our GIS. Please could you provide us with a digital copy of this site area in the form of an ESRI Shapefile or MapInfo TAB file so we can digitise it. This will enable us to carry out a spatial search of the area, as part of our consultation response.	This request was actioned. There is ongoing correspondence between consultee and Applicant.	No
Mon_017_001_270423	S42	Email	The Isle of Anglesey Public Protection department acknowledges receipt of the Mona Offshore Wind Project consultation notification. However, upon reviewing the documentation via the portal, it would appear that the project's landfall is around the Abergele area. Therefore, the Public Protection department would have no comments or observations to make that would be relative to this proposal.	The Applicant notes your response.	No
Mon_018_001_270423	S47	Email	Confirmed request for consultation brochure.	Consultation materials sent 28/4/23	No
Mon_022_001_030523	S42	Email	Town Council feedback, is No Objection	The Applicant notes your response.	No
Mon_015_001_040523	S42/S44	Email	I hope to attend the meeting on the 9th but will have to leave for another meeting at 4pm. Please send an invitation to me.	Noted. Consultee registered for webinar and joining link issued	No
Mon_015_002_040523	S42/S44	Email	Requested details for joining a meeting	Noted. Consultee registered for webinar and joining link issued	No
Mon_024_001_050523	S42	Email	Confirming attendance at briefing on behalf of Gwynedd Council's Local Planning Authority	The Applicant notes your response.	No
Mon_025_001_050523	S47	Email	Raised issues with accessing the website and speaking to someone on the phone.	Website checked and no issues were found.	No
Mon_027_001_070523	S47	Email	Requested a copy of the PEIR document.	Response issued 15/05/23. Consultee subsequently attended a consultation even in Ramsey 18/05/23 and was given an opportunity to review the PEIR and speak to members of the Applicant's team. It was highlighted that a full copy of the PEIR was on deposit at the same venue for the duration of the consultation, and that the PEIR was available online and on USBs being distributed at the event.	
Mon_028_001_080523	S44	Email	USB had no files on it - requested another to be sent out.	Acknowledged. The project engaged in ongoing conversations with consultee, including during subsequent attendance at consultation event held at Cefn Meiriadog, where they received another USB.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_030_001_090523	S44	Email	Requested date, times and locations of planned events.	Consultee attended and took an active part in the Project's webinar, which was held on 9/05/23. Information about events was included within that webinar and the consultee sent another email the next day saying he found the webinar informative. He went on to provide feedback as part of the consultation process	No
				Following the statutory consultation, the Onshore Cable Corridor has been refined to deselect options along the Onshore Cable Corridor and to reduce the width of the corridor. The refinement process was informed by comments received during the consultation process and by engineering design. The refined Onshore Cable Corridor is now further away from Tan-y-Myndd Trout Fishery Ltd.	
Mon_015_001_090523	S42/S44	Email	Requested a meeting invite.	Noted. Consultee was manually registered for the webinar and a joining link issued	No
Mon_032_001_090523	S42	Email	Notified unable to attend project briefing for LPAs	The Applicant notes your response.	No
Mon_033_001_090523	S44	Email	Requesting material	The Applicant discussed matters with consultee during phone calls on 12/5/23 and 15/12/23	No
Mon_034_001_110523	S47	Email	Opposing development: We currently have a huge number of wind turbines already situated off the north Wales coast. No benefits to the local population in regard to discounted utility bills. As we are suffering the visual impact we should be compensated through discounted bills.		No
Mon_035_003_120523	S44	Email	Notification of intent to submit a follow up letter.	The Applicant notes your response.	No
Mon_038_001_190523	S42	Email	Chasing up a response for a request for information from 09/05/2023.	Information issued as requested 24/5/23	No
Mon_041_001_260523	S42	Email	I have checked the site location plan against the information held by the Coal Authority and can confirm that the majority of the proposed development site is located outside of the defined coalfield, with a small part of the site located on the coalfield, but outside the Development High Risk Area as defined by the Coal Authority.	The Applicant notes your response.	No
Mon_042_002_260523	S42	Email	Email to provide attached response on consultation	The Applicant notes your response.	No
Mon_042_003_260523	S42	Email	We are writing on behalf of Awel y Môr Offshore Wind Farm Limited as the applicant of the Awel y Môr Offshore Wind Farm (AyM OWF) project in relation to the notification received from Mona Offshore Wind Limited (MOWL) on the 19 April 2023, regarding outline proposals for the development of the Mona Offshore Wind Project (MOWP). As detailed in that communication, we have been identified under Section 42 of the Planning Act 2008 as a statutory consultee for the MOWP and this letter lays out our response.	The Applicant notes your response.	No
Mon_042_006_260523	S42	Email	There are a small number of matters which we wish to engage further on with MOWL, as listed below. We seek to continue our engagement with MOWL throughout the preapplication process and on any subsequent application and to maintain co-operation between the two projects.	Noted. Engagement between consultee and Applicant remains ongoing	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_042_014_260523	S42	Email	Volume 1, Chapter 3 - As mentioned previously, AyM OWF continues to regularly engage with MOWL regarding interactions such as project boundaries, construction programmes and infrastructure location and will continue work to minimise impacts where possible on local residents and the wider area.	Noted. Engagement between consultee and MOWL remains ongoing	No
Mon_047_001_300523	S42/S44	Email	Email providing attached consultation response from NGETs	The Applicant notes your response.	No
Mon_047_002_300523	S42/S44	Email	I refer to your notice dated12th April 2023 regarding the Proposed Development. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).	The Applicant notes your response.	No
Mon_047_004_300523	S42/S44	Email	Where the Promoter intends to acquire land, extinguish rights, or interfere with or work within close proximity to any of NGET's apparatus land and interests, this will require appropriate protection and further discussion on the impact to its apparatus and rights.	The Applicant has included protective provisions for the protection of National Grid in the draft DCO.	No
Mon_047_005_300523	S42/S44	Email	National Grid Electricity Transmission has high voltage electricity overhead transmission lines, cables and substation swithin or in close proximity to the order boundary. The overhead lines, cables and substations form an essential part of the electricity transmission network in England and Wales.	The Applicant notes your response.	No
Mon_047_006_300523	S42/S44	Email	Substation•Bodelwyddan400kV Sub Station• Associated overhead and underground apparatus including cables	The Applicant notes your response.	No
Mon_047_007_300523	S42/S44	Email	Overhead Lines4ZB 400kV OHL Bodelwyddan -Deeside -Pentir 1Bodelwyddan -Deeside -Pentir 2GM Route 400kV OHL Bodelwyddan -Deeside -Pentir 2Associated cable fibre	The Applicant notes your response.	No
Mon_047_008_300523	S42/S44	Email	Cable Apparatus•Pentre-Mawr Cable Compound•Deeside -Pentir 1 Cable•Bodelwyddan4 St Asaph 132kv Cable Sections 01 And 02	The Applicant notes your response.	No
Mon_047_009_300523	S42/S44	Email	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	The Applicant has included protective provisions for the protection of National Grid in the draft DCO.	No
Mon_047_012_300523	S42/S44	Email	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.	The Applicant notes your response.	No
Mon_047_018_300523	S42/S44	Email	I hope the above information is useful. If you require any further information, please do not hesitate to contact me. In the meantime, we look forward to receipt of further information and consultation relating to potential impacts on our assets, The information in this letter is provided not withstanding any discussions taking place in relation to connections with electricity customer services.	The Applicant notes your response.	No
Mon_050_001_310523	S42	Email	Mona Offshore Wind Project - Generation and Transmission Assets Thank you for your email dated 19th April 2023 inviting comments on the Preliminary Environment Information Report (PEIR) for the proposal to construct and operate Mona Offshore Wind Project generation assets.	The Applicant notes your response.	No
Mon_051_001_310523	S42	Email	Thank you for your letter dated 20 April 2023, notifying the Marine Management Organisation (MMO) of bp Alternative Energy Investments Limited's intention to submit an application for development consent under the Planning Act 2008 (the "2008 Act") to build an offshore wind farm (OWF) with up to 107 turbines, generating around 1.5 gigawatts (GW) of electricity.	The Applicant notes your response.	No





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Mon_051_002_310523	S42	Email	The MMO was established by the Marine and Coastal Access Act 2009 (the "2009 Act") to make a contribution to sustainable development in the marine area, and to promote clean, healthy, safe, productive and biologically diverse oceans and seas. The responsibilities of the MMO include the licensing of construction works, deposits and removals in English inshore and offshore waters and for Welsh and Northern Ireland offshore waters by way of a marine licence1. Inshore waters include any area which is submerged at mean high water spring (MHWS) tide. They also include the waters of every estuary, river or channel where the tide flows at MHWS tide. Waters in areas which are closed permanently or intermittently by a lock or other artificial means against the regular action of the tide are included, where seawater flows into or out from the area. In the case of Nationally Significant Infrastructure Projects (NSIPs), the 2008 Act enables Development Consent Order's (DCO) for projects which affect the marine environment to include provisions which deem marine licences2.	The Applicant notes your response.	No
Mon_051_003_310523	S42	Email	As a prescribed consultee under the 2008 Act, the MMO advises developers during preapplication on those aspects of a project that may have an impact on the marine area or those who use it. In addition to considering the impacts of any construction, deposit or removal within the marine area, this also includes assessing any risks to human health, other legitimate uses of the sea and any potential impacts on the marine environment from terrestrial works. Where a marine licence is deemed within a DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement and revocation of provisions relating to the marine environment. As such, the MMO has a keen interest in ensuring that provisions drafted in a deemed marine licence (dML) enable the MMO to fulfil these obligations. Further information on licensable activities can be found on the MMO's website3. Further information on the interaction between the Planning Inspectorate and the MMO can be found in our joint advice note4.	The Applicant notes your response.	No
Mon_051_005_310523	S42	Email	The MMO has reviewed the consultation documents received 19 April 2023 and sets out our initial comments below. The MMO reserves the right to make further comments on the Project throughout the pre-application process and may modify its present advice or opinion in view of any additional information that may come to our attention.	The Applicant notes your response. Received.	No
Mon_051_038_310523	S42	Email	Conclusion The MMO welcomes the progress bp Alternative Energy Investments Limited has made to date to assess the environmental impacts of the Mona Offshore Wind Farm project. However, the MMO requires the points raised in this response to be addressed within the ES.	The points raised by the MMO have been considered in the Environmental Statement. Responses to the comments are provided in this report and responses to technical comments are also responded to and addressed with the relevant chapters of the Environmental Statement and supporting documents.	No
Mon_052_001_010623	S44	Email	Thank you for your letters of 17th April (Interest 185544) and 22nd May (Interest 204269) regarding the Section 42 PIL for the proposed Mona Windfarm. Further to your 17th April letter I was very pleased to participate in the Mona webinar on 9th May. I found the webinar informative and it helped me further my understanding a little better of the process you are going through to obtain the necessary consents and permissions to build the windfarm and its support infrastructure.	The Applicant notes your response.	No
Mon_054_001_010623	S42/S44	Email	Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales (NRW) on the Preliminary Environmental Information Report (PEIR) for the Mona Offshore Wind Farm, received on 19th April 2023.	The Applicant notes your response.	No
Mon_054_022_010623	S42/S44	Email	NRW Marine Licensing Regulatory Comments: NRW Permitting Service provide advice on the Marine Licensing Process, draft DCO and deemed Marine Licence.	The Applicant notes your response	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_060_001_010623	S42	Email	Thank you for consulting JNCC on the Mona Offshore Wind Limited, Section 42 Statutory Consultation on the Preliminary Environmental Information Report, which we received on 19 April 2023.	The Applicant notes your response.	No
Mon_060_002_010623	S42	Email	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.	The Applicant notes your response.	No
Mon_060_003_010623	S42	Email	The advice below relates to: •Benthic Ecology•Marine Mammals•Marine Ornithology	The Applicant notes your response.	No
Mon_060_004_010623	S42	Email	Documents reviewed Mona Offshore Wind Project Preliminary Environmental Information Report Non-Technical Summary, Rev 03, dated 06/03/2023 Volume 1, chapter 1: Introduction, Rev 04, dated 03/02/2023Volume 1, chapter 2: Policy and legislation, Rev 03, dated 16/12/2022Volume 1, chapter 3: Project description, Rev 04, dated 15/02/2023Volume 1, chapter 4: Site selection and alternatives, Rev 02, dated 15/03/2023Volume1, chapter 5: Environmental Impact Assessment methodology, Rev 03, dated 10/02/2023 Volume 2, chapter 7: Benthic subtidal and intertidal ecology, Rev 04, dated 19/01/2023Volume 2, chapter 6 Physical processes, Rev 04, dated 04/03/2023Volume 2, chapter 9: Marine Mammals, Rev 03, dated 27/01/2023Volume 2, chapter 10: Offshore ornithology, Rev 03, dated 16/12/2022 Volume 2, chapter 15: Inter-related effects (offshore), Rev 04, dated 01/03/2023 Volume 5, annex 3.1: Underwater sound technical report, Rev 04, dated 24/01/2023Volume 5, annex 5.1: Cumulative effects screening matrix, Rev 03, dated 17/02/2023Volume 5, annex 5.2: Transboundary impacts screening, Rev 03, dated 03/03/2023 Volume 5, annex 4.1: Site Selection Area of Search Identification, Rev 02, dated 14/03/2023 Volume 6, annex 6.1: Physical processes technical report, Rev 03, dated 01/12/2022Volume 6, annex 10.1: Offshore ornithology baseline characterisation, Rev 04, dated 01/12/2022Volume 6, annex 10.3: Offshore ornithology in on-migratory seabird collision risk assessment, Rev 03, dated 01/12/2022Volume 6, annex 10.3: Offshore ornithology non-migratory seabird collision risk assessment, Rev 03, dated 01/12/2022Volume 6, annex 10.6: Offshore ornithology cumulative effects assessment population viability assessment technical report, Rev 03, dated 06/12/2022 Volume 6, annex 10.6: Offshore ornithology cumulative effects assessment population viability assessment technical report, Rev 03, dated 06/12/2022 Volume 6, annex 10.6: Offshore ornithology cumulative effects assessment population viability assessment technical report, Rev 03, dated 06/03/20	The Applicant notes your response.	No
Mon_066_033_020623	S42	Email	Due to the high quantity of large documents submitted as part of the PEIR and due to multiple Round 4 PEIR consultations happening concurrently, we have had to prioritise The Morgan and Morecambe Generations Assets PEIR review as these occur entirely within English waters and therefore entirely within Natural England's remit. We therefore reserve the right to provide further advice and highlight that agreement is not to be assumed where no comment is made. The following documents have been considered:	The Applicant notes your response.	No

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Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_066_034_020623	S42	Email	Volume 1: Introductory Chapters•Volume 2: OffshoreChapters•Volume 5:Introductory Annexes•Volume 6: Offshore Annexes •Volume 5: Non-Technical Summary•Statutory Consultation Materials Overview Comments Natural England's Remit Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England's remit covers England and English waters out to 12 nautical miles. Pursuant to an authorisation made on the 9th December 2013 by the JNCC under paragraph 17(c) of Schedule 4 to the NERC Act 2006, Natural England is also authorised to exercise the JNCC's functions as a statutory consultee in respect of applications for offshore renewable energy installations in offshore waters (12-200nm) adjacent to England. We have focused our comments in our response to the Mona Offshore Wind Farm (OWF) PEIR within the remit of English inshore and offshore waters, and defer to Natural Resources Wales (NRW) and JNCC for advice within their remits.	The Applicant notes your response.	No
Mon_066_035_020623	S42	Email	Evidence Plan Process Natural England recognises the importance of the pre-application stage of the consenting regime, and we welcome the opportunity to engage at this stage. As such we seek to make this process as effective as possible. We have provided advice previously in our response to the Environmental Impact Assessment Scoping Report (1 June 2022). Since Scoping, Natural England has been engaging in the Applicant's Evidence Plan Process (EPP) and Natural England has attended the majority of the Expert Working Group (EWG) meetings.	The Applicant notes your response.	No
Mon_066_042_020623	S42	Email	Natural England has also produced terrestrial guidance 'Developers: get environmental advice on your planning proposals' which is also relevant to the onshore transmission assets for offshore windfarms please follow the links to our standard advice.	The Applicant has noted your response	No
Mon_066_061_020623	S42	Email	If you have any queries relating to the content of this letter, please contact me using the details provided below.	The Applicant notes your response.	No
Mon_067_001_030623	S42/S44	Email	We note that you are currently undertaking public consultation on the proposed Mona Offshore Wind Nationally Significant Infrastructure Project (NSIP). This letter constitutes Scottish Power Renewables (WODS) Limited's (SPRWoDS) response to that consultation.	The Applicant notes your response.	No
Mon_067_002_030623	S42/S44	Email	SPRWoDS is one of the owners of the West of Duddon Sands Offshore Windfarm (WoDS). WoDS is an NSIP for which development consent was granted in September 2008. The Order grants consent for electricity generation with an installed capacity of up to 500 MW. Given this, SPR WoDS would request that both it and Morecambe Wind Limited (as the operator of WoDS) are each treated as Interested Parties and included in all future consultations in relation to this project.	The Applicant notes the response. The Applicant has met with WoDS since the PEIR consultation. Registration as an Interested Party must be pursued via the Planning Inspectorate during the registration period.	No
Mon_067_004_030623	S42/S44	Email	Due to the close proximity of the proposed development project, SPR WoDS initial comments in response to the statutory consultation are described below	The Applicant notes your response.	No
Mon_067_007_030623	S42/S44	Email	SPR WoDS recognises the importance of the proposed works and the contribution the project will have in meeting the national need for renewable energy. We are keen to engage with Mona Offshore Wind and would welcome constructive discussions around the issues noted above and any other emerging topics that arise.	The Applicant notes your response.	No
Mon_067_008_030623	S42/S44	Email	It is requested that Mona Offshore Wind liaise with us through Marc Alonzi, (REDACTED). Please do not hesitate to contact us for further discussion or information requests.	The Applicant notes your response.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_069_001_010623	S42	Email	This response has been prepared by the Isle of Man Government (identified as a statutory consultee) with the opportunity to review and comment on the Preliminary Environmental Information Report (PEIR). This letter is a response from the Territorial Sea Committee (TSC) made up of representatives of a number of Departments and Statutory Boards of the Isle of Man Government.	The Applicant notes your response.	No
Mon_069_002_010623	S42	Email	The TSC found it a useful and interesting document and await the associated 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 in this process given the proximity to the Manx territorial limits. Thank you for affording us with the opportunity to consider, and provide comments on the above.	Noted. The Isle of Man Government and the island's communities / elected representatives have been, and will continue to be, engaged by the Applicant.	No
Mon_069_016_010623	S42	Email	In addition to this broad statement, the TSC has provided specific comments, over subsequent pages, in relation to the individual chapters of the PEIR, and collated on behalf of various contributors within the responsible Departments of the Isle of Man Government.	The Applicant notes your response.	No
Mon_069_017_010623	S42	Email	The TSC would welcome the opportunity for continued involvement in the process.	Noted. The Applicant has always included and will continue to include the Isle of Man Government / Territorial Seas Committee in its consultations.	No
Mon_069_018_010623	S42	Email	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.	The Applicant notes your response.	No
Mon_069_019_010623	S42	Email	Detailed analysis of PEIR with specific comments from respective Departments: (Highlighted sections identify particular areas of text which have been considered further). Should you require any further clarification on any of these sections, please do not hesitate to contact us.	The Applicant notes your response.	No
Mon_070_001_010623	S42	Email	The Isle of Anglesey County Council (the Council) confirms that it has had the opportunity to review the Preliminary Environmental Information Report (PEIR) for the Mona offshore wind farm project.	The Applicant notes your response.	No
Mon_070_002_010623	S42	Email	The Council's Energy Island Programme is in place to ensure that Anglesey can be exemplar in the transition to a prosperous and resilient low carbon economy, providing high quality jobs, education and supply chain opportunities, whilst protecting and enhancing the natural environment and enabling the Welsh Language and culture to thrive in vibrant communities.	The Applicant notes your response.	No
Mon_070_003_010623	S42	Email	The Council is therefore supportive of low carbon developments providing that they are sustainable in form and that local benefits including opportunities for local employment, skills enhancement and supply chain are maximised and realised.	The Applicant notes your response.	No
Mon_070_004_010623	S42	Email	The Council wish to provide the following comments in order to facilitate the preparation of the final Environmental Statement (ES) that will support the application for Development Consent Order (DCO).	The Applicant notes your response.	No
Mon_070_086_010623	S42	Email	I hope that the above advice is of assistance to you and will be fully taken into consideration in the finalisation of the Mona Project DCO application. In the meantime, should you wish to discuss our advice please do not hesitate to contact Iwan W Jones, Lead Officer Major Projects (REDACTED)	The Applicant notes your response and thanks the consultee	Yes
Mon_071_001_020623	S42	Email	We write on behalf of Morecambe Offshore Wind Ltd, the holder of the Generation Licence and the relevant consents for the West of Duddon Sands Windfarm ("West of Duddon Sands"), a joint Scottish Power Renewables and Orsted venture in response to your	The Applicant notes your response.	Yes





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			notification of a proposed application for a development consent order ("DCO") under section 48 of the Planning Act 2008.		
Mon_071_002_020623	S42	Email	We write to register with you our interest in your proposal and in particular areas of potential interaction between your proposed development and West of Duddon Sands. Our response at this stage is based on documents currently made available regarding your project and our response will develop as more information is made available including during application and examination stage and as we further consider the potential interaction between the projects.	The Applicant notes your response.	Yes
Mon_071_003_020623	S42	Email	We are also engaging on the proposed Morgan and Morecambe wind farms and intend also to engage on the proposed Morgan and Morecambe Transmission Assets during statutory consultation.	The Applicant notes your response.	Yes
Mon_071_004_020623	S42	Email	Please can all responses to this representation be sent to REDACTED via the email address REDACTED.	The Applicant notes your response.	No
Mon_071_005_020623	S42	Email	Introduction: Interaction between West of Duddon Sands and the Mona Offshore Wind Project West of Duddon Sands West of Duddon Sands is an operational offshore wind farm with capacity of 389 MW and 108 wind turbine generators. West of Duddon Sands holds a lease from the Crown Estate and operates pursuant to the below consents.	The Applicant notes your response.	Yes
Mon_072_001_010623	S47	Email	Attachments have been added to this submission as supporting annexes and should be considered part of it.	Noted. Attachments received.	No
Mon_073_001_010623	S42	Email	This advice is given in response to the Preliminary Environmental Information Report prepared for the Mona Offshore Wind Project.	Noted	No
Mon_085_001_040623	S47	Email	1. Consultation inadequate in relation to the large-scale impact of the project on the community. Many local residents remain unaware of the project and its scale and timing and the locations affected. Flier distributed to households unfit for purpose - readability poor due to design, especially for visually-impaired people.	Noted. The Applicant undertook a significant amount of publicity to ensure local people were aware of, and could take part in, the consultation. This included 38,100 postcards distributed to homes and businesses. While there was a significant amount of information about the consultation included on the postcard, the Applicant believes this information was displayed in an accessible manner. The Applicant also invited people who required the consultation brochure, or any of our other materials, in a more accessible format to contact them by phone or email.	
Mon_088_001_040623	S42	Email	We welcome this opportunity to consult on the proposal at this early stage of its development. These comments are intended to be constructive, and WTW welcomes further engagement as the consenting process progresses to ensure that the development takes place using the right technology, in the right place and making a positive contribution to natures recovery at sea.	Noted. The Applicant will continue to engage Wildlife Trust Wales.	No
Mon_088_002_040623	S42	Email	The Royal Society of Wildlife Trusts (RSWT), which includes WTW, are a movement of 46 independent Wildlife Trusts covering the UK, 5 of which are located in Wales. RSWT is the largest UK voluntary organisation dedicated to conserving all the UK's habitats and species both in the terrestrial and marine space. Our seas need to be managed in order to enable them to recover from anthropogenic damage, and, create resilient ecosystems. This will ensure that the demands for resources and energy at the scale necessary to deliver the UK	The Applicant notes your response.	No





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			Governments ambitions can be met without deleterious environmental impact and disturbance to marine habitats and species.		
Mon_088_003_040623	S42	Email	The Mona OWF development is of interest to the WTW because it is predominantly located in waters that the sustainable use of which are governed by policy set out in the Welsh National Marine Plan.	The Applicant notes your response. Following the announcement of post-consultation design refinements, it has been confirmed that the revised array for the Mona Offshore Wind Project now lies wholly in Welsh waters.	No
Mon_088_004_040623	S42	Email	There is an opportunity for well-planned offshore wind development to protect the environment through the sensitive location and design of infrastructure. Implementation of appropriate mechanisms designed in collaboration with conservation organisations and statutory bodies responsible for the management of MPAs, to support and deliver enhancements for biodiversity and improvements in the management and condition of these important sites and the features for which they are designated.	The Applicant notes your response.	No
Mon_089_001_020623	S42	Email	We write on behalf of Orsted Isle of Man (UK) Limited ("Orsted") the developer of the proposed Isle of Man Offshore Windfarm, in response to your notification of a proposed application for a development consent order ("DCO") under section 48 of the Planning Act 2008.	The Applicant notes your response.	Yes
Mon_089_002_020623	S42	Email	We write to register with you our interest in your proposal and in particular areas of potential interaction between your proposed development and the Isle of Man Offshore Windfarm. Our response at this stage is based on documents currently made available regarding your project and our response will likely develop as more information is made available including during application and examination stage and as we further consider the potential interaction between the projects.	The Applicant notes your response.	No
Mon_092_001_240423	S44	Phone	Requested Mona PEIR on usb.	USB issued by Applicant to consultee.	No
Mon_092_002_240423	S44	Phone	Has concerns about the removal of hedges, disturbing of animals including slow worms, and general environmental impacts of the project. He has been in touch with his councillor Councillor Martyn Hogg about this and he shares his concerns and will be responding to the consultation.	The applicant thanks the consultee for its detailed comments on the onshore ecology and recognises the importance of the queries raised. Detailed assessment of impacts and the Applicants approach to managing and mitigating any potential impacts tis provided in Volume 3, Chapter 3 Onshore Ecology of the Environmental Statement. The Applicant has undertaken ongoing conversations with this consultee via email and consultation events to aim to resolve outstanding queries.	No
Mon_094_001_200423	S44	Phone	Requested a call back from Dalcour MacLaren, they have been in touch with him	Noted. Contacted by Dalcour Maclaren (lands) and enquiry resolved.	No
Mon_095_001_200423	S47	Phone	Requested a call back to understand why we had sent her materials, family member/friend will be submitting feedback on her behalf. Address and surname is inaudible.	Comment addressed through discussion. No further action required.	No
Mon_096_001_210423	S47	Phone	Requested brochure, NTS and feedback form	Materials requested were issued by Applicant to consultee 24/4/23	No
Mon_097_001_240423	S47	Phone	Called back, said he only received Welsh materials and didn't understand why we were in contact. Offered to send English materials if interested, said "don't bother".	Closed. No action required.	No





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Mon_098_001_250423	S47	Phone	Wanted to give verbal feedback - Applicant confirmed formal feedback needed to be submitted in writing and he said he would visit the website.	Closed. No further action required.	No
Mon_099_001_260423	S44	Phone	Wanted to let us know that the paperwork and postcard we sent him was very unclear, wanted to know if cable routes were firmed up and how the events worked. Said that as nothing has been decided he doesn't need to come to events. Dalcour MacLaren have been to see him.	Closed. No further action required.	No
Mon_100_001_270423	S47	Phone	Wanted to let us know that the bilingual postcard was very unclear, that we should prioritise English speakers living in Wales, that the signs put up by DM are too small, that the projects are too big and that having the consultation events listed online instead of on the postcard was inaccessible for the older generation.	Noted. No action required.	No
Mon_101_001_270423	S47	Phone	Wanted to know what she would be seeing from the Isle of Man. pointed her to the PEIR, which has visualisations in chapter 15.3. She was also wondering what specific benefits the farm would have for the Isle of Man.	The Applicant discussed matters with consultee during phone call and directed consultee to the PEIR, which had visualisations in chapter 15.3. No further action required.	No
Mon_102_001_280423	S47	Phone	He wanted to know about public events but he's now seen the list. He has doubts about how genuine the consultation is and whether there's any point in feeding back "again". He claimed that somebody has visited a neighbour of his and has confirmed that we've already decided on a substation location. He claims that we have dismissed all possible substation sites in favour of greenfield sites, just because it's "easier".	The Applicant discussed matters with consultee during phone call. Statutory consultation is a key part of the planning process, one which the applicant takes seriously to engage and understand community views. A detailed explanation of the site selection process for the onshore substation is included within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4); including a summary of the non-statutory and statutory consultation events that were held to inform the process.	No
Mon_103_001_020523	S47	Phone	Wanted information about the event in St Asaph.	Information provided to consultee. No further action required.	No
Mon_104_001_230523	S47	Phone	Queried why there was no deposit location in St Asaph. Suggested we should have tried the Springfield Gardens Caravan Park or the Cricket Club which both had rooms to rent.	The Applicant discussed matters with consultee during phone call and explained that efforts had been made to secure a suitable location but weren't successful. In addition, it was a challenge to find a location willing to host printed materials for the whole of the consultation period without a member of the project team present.	No
Mon_105_001_010623	S47	Phone	Wanted to know if she should email her feedback in or if there was a way to do it online, also wanted to know if there were any more consultation events as she was unable to make them.	The information was provided to the consultee. No further action required.	No
Mon_108_002_010623	S44	Feedback form	Q4 (Do you have any comments / feedback on how we have understood the technical and environmental constraints of the areas offered to us by the Crown Estate as part of its leasing process)- Too Complicated - needs to be simplified	The Applicant has included a Non-Technical Summary which simplifies the Environmental Statement (Document Reference F1).	No
Mon_108_004_010623	S44	Feedback form	Q9 (Do you have any other comments / feedback on the project, including any other information provided as a part of this consultation) - see attached letter	Content of the letter included in responses Mon_108_004_010623 to Mon_108_012_010623.	No





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Mon_109_001_250423	S47	Phone	Stuart began by explaining he has been involved in economic development in Cumbria for 40 years, including with the Local Enterprise Partnership and local authority, and was engaged with the Morecambe gas projects, and with Ørsted on the Walney Offshore Wind Farm(s).	The Applicant notes your response.	No
Mon_109_004_250423	S47	Phone	He's also keen for local suppliers to engage with the projects and suggested that a meet the supplier event in Cumbria at an appropriate time would be a good idea, noting that the Walney one he was involved with attracted 200+ attendees.	The Applicant notes your response.	No
Mon_115_001_000623	S44	Email	1. Public consultation has been inadequate. The cards distributed by post and/or hand notifying people of the Community Consultations were visually confusing and difficult to read. The actual meetings were not listed and people had to go online to find out locations and times. Not everyone is computer literate. Hard copies of the feedback forms are not available within the community or in the library in St Asaph.	Noted but the Applicant does not agree. Significant levels of promotion was undertaken both online and offline. Hard copies of feedback forms were available from the Applicant and were being posted on request. A consultation event was held in St Asaph where a range of consultation materials, including feedback forms, were available.	No
Mon_115_001_000623	S44	Email	2. The impression given from the Community Consultations is simply one of the developer going through the motions, a tick-box exercise to show that Community groups have been consulted with no genuine feeling for how the Community will be impacted. As a community it feels as if we are being steam rollered by a colossal infrastructure development. Given that, I wonder what influence do public responses to these Consultations actually have?	Noted but the Applicant does not agree. Two non statutory consultation and statutory consultation were all delivered. All feedback received has been considered. Feedback from non-statutory consultation events has been collated and presented in the Consultation Report supplementing the application for consent.	No
Mon_115_002_000623	S44	Email	3 More transparency and clarity are needed. People are poorly informed, this extends beyond residents to the Community and County Councils. There are many people in the area who are still not aware of the magnitude of the Mona project, some are even unaware it is happening at all	Noted. The Applicant undertook significant levels of advertising and promotion to ensure local people were aware of the consultation and understood how to take part. This included local media advertising (online and offline) and mailing of 30,800 postcards to residential and business addresses in the primary consultation zone.	No
Mon_115_008_000623	S44	Email	7. We are facing a very stressful future of irrevocable change which is totally out of proportion to and insensitive to this small rural community. It amounts to onshore blight with its very substantial loss of productive farmland, its devastating visual harm, its destruction and environmental damage and its affect on the people who live here. No community benefits can ever compensate for what we are losing. The great care taken to preserve animal habitats is in stark contrast to the lack of care shown towards the people living in the same area.	The Applicant is committed to developing the Mona Offshore Wind Project in a way that is sensitive to the needs of both local communities and the environment. Impacts in both areas are being carefully assessed and appropriate mitigation for impacts identified have been included within the Environmental Statement. Information relating to the onshore EIA and approach to mitigation and measures adopted as part of the	No
				Mona Offshore Wind Project are presented in relevant topic chapters in Volume 3 of the Environmental Statement.	
Mon_116_001_180523	S47	Email	I am currently looking for a property to buy in the Abergele, North Wales area and I would be grateful if you could provide me with some information. Today I was travelling along a country lane approximately 1 mile west of Abergele hospital which is just off the A548 road. There is a property for sale along this road called Nant Ganol, Rhyd Y Foel, and I saw a printed notice near the entrance to this property and again a little further along the road at the boundary of this property next to the entrance to a public footpath. It gave some information about your	The site notices near the property are to identify the owners, occupiers and those who have an interest in the unregistered parcel of land. The project will be seeking to agree voluntary agreements with people with an interest in land within the order limits where required to deliver the project. The cables will be	No





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			offshore project and mentioned something about compulsory purchase of land. I could not find any information on your website regarding this, and so I wondered if you could answer a couple of questions for me. Since on your website there is a marked area located some way offshore, I wondered if the area near Abergele I mentioned will possibly be subjected to any compulsory land purchase, and more importantly from my perspective where this might be. Even if there are no purchases in progress at this time I would like to know where this might be and what might be considered to be built there such as any windmills and / or substations or similar infrastructure. Even if nothing is certain at this time, I would appreciate knowing what could happen at some point and where so that I can take into account all factors in the area that could affect any land, property, or views in the area.	placed underground with an above ground substation being erected in the St Asaph area, more information on the proposed location of these works can be found in the draft works plans.	
Mon_002_013_080623	S42/S44	Email	D. COMMENTS ON PEIR Given its limited resources and the volume of PEIR documents, the Council can, at this stage, only focus on issues of principle and relevant onshore elements of the scheme.	The Applicant notes your response	No
Mon_015_001_160623	S42/S44	Email	Re: Your Recent Pre-Application Consultation I refer to your pre-application consultation regarding the above matter, and would like to provide the following response on behalf of Conwy County Borough Council within the agreed extended deadline. The proposal was submitted to the Planning Committee on the 14th June 2023 following consultation with relevant Officers. The Council has no objection in principle to the development, but considers that further refinement is required of the working corridor and that further assessment is required of the effects of the proposal. In particular:	The Applicant notes your response	No
Mon_015_022_160623	S42/S44	Email	The developer is requested to give due consideration to these matters in refining the proposal and in preparing the Environmental Statement. The Council would be happy to clarify these matters on request, and asks to be updated on the timescale for submission of the application.	The Applicant notes your response	No
Mon_120_001_150623	S44	Email	The proposal is for an extremely large scale 1.5GW offshore wind farm with extensive associated onshore infrastructure. Proposals affect a large area of North Wales, in particular St Asaph/Cefn Meiriadog, with an approximate 30 acre onshore substation to be located adjacent to the city of St Asaph. There are multiple issues requiring comment by St Asaph City Council	The Applicant notes your response	No
Mon_120_009_150623	S44	Email	6. Inadequate consultation for St Asaph/Cefn Meiriadog residents. No project literature or feedback forms were deposited in St Asaph library by BP. On being asked why, BP stated that numerous attempts were made to contact the Library without success. This has resulted in residents not being able to feedback, other than online. This has been poor on BPs behalf as not everyone has online facilities or the ability to travel to the further afield libraries which did hold the paper information.	A public consultation event was held at Neuadd Owen Village Hall, Cefn Meiriadog, St Asaph LL17 0EY on Saturday 20 May from 10am to 1pm. 56 people attended this event. A full printed copy of the PEIR was available at this event, as well as a range of other reference materials such as maps and drawings. Bilingual copies of the PEIR NTS, Consultation Brochure and Feedback Forms were available to take away. USBs of the PEIR were also available to take away. Document request forms were available, for visitors to use to request further copies of project materials by post. Contact details were widely advertised and people could contact the team via	





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				email, FREEPOST or phone to request materials including hard copy of feedback forms.	
Mon_122_001_080723	S42	Email	We welcome the opportunity to comment on this significant offshore and onshore Nationally Significant Infrastructure Project (NSIP) and note that determination is being undertaken by the UK Secretary of State for the Department for Energy Security and Net Zero, though the majority of the offshore development and the entire on-shore development lies within Welsh jurisdiction.	The Applicant notes your response	No
Mon_122_002_080723	S42	Email	We recognise that development of renewable energy generation capacity is important, however this mustn't be undertaken without due regard to the need to protect and actively enhance the biodiversity of Wales and its coastal waters.	The Applicant notes your response	No
Mon_122_003_080723	S42	Email	We note that you are consulting with Natural Resources Wales (NRW), Natural England (NE) and JNCC with respect to ecological impacts on the off-shore SACs & SPAs and terrestrial SSSIs.	The Applicant notes your response	No
Mon_122_004_080723	S42	Email	Cyngor Bro Cwm Cadnant's seaward boundary is adjacent to Afon Fenai a Bae Conwy SAC/Menai Strait and Conwy Bay SAC and though this development doesn't directly impact on any land within Cwm Cadnant, it does however raise concerns of a wider nature.	The Applicant notes your response	No
Mon_125_001_200423	S47	Feedback form	I for one am extremely positive about all forms of wind energy onshore and off	The Applicant notes your response.	No
Mon_125_002_200423	S47	Feedback form	very happy to support all forms of wind generation on-shore and off	The Applicant notes your response.	No
Mon_125_003_200423	S47	Feedback form	all positive. in combination with nuclear base load this is the way forward on-shore and off.	The Applicant notes your response.	No
Mon_126_001_210423	S47	Feedback form	I'm strongly in favour of wind farms, to help deal with climate change and reduce our dependence on fossil fuels.	The Applicant notes your response.	No
Mon_126_002_210423	S47	Feedback form	Wildlife will be greatly affected if we don't deal with climate change.	The Applicant notes your response.	No
Mon_126_003_210423	S47	Feedback form	Wildlife will be greatly affected if we don't deal with climate change.	The Applicant notes your response.	No
Mon_126_004_210423	S47	Feedback form	Wildlife will be greatly affected if we don't deal with climate change.	The Applicant notes your response.	No
Mon_126_005_210423	S47	Feedback form	I don't agree with commercial fishing.	The Applicant notes your response.	No
Mon_126_007_210423	S47	Feedback form	Projects like these are essential to deal with climate change	The Applicant notes your response.	No
Mon_129_001_240623	S47	Feedback form	I just wonder why, bp could not get a British partner to do this.	Noted. Energie Baden-Wuerttemberg AG (EnBW) is one of the largest energy supply companies in Germany and supplies electricity, gas, water, and energy solutions and energy industry services to around 5.5 million customers with a workforce of more than 23,000 employees.	No





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				EnBW was among the pioneers in offshore wind power with its EnBW Baltic 1 offshore wind farm in the Baltic Sea. EnBW has been demonstrating its offshore strength in designing, constructing and operating wind farms for over one decade in the Baltic Sea and North Sea.	
Mon_129_002_240623	S47	Feedback form	Why not get a British partner instead of a German one?	Noted. Energie Baden-Wuerttemberg AG (EnBW) is one of the largest energy supply companies in Germany and supplies electricity, gas, water, and energy solutions and energy industry services to around 5.5 million customers with a workforce of more than 23,000 employees. EnBW was among the pioneers in offshore wind power with its EnBW Baltic 1 offshore wind farm in the Baltic Sea. EnBW has been demonstrating its offshore strength in designing, constructing and operating wind farms for over one decade in the Baltic Sea and North Sea.	No
Mon_130_001_260423	S47	Feedback form	You can re-imagine all you want. Climate crisis is hyped beyond belief. Net zero is a joke. Renewable energy is insufficient and ugly. Ruminants have been farting since they arrived on the planet. We the people have not been consulted about very much in decades apart from Brexit and the global controllers didn't like our response. Whatever you are doing is already a done deal. So why ask?? The gen Z's and wokeys will love it.	The Applicant notes your response.	No
Mon_130_002_260423	S47	Feedback form	no further comment	The Applicant notes your response.	No
Mon_130_003_260423	S47	Feedback form	no further no further comment.	The Applicant notes your response.	No
Mon_131_003_280423	S47	Feedback form	Your website is not user friendly.	Noted. The Applicant believes the project website has been designed in a way that promotes a digital-first consultation and that it is easily accessible to a wide range of users.	No
Mon_131_004_280423	S47	Feedback form	There has to be an effect on marine life	The assessments on marine life are presented in the following chapters: - Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement - Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement - Volume 2, Chapter 4: Marine mammals of the Environmental Statement - Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement.	No
Mon_132_001_030523	S47	Feedback form	Like most such consultations, there is little hope that the consultation is there to support a foregone conclusion - with a process heavily loaded towards it.	The Applicant notes your response.	No





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Mon_133_001_050523	S47	Feedback form	I am opposed to the building of anymore windfarms in the sea around the UK.	The Applicant notes your response.	No
Mon_133_003_050523	S47	Feedback form	They are blot on the natural world.	Response noted.	No
Mon_137_001_180523	S47	Feedback form	We are aware of the plans for Morecambe Offshore Windfarm and are generally supportive of all offshore wind in the Northwest in line with the Metro Mayor Manifesto commitment to triple offshore wind production, and make the Northwest Britain,Äôs Renewable Energy Coast.	The Applicant notes your response.	No
			We have no specific comments to offer on the Consultation.		
Mon_186_001_180523	S47	Feedback form	No comment.	The Applicant notes your response.	No
Mon_186_002_180523	S47	Feedback form	No comment.	The Applicant notes your response.	No
Mon_186_003_180523	S47	Feedback form	No comment.	The Applicant notes your response.	No
Mon_186_004_180523	S47	Feedback form	No comment.	The Applicant notes your response.	No
Mon_149_011_260523	S47	Feedback form	Resident disruption is very problematic in this area. Many residents have concerns over these projects.	The Applicant is committed to minimising disruption to local residents. A Code of Construction Practice (CoCP) will be produced and agreed with the relevant Local Authority. This will identify the likely impacts of constructions works and propose appropriate mitigation measures and set out how those measures will be communicated to local communities.	No
Mon_151_003_270523	S47	Feedback form	Generation of clean energy is good for. Climate change	The Applicant notes your response.	No
Mon_155_001_31/05/23	S47	Feedback form	The quality of information is poor - am I supposed to guess where Cefn Meriadog is?	Noted although the Applicant does not agree that the quality of information provided was poor.	No
Mon_156_002_010623	S47	Feedback form	The whole project is bad for the industries involved, the negative impact will be huge.	The Applicant believes there will be significant levels of opportunities created for businesses operating in - and supplying goods and services to - the offshore wind industry in North Wales.	No
Mon_156_004_010623	S47	Feedback form	Badly calculated project with many negative effects.	All effects have been carefully identified and measured. Where appropriate mitigation measures have been proposed in the Applicant's Environmental Statement	No
Mon_156_006_010623	S47	Feedback form	Please, consider abandoning the project as it is very damaging. See my comments above.	The Applicant notes your response.	No
Mon_156_007_010623	S47	Feedback form	It will damage the life of the above.	The Applicant notes your response.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_156_008_010623	S47	Feedback form	It will negatively affect the life of the above.	The Applicant notes your response.	No
Mon_156_009_010623	S47	Feedback form	It will affect it.	The Applicant notes your response.	No
Mon_156_010_010623	S47	Feedback form	It will be damaged.	The Applicant notes your response.	No
Mon_156_011_010623	S47	Feedback form	Their lives will be badly affected and damaged.	The Applicant notes your response.	No
Mon_156_012_010623	S47	Feedback form	It will be badly affected.	The Applicant notes your response.	No
Mon_156_013_010623	S47	Feedback form	It will be negatively affected.	The Applicant notes your response.	No
Mon_156_014_010623	S47	Feedback form	It will be affected, also the weather factor of the Irish Sea.	The Applicant notes your response.	No
Mon_156_015_010623	S47	Feedback form	It will be badly affected.	The Applicant notes your response.	No
Mon_156_016_010623	S47	Feedback form	It will be affected plus the weather factor of the Irish Sea should be taken into account.	The Applicant notes your response.	No
Mon_156_017_010623	S47	Feedback form	The whole project will be damaging for many industries.	The Applicant notes your response.	No
Mon_156_018_010623	S47	Feedback form	It will be damaging from all angles.	The Applicant notes your response.	No
Mon_156_019_010623	S47	Feedback form	It will be negatively affected.	The Applicant notes your response.	No
Mon_156_020_010623	S47	Feedback form	The lives of Manx residents and their relatives are at stake.	The Applicant notes your response.	No
Mon_156_021_010623	S47	Feedback form	Very damaging and having a huge negative impact.	The Applicant notes your response.	No
Mon_156_022_010623	S47	Feedback form	The lives of Manx residents and their UK relatives will be damaged.	The Applicant notes your response.	No
Mon_156_023_010623	S47	Feedback form	Damaged and badly affected by this project,	The Applicant notes your response.	No
Mon_156_024_010623	S47	Feedback form	The project MUST be abandoned.	The Applicant notes your response.	No
Mon_156_025_010623	S47	Feedback form	There are so many risks, that the project must be abandoned.	The Applicant notes your response.	No





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Mon_156_026_010623	S47	Feedback form	It will be destroyed.	The Applicant notes your response.	No
Mon_156_027_010623	S47	Feedback form	Spoiled and damaged by this project.	The Applicant notes your response.	No
Mon_156_028_010623	S47	Feedback form	Bad use and damaging.	The Applicant notes your response.	No
Mon_156_029_010623	S47	Feedback form	Damaging.	The Applicant notes your response.	No
Mon_156_030_010623	S47	Feedback form	Spoiled.	The Applicant notes your response.	No
Mon_156_031_010623	S47	Feedback form	Spoiled and damaged.	The Applicant notes your response.	No
Mon_156_032_010623	S47	Feedback form	The project will bring more damage.	The Applicant notes your response.	No
Mon_156_033_010623	S47	Feedback form	Spoiled and badly affected.	The Applicant notes your response.	No
Mon_157_001_010623	S42	Feedback form	Eryri National Park Response (June 2023) to the Mona Offshore Wind Project Eryri National Park welcomes the opportunity to be able to comment and respond to these documents, in relation to the Mona Offshore Wind Farm. The National Park welcomes and encourages suitable renewable energy developments in order to address the climate emergency and energy resilience, provided that the natural environment is protected and not negatively impacted.	The Applicant notes your response.	No
Mon_158_004_020623	S44	Feedback form	The projects are planned individually with no "joined-up" forward thinking, with no regard for the overall disproportionality on a small rural area. BP Code of Conduct states the importance of "Doing The Right Thing". How can this be the "right thing?" There are UK publications sharing 'evidence-based' expert opinion regarding the desperate need to change the offshore wind energy planning system before it is too late and coastal areas and rural communities are destroyed forever. It is acknowledged that people living in such communities are losing confidence in the planning system. One excellent document is "Policy Exchange": Crossed Wires- maintaining Public Support for Offshore wind farms". July 08, 2021, Ed Birkett. It recognises that no organisation is wholly responsible for planning the onshore/offshore network. There is a lack of clear strategic planning, piecemeal infrastructure. Clearly we all acknowledge that we need to have lower carbon energy production, but not at any price.	be explored. The Applicant is working within existing guidelines and legislation set by the Planning	No
Mon_158_006_020623	S44	Feedback form	The Offshore Transmission Network Review July 2020 demonstrates that we need to find solutions to reduce Social and Environmental impact of projects under development. This truly needs to start here and now in Cefn Meiriadog.	Noted. The Applicant is aware of initiatives such as the ESO Offshore Transmission Network Review and will always work alongside Government and regulators. At present a radial connection is the only deliverable option for the Mona Offshore Wind Project.	No





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Mon_158_007_020623	S44	Feedback form	2020 ESO Offshore Coordination Project - ESO analysis shows that an integrated approach will significantly reduce on/offshore infrastructure and landing points by 50% if delivered by 2025.	Noted. The Applicant is aware of initiatives such as the ESO Offshore Coordination Project and will always work alongside Government and regulators. At present a radial connection is the only deliverable option for the Mona Offshore Wind Project.	No
Mon_158_008_020623	S44	Feedback form	At the recent Mona event in Neuadd Owen, Cefn Meiriadog, I feel it would be correct to say that BP failed to give any satisfactory response as to why things are not changing for the better despite all the reports/evidence pointing to the need for a more integrated and properly planned programme of growth, whilst respecting our communities and heritage.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No
Mon_158_010_020623	S44	Feedback form	This question encompasses so much, it is something that should truly have been considered at the very beginning, not asking the public at this stage, unless you truly consider doing the "right thing" for Cefn Meiriadog and its' people? All electrical NSIP's should be working nationally, regionally and locally without question, but in a cohesive manner which is definitely not occurring currently. Perhaps BP could tell the affected residents how they REALLY will support them long term?	The Applicant is a responsible developer which is committed to operating as part of the North Wales community for many decades to come. Throughout this period we are committed to working in partnership with the local community to ensure any impacts created by the Project are identified and appropriately mitigated. The Applicant believes the generation of renewable energy brings a range of benefits to its host communities such as job creation, supply chain opportunities, skills growth and the chance to contribute to the generation of renewable energy.	No
Mon_158_011_020623	S44	Feedback form	I cannot comprehend that you actually ask this question, bearing in mind the months and years in the planning before the affected people actually learn of a project existence, the millions of £ spent on expensive consultancy reports and so on.	The Applicant is a responsible developer committed to operating as part of the North Wales community for many decades to come. Throughout this period we are committed to working in partnership with the local community to ensure any impacts created by the Project are identified and appropriately mitigated. Statutory consultation is a key part of the planning process, one which the applicant takes seriously to engage and understand community views.	No
Mon_158_012_020623	S44	Feedback form	I do have a viewpoint though- stop the Community Benefit Funds. These are merely a sweetener tempting (and designed to tempt) people who just see the short term £ signs and not the bigger picture. If the projects were truly looking to care for communities and those directly negatively affected, CBF money would not need to exist.	The Applicant notes your response.	No
Mon_158_016_020623	S44	Feedback form	Needs to not adversely affect such important industries	The Applicant believes there will be significant levels of opportunities created for businesses operating in -	No





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				and supplying goods and services to - the offshore wind industry in North Wales.	
Mon_159_001_020623	S47	Feedback form	Please see below re shipping and believe windfalls aren't efficient enough to be worthwhile.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_160_001_020623	S47	Feedback form	Impact on Ferries. All comments in this box relate to having read "Volume 2, Chapter 12: Shipping and Navigation" and are included here as you Shipping box, 1.8, just is not big enough.	The Applicant notes your response.	No
Mon_160_002_020623	S47	Feedback form	I am disappointed in the attitude displayed in this proposal by a reputable company BP and its partners.	Noted. The Applicant is committed to being open, constructive, collaborative and solutions-focused and believes it is delivering the Mona Offshore Wind Project in a way that demonstrates these behaviours.	No
Mon_160_003_020623	S47	Feedback form	It appears to be a reversion to history of a few centuries ago when one European nation would go off exploring and unilaterally takeover another - colonisation, slave trading, etc. These days we now see reparation for the Aborginis, North American Indians, Sami in Scandinavia etc.	The Applicant notes your response.	No
Mon_160_004_020623	S47	Feedback form	Yet here we see EnBW going in with it's big feet and performing a sea grab.	The Applicant is committed to being open, constructive, collaborative and solutions-focused and believes it is delivering the Mona Offshore Wind Project in a way that demonstrates these behaviours.	No
Mon_160_005_020623	S47	Feedback form	I ask how many of the staff working on this proposal have experience of sea faring, operating ships in windy weather, being dependant upon lifeline ferries?	A series of Marine Navigation Engagement Forums (MNEFs) were held throughout 2022, drawing together organisations such as Stena Line, Isle of Man Steam Packet and Seatruck. The Marine and Coastguard Agency also attended. These forums	No





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				provided an opportunity for these subject matter experts to consider and feed in to the Applicant's proposals.	
Mon_162_001_040623	S47	Feedback form	I support the principle of offshore wind in the Irish Sea	The Applicant notes your response.	No
Mon_162_003_040623	S47	Feedback form	I think this project would be good for the local economy. In particular it would be nice to see excess power used in some sort of hydro pumped scheme which already exist in N Wales	The Applicant notes your response.	No
Mon_162_005_040623	S47	Feedback form	No comment	The Applicant notes your response.	No
Mon_162_006_040623	S47	Feedback form	No comment	The Applicant notes your response.	No
Mon_162_007_040623	S47	Feedback form	No comment, except I assume that good industry practice will be followed	Noted. The Applicant confirms industry good practice will be followed in all aspects of the development of the Mona Offshore Wind Project.	No
Mon_162_008_040623	S47	Feedback form	I would expect any impact to be short term	The Applicant notes your response.	No
Mon_162_009_040623	S47	Feedback form	I would expect any impact to be short term during construction	The Applicant notes your response and will aim to minimise and mitigate any construction impacts where possible.	No
Mon_162_010_040623	S47	Feedback form	I would expect ant impact to be short term	The Applicant notes your response.	No
Mon_162_011_040623	S47	Feedback form	I would expect any impact to be short term	The Applicant notes your response.	No
Mon_162_012_040623	S47	Feedback form	No comment	The Applicant notes your response.	No
Mon_162_013_040623	S47	Feedback form	Existing arrangements for other windfarms in the Irish and North Sea would apply	The Applicant notes your response.	No
Mon_162_015_040623	S47	Feedback form	I am not sure if this is relevant to the area in question	The Applicant notes your response.	No
Mon_162_018_040623	S47	Feedback form	I don't think that this is much of a problem, could even be an attraction like those off Colwyn Bay	The Applicant notes your response.	No
Mon_162_019_040623	S47	Feedback form	No comment	The Applicant notes your response.	No
Mon_162_020_040623	S47	Feedback form	I can't see any problems.	The Applicant notes your response.	No
Mon_162_023_040623	S47	Feedback form	Disruption likely to be temporary. Improvements already in place for Wylfa B	The Applicant notes your response and will aim to minimise and mitigate any construction impacts where possible.	No





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Mon_162_024_040623	S47	Feedback form	No comment	The Applicant notes your response.	No
Mon_162_025_040623	S47	Feedback form	I can't see how this would be affected	The Applicant notes your response.	No
Mon_162_026_040623	S47	Feedback form	No comment	The Applicant notes your response.	No
Mon_162_027_040623	S47	Feedback form	No comment	The Applicant notes your response.	No
Mon_162_028_040623	S47	Feedback form	No comment	The Applicant notes your response.	No
Mon_162_029_040623	S47	Feedback form	Turbines are out at sea so difficult to see this being a problem	The Applicant notes your response.	No
Mon_162_030_040623	S47	Feedback form	I can't see any direct impact	The Applicant notes your response.	No
Mon_162_031_040623	S47	Feedback form	No comment	The Applicant notes your response.	No
Mon_162_032_040623	S47	Feedback form	No comment	The Applicant notes your response.	No
Mon_166_001_070623	S47	Feedback form	I have noted that it is a long term project in the early stages of Development. It is hoped that updates are given regularly so we on the island are kept up to date. This was explained to me very thoroughly when your team were in Ramsey	Noted. The Applicant will continue to engage communities on the Isle of Man as the project continues.	No
Mon_166_004_070623	S47	Feedback form	No	The Applicant notes your response.	No
Mon_166_005_070623	S47	Feedback form	No	The Applicant notes your response.	No
Mon_166_006_070623	S47	Feedback form	No	The Applicant notes your response.	No
Mon_171_001_200423	S47	Consult Online	Great you have more wind farms instead of nuclear power. We need more eco energy.	The Applicant notes your response.	No
Mon_173_001_220423	S47	Consult Online	I am delighted that there is to be another wind farm off our coast, the current energy crisis needs to be addressed and we should not be relying on despotic countries for our energy provision	The Applicant notes your response.	No
Mon_175_001_230423	S47	Consult Online	I support the proposals for Mona wind farm. Renewable energy is the way forward.	The Applicant notes your response.	No
Mon_179_001_270423	S47	Consult Online	I am pleased to support more offshore wind turbines in the Irish Sea / Celtic Sea for the production of green electricity. I am glad that the connecting cables are planned to go under sea to a site near Abergele rather than on Anglesey.	The Applicant notes your response.	No





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Mon_180_003_280423	S47	Consult Online	Oil and gas are plant based	The Applicant notes your response.	No
Mon_180_004_280423	S47	Consult Online	The earth is 6 bln years old and never was the same, change is part of life/evolution, warm and cold periods are part of this evolution. No scientists needed.	The Applicant notes your response. However, it believes the generation of renewable energy brings a range of benefits to its host communities such as job creation, supply chain opportunities, skills growth and the chance to contribute to the generation of renewable energy.	No
Mon_181_001_010523	S47	Consult Online	Great. More Turbines means more green energy and we're not dependant on foreign oil/gas.	The Applicant notes your response.	No
Mon_182_002_070523	S47	Consult Online	and the whole need for wind turbines is based on incorrect science - that CO2 from hydrocarbon fuel use is any sort of problem for the climate! Watch this https://www.bitchute.com/video/SSGeh7v23M7y/ Viscount Monckton demolishing the whole basis for your project. THINK AGAIN.	The Applicant notes your response. However, it believes the generation of renewable energy brings a range of benefits to its host communities such as job creation, supply chain opportunities, skills growth and the chance to contribute to the generation of renewable energy.	No
Mon_188_001_020623	S47	Consult Online	Please see attached document relating to euNetworks Rockabill cable system	The Applicant notes your response.	No
Mon_189_001_020623	S47	Consult Online	I appreciate the consultation ends on the 4th June. Due to the high demand for consultation responses on that date is it possible to have our submission accepted by close of play on the 5th June? Kind regards,	Noted. The Applicant was happy to consider feedback submitted beyond the deadline.	No
Mon_190_001_020623	S47	Email	.if the project was to be in the field directly behind the park it would be a blog on the landscape and the noise and dust etc would cause our static owners no end of distress	The Applicant notes your response. Onshore Substation Option 2 is the final onshore substation location that has been taken forward. Mitigation measures to manage construction impacts including noise and dust are included in the Outline CoCP (document reference J26) and measures to mitigate impacts to the landscape are included in the Outline Landscape and Ecological Management Plan (Document Reference J22).	No
Mon_190_002_020623	S47	Email	this is a well established site and we mainly serve the elderly on our site for a quiet and peaceful retreat, some also have illnesses and love the rural area	The Applicant notes your response.	No
Mon_190_003_020623	S47	Email	in short / long term de, value the statics and the sitethe owner wants to stress his clear objections to it been directly behind and on full view from the owners statics	Noted and received.	No
Mon_191_001_210423	S47	Email	I live in the Isle of Man and am deeply concerned and opposed to your application to develop the Mona Offshore Wind Project if the stops the IOM boats (freight, food, provisions and passengers) travelling to and from the Isle of Man. We are an Island. It is our life line. Please do not shut us off!!!!	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased	



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				the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_192_001_250423	S47	Email	We would like to state our concerns over the planned below project: MONA OFFSHORE WIND PROJECT If this site was to go ahead it could have a deep impact on the people and businesses on and off the Isle of Man. Much of the Islands trading involves travel to and from Liverpool and the Mona site would mean a change in the usual direct route. This would then mean that travel costs and travel time would also have to be raised. We are very much against the Mona site proposal. Thank you,	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_194_001_030623	S47	Email	I am setting out 7 reasons why these schemes do not work well at all. The projects are not cost affective by requiring massive infrastructure investment and with the rapid advances in technology plans can be quickly become out of date. How is it with all the wind farms we have already built 'business leaders claim UK's wind farms do not help the economy'. (please find the Youtube report by typing in the text)	The Applicant notes your response. However, it believes the generation of renewable energy brings a range of benefits to its host communities such as job creation, supply chain opportunities, skills growth and the chance to contribute to the generation of renewable energy.	No
Mon_194_002_030623	S47	Email	I will provide seven links to short and easy to follow videos which covers each of the reasons why I believe these types of developments are not required. I am referring to all three of the above development options. I object also to any proposals that blot the landscape with eye sores such as these off shore projects or otherwise.	The Applicant notes your response. To see visualisations of the array area, please see Volume 6, Annex 8.6: Seascape visualisations Environmental Statement (Document Reference F6.8.6).	No





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Mon_194_003_030623	S47	Email	Firstly, and most importantly please allow me to deal with why these developments are springing up. It is because of the fantasy land 'net zero' that will never be reached. Even if it net zero were to be attained what happens then? No one has answered that question	The Applicant notes your response.	No
Mon_194_004_030623	S47	Email	There is no evidence whatsoever of any global warming. Climate change is a natural constant that has been occurring over millions of years. We are constantly in weather cycles caused by solar activity and adjustments with the Earth's axis, and weather temperatures fluctuate naturally over time. There is evidence of the WEF and other globalist supporting elites re-writing history to suit there agenda regarding weather data.	The Applicant notes your response.	No
Mon_194_005_030623	S47	Email	It does not make any sense that in only 2000 years of existence such a short period of time in Earths history claims are being made that already the planet is heading for a disaster. It seems there is very obviously a narrative of disinformation and an agenda to make a quick buck while the climate craze is the narrative of the day.	The Applicant notes your response.	No
Mon_194_006_030623	S47	Email	I believe what is being attempted is political, it is being orchestrated by an elite few of which there are only about 2000 people usually born into their riches. They are globalists and there is a tyrannical movement to try to assert power and control over the masses. This is not a conspiracy theory when the agenda is set out by the WHO and the WEF for all to read clearly under the guise of The Great Reset.	The Applicant notes your response.	No
Mon_194_007_030623	S47	Email	It seems to me to be ludicrous to construct developments like this. The whole wind power thing sounds ideal but it isn't a good idea at all it does not work when the wind stops blowing. It is very expensive to manufacture and costly to service the infrastructure. It's greatest downfall is when the wind stops blowing as it frequently does during a high pressure weather cycles you cannot store the energy that has been created. You have to sell it to other countries usually in the EU. The leaders of those countries know there is no ability to store excess wind power and also know we have to sell it and so bang goes our bargaining capability. Then should we end up heavily dependant upon schemes like what is proposed the reverse happens. We have to buy energy back when we desperately need it and this is usually at inflated prices because once again we have no ability to negotiate a competitive price.	The Applicant notes your response. However, it believes the generation of renewable energy brings a range of benefits to its host communities such as job creation, supply chain opportunities, skills growth and the chance to contribute to the generation of renewable energy.	No
Mon_194_008_030623	S47	Email	I do not believe your industry is green at all. The turbines consist of components such as fibreglass, plastics, many other treated components which when in conditions out at sea can fail very quickly and will pollute the seas as bits flake off and fall into the water. No doubt this will be toxic for fish and birds. In my lifetime I have witnessed a transformation to the quality of water which is the Irish sea along the beach at Southport, which is where the 'bits' will end up. We have cleaned up our waters but will undo all this good planning with these types of projects. We seem to be spiralling downwards by spending on projects such as any of these three options.	The Applicant notes your response. However, it believes the generation of renewable energy brings a range of benefits to its host communities such as job creation, supply chain opportunities, skills growth and the chance to contribute to the generation of renewable energy.	No
Mon_194_010_030623	S47	Email	No amount of wind farms are going to be able to provide enough power for these British islands. Britain is only responsible for 3% of the worlds carbon emissions. Yet we shut down our power stations when we have plenty of natural resources but import wood pellets all the way from Brazil for use at one remaining power station Drax, We send our waste sometimes half way around the globe to be recycled. We are shooting ourselves in the foot repeatedly and impoverish ourselves at the same time striving for fantasy land net zero. While Germany continue to use thermal powered power stations and have over 100 and China are on a trajectory of over 200 coal powered stations. This makes no sense	The Applicant notes your response.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_194_011_030623	S47	Email	The Dinorwig power station, also known as Electric Mountain, is the biggest hydroelectric facility and the fastest power-generating asset in the UK, capable of delivering up to 1,728MW of electricity in just 16 seconds. Operating since 1984, it is a pumped-storage hydropower facility built in caverns inside the Elidir Fawr mountain in Dinorwig, Llanberis, in north Wales. It comprises six pump-turbine units housed in the main cavern, which is considered to be the biggest man-made cavern in Europe	The Applicant notes your response.	No
Mon_194_012_030623	S47	Email	The Climate Realism Series 1 - 7 PART 1 https://rumble.com/v1smwdy-climate-realism-series-when-the-wind-stops-pt1-not-economical-to-store-surp.html PART 2 https://rumble.com/v1smxgk-climate-realism-series-when-the-wind-stops-pt2-not-economical-to-store-surp.html PART 3 https://rumble.com/v1smydw-climate-realism-series-when-the-wind-stops-pt3-not-economical-to-store-surp.html PART 4 https://rumble.com/v1smz2w-climate-realism-series-paul-burgess-when-the-wind-stops-pt4-we-have-to-payhtml PART 5 https://rumble.com/v1sn2em-climate-realism-series-paul-burgess-when-the-wind-stops-pt5-dinorwig-powerhtml PART 6 https://rumble.com/v1qsspm-when-the-wind-stops-part-6-useless-wind-farm-energy-production-explained-de.html PART 7 https://rumble.com/v1rp9lc-when-the-wind-stops-pt7-is-anybody-doing-the-maths.html These are important videos because it totally exposes the absurdity of storing wind energy to even out it's supply. The producer Paul Burgess found at the original youtube source url below says like always, he will answer any questions on the subjects raised within the videos. Mr Burgess has great experience of managing the Dinorwig Power Station just down the coast and so is also familiar with this coast line, why has nobody bothered to contact him? The Dinorwig power station, also known as Electric Mountain, is the biggest hydroelectric facility and the fastest power-generating asset in the UK, capable of delivering up to 1,728MW of electricity in just 16 seconds. Operating since 1984, it is a pumped-storage hydropower facility built in caverns inside the Elidir Fawr mountain in Dinorwig, Llanberis, in north Wales. It comprises six pump-turbine units housed in the main cavern, which is considered to be the biggest man-made cavern in Europe.	Noted and received.	No
Mon_195_001_060523	S47	FREEPOST	I fully support the Mona Offshore Windfarm Generation. Anything has to be better than nuclear.	The Applicant notes your response.	No
Mon_197_001_190623	S44	FREEPOST	Did You Know, received march/April 2023, advising of 3 No presentation displays, in St Asaph, Bodelwyddan and Cefn, 5th May, 19th May 20th May 2023 respectively - the information at the above was in relation to Mona and Morecambe - I attended 2 No of these, St Asaph and Bodelwyddan Off note at the events there were no signing in sheets for interested parties to confirm interest and for providing individual details for future detailed correspondence - Received Mona Offshore Wind Project Proforma, for completing Statutory consultation feedback from 19th April to 4th June 2013	The Applicant notes your response to receiving the consultation information and thanks the consultee for attending the events. The consultation events were open to anyone who wished to attend to find out more about the proposals and printed feedback forms were available at each event in Welsh and English and included, at the start of the form, a 'Personal Information' section where visitors could fill in their name, address and email	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			Letter received 23rd May 2023, no reference or date of issue, but advises dates of 23rd May and 20th June 2023	address, and tick a box if they would like to opt in to receive project updates. The forms could be left at branded 'Feedback' postboxes at the event, given to a team member, or posted back free of charge to FREEPOST MONA.	,
Mon_197_005_190623	S44	FREEPOST	At the presentations to which I attended 2 No as confirmed above, the room displays were 50/50 Mona and Morecambe, not sure why, we will have difficulty seeing the Mona Wind Farm as it is north of the current wind farms, those of North Hoyle, 2 No Gwynt A Mor, Rhyl Flats and Awel Y Mor, the Morecambe development appeared to be a 'red herring', just to confuse and complicate things, and to mask the scale and location of the on land infa structure and Mona substation	The Applicants approach for statutory consultation was to carry out combined events for both Mona and Morecambe projects, combining materials where appropriate and thus aiming to minimise consultation fatigue. Attendees could also find out information on both projects during a single visit. Each project published its own consultation brochure, feedback forms and exhibition displays.	No
Mon_197_006_190623	S44	FREEPOST	The information provided at the presentations was very generic, not providing specific detail affecting residents in the St Asaph area, there was so much generic documentation on display, no copies were available and visitors to the presentations were advised to go on line, days of viewing to get the specifics, which there were no clear specifics, please see later.	At the consultation events there were large scale maps with further details on the locations for attendees to view and discuss. A full copy of the PEIR was available for reference. Team members were at hand to discuss specific topics or locations, if requested, and could refer visitors to the appropriate chapters of the PEIR to be studied in more detail online if desired. USB sticks containing the PEIR, and printed copies of the PEIR NTS and the Consultation Brochure were available to take away.	No
Mon_197_014_190623	S44	FREEPOST	All information from the handed out literature (very little available at the presentations) has been on A4 large map areas, which makes specific details impossible to define.	At the consultation events there were large scale maps for attendees to view and discuss. A full copy of the PEIR was available for reference. Team members were at hand to discuss specific topics or locations, if requested, and could refer visitors to the appropriate chapters of the PEIR to be studied in more detail at the event, or online at a later date if desired. USB sticks were available to take away containing the PEIR, including large scale maps. Detailed maps were also available on the project's website, within the Consultation Hub.	No
Mon_204_002_020623	S42	Email	Please can all responses to this representation be sent to REDACTED via the email address REDACTED.	Noted. Response received.	Yes
Mon_208_011_040623	S44	Email	Consultation and Engagement The Owners do not consider sufficient engagement has been undertaken with landowners to fully inform the project design or to incorporate relevant mitigation. Further detailed engagement should continue with all affected parties to ensure feedback and mitigation is fully considered ahead of any submission of the DCO and we welcome meaningful engagement with the Project Team going forward.	Noted, Dalcour Maclaren will continue to engage with landowners to discuss the project and the potential impact on land.	No
Mon_209_008_040623	S44	Email	Consultation and Engagement Further detailed engagement should continue with all affected parties to ensure feedback and mitigation is fully considered ahead of any submission of the DCO and we welcome meaningful engagement with the Project Team going forward.	Noted.	No



D.25.2 Introduction and glossary table of responses



Table D.25. 2: Introduction and glossary table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_043_003_290523	S42	Email	SPEN have requested the following: - ensure that where there are impacts these can be managed in an appropriate way through agreed protective provisions	It has been identified that SP Energy Networks assets are located within the order limits of the Mona Offshore Wind Project. The Applicant has included protective provisions for the protection of SP Energy Networks in the draft DCO and the Applicant remains in ongoing dialogue with SP Energy Networks to ensure its assets are correctly identified and, where necessary, appropriate mitigation is put in place.	Yes
Mon_043_004_290523	S42	Email	SPEN have requested the following: - ensure the agreed measures are made clear to contractors working on site through required method statements	It has been identified that SP Energy Networks assets are located within the order limits of the Mona Offshore Wind Project. The Applicant has included protective provisions for the protection of SP Energy Networks in the draft DCO and the Applicant remains in ongoing dialogue with SP Energy Networks to ensure its assets are correctly identified and, where necessary, appropriate mitigation is put in place.	Yes
Mon_043_005_290523	S42/S44	Email	SPEN have requested the following: - ensure that where existing land rights are interfered with then these are replaced with new rights which retain SPEN's existing rights or new rights	It has been identified that SP Energy Networks assets are located within the order limits of the Mona Offshore Wind Project. The Applicant has included protective provisions for the protection of SP Energy Networks in the draft DCO and the Applicant remains in ongoing dialogue with SP Energy Networks to ensure its assets are correctly identified and, where necessary, appropriate mitigation is put in place.	Yes
Mon_043_006_290523	S42/S44	Email	SP Energy Networks will require all SPM land rights affected by the scheme that need to be amended to be agreed in full agreement with SPM. Reference is made to the Book of Reference where SP Manweb interests are included. Reviewing the BoR and confirming existing and proposed rights is likely to be an expansive task and the applicant is asked to engage with SPM regarding a timetable and cost undertakings to support working with SP Energy Networks in this regard.	order limits of the Mona Offshore Wind Project. The Applicant has included protective provisions for the protection of SP Energy Networks in the draft	Yes
Mon_051_004_310523	S42	Email	The Mona OWF Project is a proposed offshore wind farm located in the east Irish Sea, being developed by Mona Offshore Wind Ltd, a joint venture of bp Alternative Energy Investments Limited and Energie Baden-Württemberg AG (EnBW).	The Applicant notes your response.	No
Mon_053_001_010623	S47	Email	Response to Wind Farm Consultations Positives: - The offshore wind sector is a key part of our energy infrastructure and, in many instances, has created jobs for coastal communities across the UK. Whether this will lead to increased employment in the Isle of Man remains to be seen; The fuel is free as the turbines run on the power of the wind generated. This reduces the overall cost in comparison to other forms of renewable energy, which may require some energy investment; Offshore wind speeds tend to be faster than on land and more reliable, so more energy can be generated; Offshore, rather than onshore, means less visible detriment (unless of course you can see them from shore); Clarity required if there will be a reduction in electricity costs which would be beneficial to the Council, and to many of our suppliers thereby reducing their need for price increases; Once the pipeline is connected to the grid the interconnector will supply green energy and improve the carbon footprint		No
Mon_066_032_020623	S42	Email	Thank you for your consultation dated 19 April 2023 requesting our advice on the Preliminary Environmental Information Report (PEIR) submitted in support of the Mona Offshore Wind Farm Project. Natural England are content to provide high level comments on the PEIR, however we note that the majority of the Mona Offshore Wind Farm Project is based within Welsh waters. Therefore we	The Applicant notes your response.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			largely defer to Natural Resources Wales (NRW) as the primary and lead statutory consultee for the Mona Offshore Wind Farm Project.		
Mon_069_005_010623	S42	Email	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 law¹ 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 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.	Potential impacts upon environmental receptors within the Isle of Man are fully considered in the Environmental Statement (see Volume 2, Chapters 1 to 10; Volume 3, Chapters 1 to 10; and Volume 4, Chapters 1 to 4 of the Environmental Statement).	No
Mon_069_006_010623	S42	Email	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.	The Isle of Man is a Crown Dependency of the UK and not an European Economic Area (EEA) State. Therefore, Regulation 32 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 does not apply to the Isle of Man. For this reason, it is not considered to be a transboundary consultee for the Mona Offshore Wind Project. As such, potential impacts upon environmental receptors within the Isle of Man are not considered to be transboundary. Nonetheless, potential impacts upon environmental receptors within the Isle of Man are fully considered in the Environmental Statement (see Volume 2, Chapters 1 to 10; Volume 3, Chapters 1 to 10; and Volume 4, Chapters 1 to 4 of the Environmental Statement). See Volume 5, Annex 5.2: Transboundary impacts screening of the Environmental Statement.	No
Mon_088_005_040623	S42	Email	WTW position on OWF developments We act to empower both our members and the wider community to engage impactfully with the development of marine energy solutions to ensure they are not only sustainable but deliver biodiversity net gain by incorporating mitigation measures which go further than the precautionary principle requires and take a strategic approach to compensation.	The Applicant notes your response.	No
Mon_088_006_040623	S42	Email	Uncertainty surrounding potential OWF impacts means that even robust baseline environment information cannot comprehensively address all preconstruction, operation and decommissioning phase knowledge gaps. WTW endorse an entire life cycle Adaptive Management approach to OWF projects which, despite uncertainty, prevents unacceptable harm to the marine environment. This approach ensures that interactions with other users of the marine space are identified and managed for use-use conflicts and synergisms, ensuring the cumulative impact does not introduce a harm not scoped in when a use is viewed in isolation, and highlights opportunities for enhancement. WTW supports the development of offshore wind and other marine renewable energy projects which will play a part in delivering a resilient and decarbonised energy supply to limit climate change, but, this industrialisation of the seascape will have environmental impact and this must be strategically prevented, mitigated, and as a last resort, compensated for in order to ensure the recovery of this already degraded environment.	The Applicant notes your response.	No
Mon_088_007_040623	S42	Email	The British Energy Security Strategy (BESS) lays out a step change in the delivery of offshore wind through speeding up of consenting to the potentially weakening of the HRA process. Positives include establishing Environmental Standards for offshore wind, a marine recovery fund and commitments to an Offshore Wind Environment Improvement Package (OWEIP).	The Applicant notes your response.	No
Mon_088_009_040623	S42	Email	The WTW supports the rapid increase in MRE production to meet net zero, it presents a multiplier solution to address climate challenges, foster socio-	Noted The Applicant notes your response.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			economic growth and enhances energy security, but this cannot be at the expense of the marine environment; the consequences of exceeding tipping points in the marine system not yet understood. The evolving nature of the OWF industry should be driven by the pursuit of improvement in technology and construction methodologies to deliver sustainable development not a constant focus on cost reduction. To realise the potential contribution of OWF's to decarbonising the energy sector and helping to mitigate the worst impacts of climate change on society and nature, the OWF industry must also act to protect and support nature's recovery on land and at sea.		
Mon_120_002_150623	S44	Email	1. The huge size of the onshore substation (30 acres, with a work area approximately double this; and 20 metres in height) is completely incompatible with the rural landscapes around the small city of St Asaph. The impacts will be huge (loss of agricultural land, loss of farming in the area, visual impacts). Many St Asaph residents value the amenity of Cefn Meiriadog, which will be irreversibly changed.	The Mona Onshore Development Area has been refined following the Preliminary Environmental Information Report (as documented in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement). The onshore substation site and temporary working area have been reduced in size and the maximum height of the substation has been reduced to 15m. The impact of changes in land use, including the loss of agricultural land and impacts on access to amenity space are assessed in Volume 3, Chapter 7 Land use and recreation of the Environmental Statement. Impacts on landscape and visual amenity are assessed in Chapter 3, Volume 6 Landscape and visual resources of the Environmental Statement.	
Mon_162_033_040623	S47	Feedback form	There are already significant industrial sites in this area.	Cumulative effects are considered throughout the Environmental Statement that has been prepared as part of the application for development consent that has been submitted by the Applicant. These assessments consider cumulative effects of impacts arising from both existing and proposed infrastructure / development.	

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D.25.3 Policy and legislation table of responses



Table D.25. 3: Policy and Legislation table of responses

Unique Reference Identifier	S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_054_023_010623	S42/S44	Email	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 cross-border and cumulative/ in-combination 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 be advised that, in addition to the Development Consent Order, it is the responsibility of the applicant to ensure that you secure all other permits/consents relevant to the development. Please do not hesitate to contact us if you require any further information or clarification on the above.	Response noted. The application for consent is accompanied by the Other consents or licence required (document reference: J1) which sets out the consents or licences required for the Mona Offshore Wind Project that are not contained within the Development Consent Order (DCO).	No
Mon_054_535_010623	S42/S44	Email	NRW Marine Licensing Team: Regulatory Comments The Planning Act 2008 provides the ability to include or 'deem' a Marine Licence within the Development Consent Order (DCO) granted by the Secretary of State for licensable activities that are wholly within Welsh Offshore waters (beyond 12nm from the coast). NRW agrees with the principle that a deemed Marine Licence can be included in the DCO for the licensable activities that are wholly within Welsh Offshore Waters.	NRW's comment is noted, and the Applicant welcomes this confirmation.	No
Mon_054_536_010623	S42/S44	Email	As presented within the Environment Statement (ES) NRW Marine Licensing Team (NRW MLT) note that a separate Marine Licence application will be submitted for works that sit outside the deemed Marine Licence. In relation to the non-deemed Marine Licence, as detailed in the letter dated 13 July 2022, NRW MLT intends to defer to the Environmental Impact Assessment (EIA) consent decision of the Secretary of State for the purpose of Regulation 10 of the Marine Works (EIA) Regulations.	The Applicant notes your response.	No
Mon_054_537_010623	S42/S44	Email	Volume 1, Chapter 2 Policy and Legislation, Section 2.3.3.2 of the PEIR details that a separate licence will be required for marine licensable activities within 12nm of the Welsh coast; however, the 'Indicative Extent of Marine Licences Map'denotes the area of the non-deemed marine licence in both the onshore and offshore area. Clarification is therefore required specifically to confirm what activities are being proposed within the non-deemed marine licence and whether it will extend into the Welsh Offshore region. If the boundary of works under the non-deemed marine licence and deemed marine licence overlap, an explanation of the need for this overlap should be provided. NRW MLT would also require that the 12nm boundary is denoted on the map.	An explanation of the overlap in the deemed and non-deemed marine licences is provided in Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement. The figure provided within this chapter has been updated and now denotes the 12 nm boundary. Additional representation of the extent of the marine licences accompanies the application for consent in the Indicative extent of marine licences plan. The Marine Licence Principle document also sets out how the deemed Marine Licence and the standalone NRW Marine Licence will work together.	No
Mon_054_538_010623	S42/S44	Email	NRW exercise the role of the Licensing Authority under the Marine and Coastal Access Act (2009) on behalf of Welsh Government. However the enforcement provisions have not been delegated to NRW and remains with Welsh Government. Chapter 2 Policy and Legislation Section 2.3.3.2of the PEIR incorrectly refers to NRW as the Enforcement body for Marine Licences in Wales. Similarly, Welsh Government should be referred to as the Enforcement Authority within the draft deemed Marine Licence.	Noted and this has been updated in Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement. The Welsh Government has been referred to as the enforcing authority within the dML and reference to marine enforcement officers included as appropriate.	No
Mon_054_539_010623	S42/S44	Email	NRW MLT note the applicant intends to apply for 3 Marine Licences; one deemed Marine Licence in respect of activities wholly in Welsh Offshore Waters (Schedule 14 of the draft DCO), one in relation to activities in English Waters (Schedule 15 of the draft DCO) and, as detailed above, a separate marine licence application will be submitted to NRW MLT in relation to activities in inshore Welsh waters (within 12nm). NRW MLT note that the parameters provided within both deemed Marine Licences cover the project as a whole (for example Schedule 14 section 3 and 11), rather than detailing specific parameters for each separate Licence. No description of parameters for the licensable activities that will fall in the non-deemed marine licence has been provided. NRW MLT would request that specific parameters are	The Applicant has included a deemed marine licence in its draft DCO with regards to construction of the generation assets, inter-array cables, interconnector cables and offshore substation platforms and intends to apply for a standalone marine licence with regards to the export cables, interconnector cables and offshore substation platforms, please see Marine Licence Principles Document (Document Reference J9) for more information. Parameters for the whole off the offshore works are included in Schedule 2, Table 3. Parameters for the elements of the offshore works which are to be included within the deemed marine licence are included in Schedule 14, Part 2, Table 5.	





Unique Reference Identifier	S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			provided for each proposed licence. Where this cannot be achieved at this stage, justification should be provided (for example, currently 107 turbines and 4 offshore substation platforms are included in both deemed Marine Licences, in English Waters and Welsh Waters).		
Mon_054_540_010623	S42/S44	Email	Each chapter of the PEIR has identified mitigation and monitoring that the applicant considered necessary for the project. NRW MLT would advise that a document is presented that compiles all the mitigation and monitoring proposed within the ES, and identifies where it is proposed these mitigation and monitoring actions are secured, identifying the relevant condition(s) of all the deemed Marine Licences where relevant. This document should also identify which monitoring and mitigation the applicant considers will be relevant to the separate non-deemed Marine Licence	Please see the Mitigation and Monitoring Schedule (Document Reference J10).	No
Mon_054_541_010623	S42/S44	Email	NRW MLT note that no co-ordinates have been provided within the schedules or the DCO in relation to the area of works. NRW MLT recognise that reference has been given in Schedule 14 section (5) to work plans, however NRW MLT consider that the co-ordinates bounding the areas of works covered by each marine licence is required.	Coordinates for the whole of the offshore works are included in Schedule 1, Part 1, Table 1 of the draft DCO. Coordinates for the elements of the offshore works which are to be included within the deemed marine licence are included in Schedule 14, Part 2, Table 3 of the draft DCO.	No
Mon_054_542_010623	S42/S44	Email	NRW MLT note that no expiry date has been given to the licence and that there is no requirement that the decommissioning takes place prior to a specific date. NRW MLT note that within Chapter 1 Introduction, Section 1.4.1.2, reference is made to the 60 years lease from the Crown Estate in connection with the project and also a 35-year design life of the project. Clarification is required regarding the proposed duration of the project, and whether the assessment has been carried out in light of that period. Additionally, clarification is required whether the deemed Marine Licence includes activities associated with decommissioning, as construction operation and maintenance of the project are detailed within the deemed licence however decommissioning is not referred to.	As is standard for DCOs there is no end date specified in the draft Order. As a result, the dML will remain in force until the authorised scheme has been decommissioned in accordance with a programme approved by the Secretary of State under section 106 (approval of decommissioning programmes) of the 2004 Act. The Applicant does not intend for the deemed Marine Licence to cover decommissioning activities.	No
Mon_054_544_010623	S42/S44	Email	Please find below further detailed comments on the draft DCO and deemed Marine Licence. These are not intended to be comprehensive, rather to assist in the development of the deemed Marine Licence. Accordingly, NRW MLT may wish to make further comment at a future stage, and in response to any further information that may be submitted. Part 6 (43) Service of notices Part 6 (45) Requirements, appeals, etc Part 6 (46) Arbitration Schedule 13 Arbitration rules Clarification is required to the applicability of these provisions to the deemed Marine licence.	Service of notices: Schedule 14, Part 1, paragraph 1(5) of the draft DCO details the notice provisions for the dML. Requirements, appeals, etc: Article 45 only relates to matters under the TCPA 1990 and therefore it does not apply to NRW. Arbitration: article 46(2) has been updated to include NRW such that the arbitration provisions are specifically excluded where there is a dispute between the Applicant and NRW as to any provisions in the Order. Schedule 13 is consequently also excluded.	
Mon_054_545_010623	S42/S44	Email	Part 2 Section 7(3), and Section 7(10) Schedule 14 – Section 8 - Clarification is required why the DCO is seeking that the ability to transfer the deemed Marine Licence is passed to the Secretary of State (SoS) rather than remaining with NRW as the Licensing Authority. Has this been requested by the SoS?	This is standard drafting for a dML to ensure that the DCO and dML can be transferred together. The SoS is required to consult with NRW before giving consent to any transfer, see Article 7, paragraph (3) of the draft DCO.	No
Mon_054_546_010623	S42/S44	Email	Schedule 14 -Interpretation - Reference is made within the Interpretation, and for the purpose of submission of notification to the Marine Case Management System (MCMS). The MCMS is a case management system used by the MMO and is not used by NRW MLT, reference to this system within the licence should be removed. As referred to above, Welsh Government remain the relevant Enforcement Authority for the purpose of the Marine Licence. This should be made clear within the interpretation, and relevant contact details included. Welsh Government Marine Enforcement contact details are: REDACTED Addresses listed include CEFAS and Cadw, however there is no reference within the licence of any requirements to contact either of these parties, we would therefore advise these are removed.	Reference to MCMS has been removed from Schedule 14 of the draft DCO. Cefas and Cadw have been removed from Schedule 14, Part 1, paragraph 1(5) and Welsh Government Marine Enforcement Officers have been added.	No





Unique Reference Identifier	S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_054_547_010623	S42/S44	Email	Section 3 –"In connection with the licensed activities in Work Area 1 and to the extent that they do not otherwise form part of any such work, further associated development comprising such other works as may be necessary or expedient for the purposes of or in connection with the relevant part of the authorised project and which fall within the scope of the work assessed by the environmental statement, including" - NRW MLT consider that this sentence is unclear please clarify its purpose.	This is standard DCO drafting to ensure that the full scope of works assessed as part of the project within the Environmental Statement can be constructed without having to list out every element of those works	No
Mon_054_548_010623	S42/S44	Email	Section 2 (f) - Within existing Marine licences in Wales the disposal site would be designated and the disposal code and boundary of the disposal site included within the Marine Licence itself. NRW MLTseek further discussion surrounding this point as it appears that the proposal is to designate the disposal site post consent.	It is the Applicants understanding that the disposal site would be designated and the disposal code and boundary of the disposal site included within the Marine Licence. The applicant is engaged in further discussion on the with NRW-MLT	No
Mon_054_549_010623	S42/S44	Email	Section 2 and 3 - No reference is made to decommissioning activity. Please clarify whether the applicant intends that decommissioning is covered by the Marine Licence.	As is standard for DCOs there is no end date specified in the draft Order. As a result, the dML will remain in force until the authorised scheme has been decommissioned in accordance with a programme approved by the Secretary of State under section 106 (approval of decommissioning programmes) of the 2004 Act. The Applicant does not intend for the deemed Marine Licence to cover decommissioning activities.	No
Mon_054_550_010623	S42/S44	Email	Section 5-Co-ordinates in latitude and longitude decimal degrees should be provided for the licensable area covered by this licence within which the works consented by this licence will be bounded.	Coordinates for the elements of the offshore works which are to be included within the deemed marine licence are included in Schedule 14, Part 2, Table 3 of the draft DCO.	No
Mon_054_551_010623	S42/S44	Email	Section 7 - See Paragraph 484 above in relation to the duration of the licence.	The Applicant notes your response.	No
Mon_054_552_010623	S42/S44	Email	Section 10 - NRW MLT are unclear what this section is seeking to achieve, please provide further clarification surrounding the intention/purpose of the condition.	The deemed marine licence will be in force for the period of time in which the DCO is in force.	No
Mon_054_553_010623	S42/S44	Email	Section 11 - See Paragraph 481above, NRW MLT consider the parameters should be bespoke to each licence to identify what will take place under each specific licence.	This paragraph deals with potential amendments and variations to the approved details, plans and schemes, which can only be agreed with NRW where it is demonstrated that such amendment or variation is unlikely to give rise to any materially new or materially different environmental effects from those assessed in the Environmental Statement. This approach is entirely in accordance with general planning and Environmental Impact Assessment (EIA) principles and the process routinely undertaken to apply for amendments and variations of any consent in an EIA context.	
Mon_054_554_010623	S42/S44	Email	Section 11- Table 3 NRW MLT cannot find reference to the following parameters within the PEIR Chapter 3 –Offshore project description:•Maximum total rotor swept area (m2)•Maximum total length of cables (inter-array and interconnector) (km)•Maximum number of cable crossings (inter-array and interconnector) (km)Please clarify where these parameters are detailed within the ES.	Rotor diameter, cable length and number of cable crossings are provided in Volume 1, Chapter 3: Project description of the Environmental Statement (see Tables 3.1, 3.6, 3.20 and 3.26). Maximum total rotor swept area (m2) is not a controlling parameter for the purposes of the Application and is therefore not included as a parameter in the draft DCO. Maximum total length of cables (interarray and interconnector) (km) this parameter is included in Schedule 14, Part 2, Table 3 of the draft DCO. Maximum number of cable crossings (inter-array and interconnector) (km) this parameter is included in Schedule 14, Part 2, Table 3 of the draft DCO.	No
Mon_054_555_010623	S42/S44	Email	Section 12(1) -The undertaker may at any time maintain the authorised project, except to the extent that this licence or an agreement made under this licence provides otherwise. NRW MLT consider that this sentence is unclear please clarify its purpose.	This is standard DCO drafting to confirm that the dML includes allow for the general ability to maintain the authorised scheme unless stated or modified elsewhere.	No
Mon_054_556_010623	S42/S44	Email	Section 12(3) "substantially" can be removed	This has been removed.	No
Mon_054_557_010623	S42/S44	Email	Section 13 Please identify any time frames that appear to set a deadline for NRW MLT as Licensing Authority and why. The Licence sets out obligation for the	This is standard DCO dML drafting to ensure that the discharge of the dML conditions are achieved within a reasonable timeframe and to avoid delays to the project.	No





Unique Reference Identifier	S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			undertaken, we do not consider it appropriate that the licence should set deadlines for the Licensing Authority.		
Mon_054_558_010623	S42/S44	Email	Section 14 Notifications should be sent to both NRW MLT and the Welsh Government Marine Enforcement Officers (MEO), and likewise provision for inspections should reference both NRW and the MEO.	Condition 13 of the dML has been updated to reflect this comment.	No
Mon_054_559_010623	S42/S44	Email	Section 14(6 and 7) NRW MLT would expect to be informed at least 10 days prior to commencement of the licenced activities.	Condition 13 of the dML has been updated to reflect this comment.	No
Mon_054_560_010623	S42/S44	Email	Section 16(4) NRW MLT would expect disposal returns to be submitted by the 31 January detailing quantities disposed of in July to December, and by the 31 July detailing quantities disposed of between January –June. This is in line with OSPAR reporting requirements on all other disposal licences in Wales.	Condition 16 of the dML has been updated to reflect this comment.	No
Mon_054_561_010623	S42/S44	Email	Section 16(7) This should reference MEO as well as NRW MLT	Noted. This wording has been added to the application DCO and dML	No
Mon_054_562_010623	S42/S44	Email	Section 16(10) NRW MLT do not have a dropped object procedure form, however, NRW MLT would expect notification to be provided.	Approval of a dropped objects plan prior to commencement has been added to condition 18 and reference to notifications being given to NRW of dropped objects in accordance with this plan has been included in condition 16(10).	No
Mon_054_563_010623	S42/S44	Email	Section 17 Any loss should also be notified to MEO, Trinity House (TH) and Maritime and Coastguard Agency (MCA). In relation to Force Majeure NRW licences usually also include the condition below: Should it be necessary for the Licence Holder to recover or remove from the Licensed Area any equipment, plant or machinery accidentally dropped when undertaking the Licensed Activities, the Licence Holder is permitted to do so provided that the methodology for such recovery or removal has been approved by the Licensing Authority.	Reference to the MEO has been included in condition 17.	No
Mon_054_564_010623	S42/S44	Email	Section 16(10) and Section 17NRW licences usually contain the following standard condition: The Licence Holder must remove any deposited material within one month of notice being given by Licensing Authority or Marine Enforcement Officers if they consider this necessary or advisable for the safety of navigation, and shall not replace such material until the Licensing Authority or Marine Enforcement Officers have given their written approval.	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_054_565_010623	S42/S44	Email	Section 16NRW licences usually contain the following standard condition: The Licence Holder must ensure that plant, vehicles and machinery are not refuelled on the foreshore or in the sea.	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_054_566_010623	S42/S44	Email	Section 18 (2) Is there a reason why the plan showing the area of works and the programme of works are excluded here? If they are excluded what is the proposed timeframe for their submission?	These details will form part of the documents submitted prior to commencement and details in condition 18 of the draft DCO.	No
Mon_054_567_010623	S42/S44	Email	Section 18(4) Is this something that has been requested and agreed with the relevant Statutory Nature Conservation Body (SNCB)?	This is a standard requirement where UXO clearance is licenced, requiring the Applicant to provide a close out report detailing information on the clearance activities. The Applicant has discussed the clearance of UXOs through relevant Expert Working Groups and other technical engagement groups.	No
Mon_054_568_010623	S42/S44	Email	Section 18In relation to activities including Unexploded Ordnance (UXO) clearance and Impact Piling it is expected that information is inputted into the Joint Nature Conservation Committee (JNCC) noise registry.UK Marine Noise Registry)The Licence Holder must complete an entry into the UK Marine Noise Registry detailing the proposed dates and locations and nature of the [insert activities] at least 10 days prior to its commencement. b) The Licence Holder must amend the marine noise registry proposed activity form should the timing of the [insert activities] alter or no longer remain part of the project. c)The Licence Holder must complete an entry into the Marine Noise Registry detailing the actual dates, location(s) and nature of the [insert activities] every 6monthsfollowing the commencement of [insert	A new marine noise registry condition has been added to the dML (condition 29).	No





Unique Reference Identifier	S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			activities] until the completion of [insert activities] with the final entry to be completed within 8 weeks of completion of the noisy activity.		
Mon_054_569_010623	S42/S44	Email		This wording is included to make it clear that the undertaker may submit and have discharged a plan that covers the relevant stage or part of the licenced activities rather than the whole of those activities. The plan submitted to NRW would be clear as to the extent of the licenced activities any plan is intended to cover.	No
Mon_054_570_010623	S42/S44	Email	Section 19(1) Reference is made to Plans to be agreed with TH, MCA and UK Hydrographic Office (UKHO). A number of the plans detailed relate to matters outside their remit e.g. archaeology, marine mammals. NRW MLT would advise if reference is made to these organisations, the specific relevant plans should be referred to.	Condition 18(1) states that these bodies will be consulted "as appropriate" so will not need to be consulted on matters outside of their remit.	No
Mon_054_571_010623	S42/S44	Email	Section 19(1)(c) This section sits within Pre-construction plans and documents, however, sets out timeframes for submission of operation monitoring which is proposed to be agreed during the construction phase.	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_054_572_010623	S42/S44	Email	Section 20 NRW MLT are unclear what this section is seeking to achieve, please provide further clarification surrounding the intention/purpose of the condition.	This is a standard ML condition required by MCA.	No
Mon_054_573_010623	S42/S44	Email	Section 21 Notification should also be provided to the MEO.	Noted, this has been added to the application DCO and dML	No
Mon_054_574_010623	S42/S44	Email	Section 22 NRW MLT would suggest the relevant timing for submission referred to in 19(1)(c) is replicated here. This condition refers to the statutory nature conservation body. Clarification is required whether this pre-construction monitoring condition also seeks to ensure adequate navigation, or archaeological surveys and monitoring is agreed or if these are to be achieved under separate conditions.	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_054_575_010623	S42/S44	Email	Section 23(1) NRW MLT would suggest the relevant timing for submission referred to in 19(1)(c) is replicated here. This should specify that works cannot commence until the construction monitoring has been agreed.	Condition 25 follows the timings in condition 18(1)(c) and condition 18(1) includes the prohibition on commencement until construction monitoring has been agreed.	No
Mon_054_576_010623	S42/S44	Email	Section 23(2) Clarification whether monitoring of 4 piles has been requested by the SNCB.	This is a standard condition for offshore wind projects.	No
Mon_054_577_010623	S42/S44	Email	Section 23(7) Suggest reordering so that this comes before Section 23(6) which relates to navigation monitoring.	Condition 25 of the dML has been updated to reflect this comment.	No
Mon_054_578_010623	S42/S44	Email	Section 24(1) NRW MLT would suggest the relevant timing for submission referred to in 19(1)(c) is replicated here. This should specify that operations cannot commence until the post construction monitoring has been agreed by NRW MLT as the Licensing Authority.	Condition 26 follows the timings in condition 18(1)(c) and condition 18(1) includes the prohibition on commencement until post-construction monitoring has been agreed.	No
Mon_054_579_010623	S42/S44	Email		The Applicant assumes the comment refers to 24(3)(a)-(c) of the dML consulted on at PEIR (as 23 does not include (3)(a)-(c) clauses). Post construction monitoring has been a subject of discussion at relevant Expert Working Groups, or other technical engagement groups. An Offshore inprinciple monitoring plan (Document reference J15) has been submitted as part of the DCO application.	
Mon_054_580_010623	S42/S44	Email	Section 22, 23 and 24All those conditions referring to agreement of monitoring should also specify that environmental monitoring reports must be submitted to NRW MLT for approval of the Licensing Authority in line with the timetable agreed within the Monitoring Plan.	See conditions 24(1), 25(7) and 26(4).	No
Mon_054_581_010623	S42/S44	Email	Section 24 (5) This statement appears unclear. Please could you clarify its intention.	The wording of this condition has been revised to align with condition 19(1)(d)(i)(cc)	No





Unique Reference Identifier	S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_054_582_010623	S42/S44	Email	Section 25 NRW MLT would usually expect in 4 months not 6. Should also include the final location and technical specification of the cables, and location of buried and surface laid cables.	Condition 25 of the dML has been updated to reflect this comment.	No
Mon_054_583_010623	S42/S44	Email	No reference has been made to the submission of decommissioning plans under the Marine licence or for a post decommissioning survey which are usually a requirement of the MCA and UKHO.	Please see Marine Licence Principles Document (Document Reference J9).	No
Mon_054_584_010623	S42/S44	Email	NRW MLT would seek that a compliance report is submitted prior to commencement of work that identify how conditions have been and are to be addressed.	Please see Marine Licence Principles Document (Document Reference J9).	No
Mon_054_585_010623	S42/S44	Email	In relation to the disposal activity: The Licence Holder must keep a log detailing the time, date, location (latitude and longitude position (in decimal degrees) of the deposit within the Deposit Area.) and quantity of material deposited at sea. This log must be available for inspection by appropriately authorised officers of the Licensing Authority and Marine Enforcement Officers.	Waste disposal arrangements form part of the offshore environmental management plan secured under condition 18(1)(e).	No
Mon_069_004_010623	S42	Email	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 given its close proximity to Isle of Man waters. In addition, the same would be requested in respect of the marine protected sites and the manner in which these are designated and managed, and key seabird breeding sites, including any transboundary impacts arising from the project.		
Mon_082_002_020623	S47/S44	Email	 The National Policy Statement for Energy reports that coordinated applications bring economic efficiencies and reduced environmental impact. The Offshore Transmission Network Review (OTNR) highlights significant benefit to coordination rather than radial. The 3 work streams of the OTNR Early Opportunities – Encourage developers and interconnectors to coordinate Pathway to 2030 – Point to point connections are not appropriate for the scale and ambition and may present a barrier. Additionally, they impose more impact on the seabed and local communities that host the connection. HND – a report that you refer to as reasoning for connection at Bodelwyddan – Executive summary states that the original radial approach to designing, building and connecting offshore wind farms involves limited coordination. This model is no longer fit for purpose and there is a need to integrate the connections. This project delivers Zero coordination. (Other than having a shared website with your sister development). 		No
Mon_088_029_040623	S42	Email	As the UK moves from a centralised to a decentralised energy supply, and the demand increases the need to strategically plan cable network design is paramount. The needs of the Mona OWF are less significant than the delivery of a future proofed network. It is important that we deliver on climate change mitigation measures but not in a manner which only serves short sighted ambitions.	The Applicants noted your response. Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project	Yes





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				considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	
Mon_002_014_080623	S42/S44	Email	VOLUME 1: CHAPTER 2 – POLICY AND LEGISLATION The Council support the principle of new renewable energy generation and recognise the contribution the proposed windfarm would make towards meeting Welsh Government renewable energy targets and tackling climate change.	The Applicant notes your response	No
Mon_002_015_080623	S42/S44	Email	However, new wind energy development should not be brought forward at any cost. It is noted that a large number of significant effects have been identified in the PEIR across a range of topic areas. The design process is iterative and full consideration should be given to scaling back the geographic spread of the windfarm and the size of the turbines, which may help mitigate the range and extent of significant effects identified, whilst still contributing to renewable energy and climate change goals.	·	Yes
Mon_124_001_200423	S47	Feedback form	National Significant Infrastructure Projects in Welsh waters should come under Welsh Government remit. This project should come under Wales, not England (=UK). As things stand, the revenue from this will go to the UK rather than the people of Wales. Another reason why independence is important. Wales should manage everything to do with Wales, including Welsh exclusive economic zone waters and Crown Estates.	Territorial responsibilities and consenting regimes are a matter for Governments and their agencies. The Applicant can only progress according to current legislation and guidelines.	No



D.25.4 Project description table of responses



Table D.25. 4: Project description table of responses

Unique Reference Identifier	S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_009_001_230423	S44	Email	I am requesting more information about the impact of this project on our property - our address below. Your website seems to indicate that cabling carrying power from the offshore wind farm may travel near to our property as it approaches the substation at Bodelwyddan. I want to know whether this cabling will be above or below ground, the exact route and whether it will directly impact our land or access to our land, and likely construction timelines.		No
Mon_021_005_020523	S47	Email	The Rochdale Envelope (National Infrastructure Planning Advice Note 9) allows a degree of flexibility to address uncertainties. For offshore wind farms it notes (para 4.5) that these may include type and number of turbines. Para 4.12 refers to "robust worst-case scenario(s)," which for offshore wind farms presumably includes overall geographical area for development. Notwithstanding this 'flexibility,' it now appears reasonable to request the developers to justify the actual development areas which they need. To give one specific example, what is the justification for the northern-most corner of Morgan to project apparently unnecessarily into the Douglas - Heysham shipping route?	Volume 1, Chapter 4, Site selection and consideration of alternatives of the Environmental Statement (Document Reference: F1.4) describes the site selection process for the Mona Array Area. It should be noted that following feedback on the PEIR, the Mona Array Area has been significantly revised with revisions to the area in north, east and south and an overall reduction from approximately 450 km² to 300 km²	Yes
Mon_026_001_070523	S47	Email	Stated issues with interpretating the reports and asked for clear information regarding the proposals/timelines for the deployment of the required infrastructure as it hits land on the Llandulas/Pensarn coastline. What will be the nature of the transmission infrastructure (e.g. above/below ground) as it hits landfall and details of the proposed substation?	An indicative programme of construction works is provided in Volume 1, Chapter 3: Project description of the Environmental Statement. Details of the onshore infrastructure including the landfall and onshore substation are presented in Volume 1, Chapter 3: Project description of the Environmental Statement.	No
Mon_029_001_090523	S42	Email	Requested the following: Offshore array Rochdale envelope grid references (must be in BNG 6 Digit Easting/Northings) and (WGS84 Degrees, Minutes, Seconds) Export cable route grid references (WGS84 Degrees, Minutes, Seconds) Landfall grid references (must be in BNG 6 Digit Easting/Northings) Onshore boundary points (must be in BNG 6 Digit Easting/Northings)	Noted. The requested co-ordinates were provided to MOD in May 2023	No
Mon_031_001_090523	S47	Email	We are residents of the Isle of Man and on looking at the map on the card immediately became concerned as the two ports to the east of the Isle of Man which are used by The Isle of Man Steam Packet Company [IOMSPC] are not shown. The immediate implication is that you do not understand the importance to the Isle of Man of the routes to both Heysham and Liverpool. Both shipping routes, used for a very long time by the IOMSPC, are a vital lifeline. Anything which disrupts the regular sailings has massive implications in terms of food supplies and other freight to and from the Island. There is also the other important role provided by the IOMSPC, that of transferring people to appointments/treatment in UK hospitals where the patient is unable to fly. The IOMSPC [founded in 1830] has various longstanding routes used to both Heysham and Liverpool, each depending on prevailing weather conditions. We believe that the consequences of development at the proposed scale will potentially result in longer sailing times and, to ensure avoidance with the wind farms, will result in more frequent cancellations. We are not opposed to the principle of wind farm developments but are totally opposed to any such developments which will adversely impact on the services provided by the Ilse of Man Steam Packet Company. We feel sure that the IOMSPC will be submitting their own response and are confident that it will be more detailed than the above.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project, and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_042_004_260523	S42	Email	Having reviewed the consultation documentation, including the Preliminary Environmental Information Report (PEIR), available at www.morganandmona.com, we are broadly content with the outline proposals	The Applicant notes your response.	No





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			put forward for MOWP and are confident that both schemes (MOWP and AyM OWF) can co-exist. We believe the approach taken by MOWL to minimise the overlap with the AyM OWF Development Consent Order (DCO) boundary is a positive approach, helping to ensure the two projects can co-exist with minimal interaction and, if consented, will both help to deliver clean, green, secure energy supplies to the UK energy system.		
Mon_042_010_260523	S42	Email	Volume 1, Chapter 3 – Project Description · Figure 3.16 of the PEIR details the MOWP PEIR boundary and Onshore Development Area. This illustrates an overlap south of Glascoed Road, within the AyM OWF DCO boundary. We note that this is further refined in Figure 3.20 and that the area which coincides with the AyM OWF DCO boundary will be used for access only.	The Applicant notes your response regarding overlapping DCO boundaries. The Applicant and AyM OWF have held a number of discussions and will continue to discuss how the projects can work together in this area.	No
Mon_042_011_260523	S42	Email	Volume 1, Chapter 3 - It is noted that as part of the design of the onshore works, potential Temporary Construction Compound (TCC) areas have been identified on Figure 3.19 and that one of these locations interacts with the onshore cable route of the AyM OWF project.	The location of the Mona Offshore Wind Project Temporary Construction Compounds (TCCs) have been updated as part of the refinement to the Onshore Cable Corridor. As a result, there is no longer an interaction between the TCCs for the Mona Offshore Wind Project and the Awel y Môr onshore cable route.	Yes
Mon_042_015_260523	S42	Email	Volume 1, Chapter 3 - In summary, Awel y Môr Offshore Wind Farm Limited is pleased that the proposed MOWP scheme has proactively sought to avoid interactions between the two projects and has kept overlap to a minimum. Whilst we have identified some areas worthy of additional review, we believe these to be minimal and that achievable solutions can be found with continuing constructive dialogue. We aim to continue working together to maintain the drive towards greening our energy supplies, building resilient supply chains and providing energy security to the UK market	The Applicant thanks AyM OWF for their response and agrees that continued engagement, on a range of issues, would be helpful to resolving any areas of concern and helping to deliver successful clean energy projects.	No
Mon_047_011_300523	S42/S44	Email	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 Applicant has included protective provisions for the protection of National Grid in the draft DCO.	Yes
Mon_047_015_300523	S42/S44	Email	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	The Illustrative Landscape and Ecology Strategy Plan excludes woodland or tree planting, beneath the overhead lines. Trees that are already in a 40 m wide exclusion zone will be retained. Hedgerows that link the two areas of mature/Ancient Woodland will be retained/restored/created. Wildflower meadows/species rich grassland will be created.	Yes
				The Applicant has included protective provisions for the protection of National Grid in the draft DCO.	
Mon_047_016_300523	S42/S44	Email	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	the draft DCO.	Yes
Mon_047_017_300523	S42/S44	Email	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	The applicant will open negotiations on protective provisions with the affected party. The Applicant has included protective provisions for the protection of National Grid in the draft DCO.	No
Mon_050_006_310523	S42	Email	Layout The turbine layout design will require MCA agreement prior to construction to minimise the risks to surface vessels, including rescue boats, and Search and Rescue aircraft operating within the site. As such, MCA will	The Applicant has committed to two lines of orientation in the layout of structures within the Mona Array Area to address potential impacts on search and rescue and shipping and navigation.	Yes





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			seek to ensure all structures are aligned in straight rows and columns, including any platforms. Any additional navigation safety and/or Search and Rescue requirements, as per MGN 654 Annex 5, will be agreed at the approval stage.		
Mon_050_008_310523	S42	Email	Hydrographic Survey Data MGN 654 Annex 4requires 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. This information will need to be submitted, ideally at the EIA Report stage.	The Applicant notes your response. Final hydrographic survey data will be supplied to MCA Hydrography Manager.	No
Mon_050_009_310523	S42	Email	Cable Routes Export cable routes, cable burial protection index and cable protections are issues that are yet to be fully developed. However due cognisance needs to address cable burial and protection, particularly close to shore where impacts on navigable water depth may become significant. Any consented cable protection works must ensure existing and future safe navigation is not compromised. The MCA would accept a maximum of 5% reduction in surrounding depth referenced to Chart Datum. Where burial depths are not achieved, consultation will need to take place with MCA regarding the locations, impact and potential risk mitigation measures.	The Draft DCO submitted alongside the application secures a condition not to exceed 5% reduction in navigable depth with permission from NRW in consultation with MCA	Yes
Mon_050_010_310523	S42	Email	Safety Zones Safety zones during the construction, maintenance and decommissioning phases are supported, however it should be noted that operational safety zones may have a maximum 50m radius from the individual turbines. A detailed justification would be required for a 50m operational safety zone, with significant evidence from the construction phase in addition to the baseline NRA required supporting the case.	The Applicant notes your response. The Applicants intentions regarding safety zones are set out in the Safety Zone Statement (Document Reference J6) submitted alongside the application.	No
Mon_050_012_310523	S42	Email	Draft Development Consent Order (DCO) The draft DCO has been reviewed and we have the following comments to Schedule 14, Part 2: Condition 14(8) must include Trinity House	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_050_013_310523	S42	Email	Condition 14(11) should be amended to: In case of damage to, or destruction or decay of, the authorised project or any part thereof, excluding the exposure of cables and faults, the undertaker must as soon as reasonably practicable and no later than 24 hours following the undertaker becoming aware of any such damage, destruction or decay, notify NRW, MCA, Trinity House, the Kingfisher Information Service of Seafish and UKHO.	Condition 13 of the dML has been updated to reflect this comment.	No
Mon_050_014_310523	S42	Email	Condition 14(12) should be amended to: In case of buried cables becoming exposed on or above the seabed, the undertaker must within three days following identification of a cable exposure, notify mariners, regional fisheries contacts and the Kingfisher Information Service of Seafish of the location and extent of exposure. Copies of all notices must be provided to the MMO, MCA, Trinity House, and the UKHO within 5 days.	Condition 13 of the dML has been updated to reflect this comment.	No
Mon_050_015_310523	S42	Email	Condition 26 must include MCA, Trinity House and UKHO.	Condition 26 of the dML has been updated to reflect this comment.	No
Mon_051_017_310523	S42	Email	The Maximum Design Scenario (MDS) stated in Table 8.15 is not the same as that stated elsewhere in the report. The MDS stated in the Project Description Chapter should be 107 wind turbine generators (WTG)and four OSPs, whereas 'Increased Suspended Sediment Concentrations (SSCs) and associated sediment deposition' and 'UWN' state 68 WTGs and one OSP is the MSD. Additionally, in Table 3.15, in Volume 1, Chapter 3: Project description, it states the MDS will be jacket foundations with four legs with up to two pin-piles per leg, however three legs with two pin-piles per leg is considered the MDS in document Table 8.16 of Volume 2, Chapter 15: Inter-related effects (offshore). The final report should clearly and consistently state the MDS with respect to	For each of the impacts assessed within the topic chapters (Volume 2, Chapters 1 to 11; Volume 3, Chapters 1 to 11; and Volume 4, Chapters 1 to 4), the MDS is identified from the range of potential options for each parameter within Volume 1, Chapter 3: Project description of the Environmental Statement. The MDS assessed is therefore the scenario which would give rise to the greatest potential impact, and therefore effect, and can vary depending on the impact being assessed.	Yes





Unique Reference Identifier	S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			piling throughout the PEIR when estimating the impacts of UWN and SSC on fish receptors		·
Mon_051_020_310523	S42	Email	Minor Comments 6.5. The impacts of UWN due to unexploded ordnance (UXO) clearance have been briefly assessed withing the PEIR and are to be further assessed within the final report, once preconstruction survey results of UXOs are available. Consent for UXO clearance is usually the subject of a separate marine licence application (MLA). Whether as part of the DCO application or a separate MLA, the MMO expects to see supporting evidence and an appropriate assessment of impacts to fish from UXO to be presented for review. The assessment should include an UWN impact assessment using the hearing threshold guidelines for explosions (Popper et al., 2014).	UXO clearance is included in the application for consent to ensure all pre-construction activities are covered. Underwater sound modelling has been undertaken for UXO clearance and injury ranges are presented to support the EIA and HRA. The hearing thresholds within Popper <i>et al</i> 2014 have been used were appropriate.	No
Mon_051_036_310523	S42	Email	General Comments, Major Comments The MMO notes that during the decommissioning methodology, it is stated that the wind turbines will be cut below seabed level. As this plan involves leaving infrastructure in place, impacts should be assessed for post-decommissioning. This is because any infrastructure will remain a hazard to navigation and fishing gear, preventing future fishing activity in the area, beyond the lifespan of the windfarm.	Piled foundations would likely be cut below the seabed at a level that means they will not create a hazard for fishing or shipping. See Volume 1, Chapter 3: Project description of the Environmental Statement.	No
Mon_054_021_010623	S42/S44	Email	Waste: NRW (A) have no significant issues with the PEIR. We provide advice regarding appropriate mitigation.	The Applicant notes your response	No
Mon_054_027_010623	S42/S44	Email	Cable protection—there is a significant amount of cable protection proposed, which will lead to long-term habitat loss and change of seabed substrate and supporting habitat for other receptors (i.e. birds, benthic). Permanent presence of the rock will potentially alter the seabed sediment transport processes leading to permanent alterations to the seabed morphodynamics. NRW (A)strongly advise that cable protection measures are minimised as much as possible. It is not clear from the PEIR where the cable protection will be required. Once the locations are known, an assessment should be carried out to determine how the cable protection will affect the bed load sediment transport processes. This is of particular importance if located on Annex 1 sand bank systems, given that they are 3m high and will act like a groyne—interrupting the bedload sediment transport if placed perpendicular to the direction of transport. This is particularly relevant in nearshore areas where there is a supply of sediment towards the coast from offshore sand banks. It is fundamental to understand the baseline sediment transport processes close to the coastline and over Annex 1 bank systems, to help inform the assessment of impacts caused by cable protection.	Cable protection will only be used where sufficient trenching depths cannot be achieved. There is a commitment not to place any cable protection in Constable Bank (an Annex 1 habitat outside of a designated site), to minimize cable protection within the Menai Straights and Conwy Bay SAC, and to use trenchless techniques at the landfall so no cable installation will be required in the intertidal area above seabed level. In nearshore areas the use of cable protection will be minimised. Further detail on cable protection measures can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement.	Yes
Mon_054_028_010623	S42/S44	Email	Morphodynamics of Annex 1 Habitats—no assessment has been carried out to determine the impact to the morphodynamics of the Annex 1 sand bank system of Constable Bank and the Menai Strait and Conwy Bay SAC from sand wave clearance and cable laying activities, and the recoverability of the sand waves from such activities. No assessment has been carried out to determine the impact on the form and function of Constable Bank and the Menai Strait and Conwy Bay SAC from long-term placement of cable protection across the sand bank systems. Whilst NRW (A)appreciate that the intention is to minimise sand wave clearance and cable protection on Constable Bank and the Menai Strait and Conwy Bay SAC, we advise assessment of the alteration to the morphodynamics based on the same conditions as the Benthic Ecology assessment (PEIR Chapter 7 Sections7.8.4.6 and 7.8.4.7), that is placement of 39440m2 cable protection on Constable Bank and placement of 28000m2cable protection in the Menai Strait and Conwy Bay SAC.	Cable protection will only be used where sufficient trenching depths cannot be achieved. There is a commitment not to place any cable protection in Constable Bank (an Annex 1 habitat outside of a designated site), to minimize cable protection within the Menai Straights and Conwy Bay SAC, and to use trenchless techniques at the landfall so no cable installation will be required in the intertidal area above seabed level. Sandwave clearance on Constable Bank will be minimised by restricting any sandwave clearance to within the swept path width (20 m) of the cable burial tool, and there will be no sandwave clearance in the Menai Strait and Conwy Bay SAC. No cable protection higher than 70 cm will be installed within in the Menai Strait and Conwy Bay SAC. Additionally, the percentage of export cable requiring cable protection will not exceed 10% of the total length of the export cable within the Conwy Bay and Menai Straits SAC. No more than 5% reduction in water depth (referenced to Chart Datum) will occur at any point along the Mona offshore cable corridor without prior written approval from	Yes





Unique Reference Identifier	S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				the Licensing Authority in consultation with the MCA. Further detail on morphodynamics and measures to address potential impacts to physical processes can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement.	
Mon_054_029_010623	S42/S44	Email	Cable installation to landfall Horizontal Directional Drilling(HDD)—no assessment has been carried out to determine the impacts caused by the HDD option for cable connection to landfall. There is the potential for bentonite clay to be released and advected from the drilling location potentially much further than the coarser intertidal seabed sediments. Exit pits located in the intertidal mayalsorequire cable protection, which could then interrupt the longshore sediment transport processes and reduce the sediment supply down coast, potentially leading to coastal erosion.	Since the submission of the PEIR, open cut trenching has been removed from the project design and all export cables at the landfall will be installed via trenchless techniques, meaning that no cable protection will be required above seabed level in the intertidal area. An assessment of the potential release of bentonite during trenchless techniques has been added to the assessment of increased suspended sediment concentrations and sediment deposition on benthic receptors in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology.	Yes
Mon_054_042_010623	S42/S44	Email	1.1.2.2Volume 1 Chapter 3: Project Description. With reference to Volume 1, Chapter 3: Project Description (and Volume 2, Chapter 6: Physical Processes, Table 6.12: Maximum design scenario considered for the assessment of potential impacts on physical processes), there is a very significant amount of cable protection proposed, which will lead to long-term habitat loss and change of seabed substrate and supporting habitat for other receptors (i.e.birds, benthic). Permanent presence of the rock will potentially alter the seabed sediment transport processes leading to permanent alterations to the seabed morphodynamics. NRW (A) strongly advise that cable protection measures are minimised as much as possible.	Cable protection will only be used where sufficient trenching depths cannot be achieved. There is a commitment not to place any material in the Constable Bank sand banks system or on intertidal areas. In nearshore areas the use of cable protection will be minimised and influence on physical processes will be reduced by the use of tapered mattressing.	Yes
Mon_054_043_010623	S42/S44	Email	It is not clear at this stage where the cable protection will be required. An assessment should be carried out to determine how the cable protection will affect the bed load sediment transport processes, especially if located on Annex 1 sand bank systems, given that they are 3m high and will act like a groyne, particularly if placed perpendicular to the transport pathways. This is of particular relevance in nearshore areas where there is a supply of sediment towards the coast.	Investigations have been undertaken to identify opportunities to limit cable protection on the Constable Bank and within the Menai Strait and Conwy Bay SAC. No cable protection is now required within Constable Bank. No cable protection higher than 70 cm will be installed within in the Menai Strait and Conwy Bay SAC. Additionally, the percentage of export cable requiring cable protection will not exceed 10% of the total length of the export cable within the Conwy Bay and Menai Straits SAC. If and where cable protection is required in shallow subtidal conditions the measures used will be with sufficiently low profile to cause minimal changes to wave, tide and sediment transport. No more than 5% reduction in water depth (referenced to Chart Datum) will occur at any point along the Mona offshore cable corridor without prior written approval from the Licensing Authority in consultation with the MCA. Further detail can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement.	Yes
Mon_054_045_010623	S42/S44	Email	With reference to Section3.6.4 Site preparation activities (Boulder clearance and out of service cables), NRW (A) request clarification of where the boulders will be placed once cleared. We advise that all boulders remain in the marine environment.	Boulders may be picked up one by one and moved to the side of the Mona Offshore Cable Corridor and Access Areas or removed using a plough where boulders will be pushed out of the way. All boulders will remain in the marine environment.	Yes
Mon_054_046_010623	S42/S44	Email	With reference to Section 3.6.14.7 Trenchless Techniques, NRW (A) advise that Horizontal Directional Drilling (HDD)is the preferred option over trenching to install the cable across the intertidal to landfall.	Since the submission of the PEIR, open cut trenching has been removed from the PDE and all export cables at the landfall will be installed via trenchless installation techniques.	Yes
Mon_054_047_010623	S42/S44	Email	With reference to Section 3.13.2 Offshore Decommissioning, NRW (A) are concerned that the intention is to leave the cable and scour protection in situ at the end of the project lifetime in the array area. It is not clear if the cable protection along the cable corridor and at cable crossings will be left in situ. Developers have a legal requirement in the marine environment to remove cable protection through: Requirements to decommission under UNCLOS 1982;•Requirements to decommission under the Energy Act 2004; OSPAR Decision 98/3 on the Disposal of Disused Offshore Installations states that the leaving wholly or partly in place of disused offshore installations within the maritime area is prohibited;•Subsea cabling sector policy of the Welsh National	Decommissioning best practice will be followed at the time of decommissioning. The decommissioning plan and programme will be updated during the Mona Offshore Wind Project lifespan to take account of changing good practice and new technologies. The Applicant's expectation is that all cable and scour protection will not be removed however the EIA has considered removal where this is the MDS (see Volume 2, Chapter 1: Physical processes and Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement).	Yes





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			Marine Plan; and Enhanced biodiversity duty and resilience of ecosystems duty under the Environment (Wales) Act 2016.		
Mon_054_057_010623	S42/S44	Email	Information on the location of the cable protection along the export cable route has not been presented and it is therefore not possible to assess some potential impacts.	Cable protection will only be used where sufficient trenching depths cannot be achieved. There is a commitment not to place any cable protection in Constable Bank (an Annex 1 habitat outside of a designated site), to minimize cable protection within the Menai Straights and Conwy Bay SAC, and to use trenchless techniques at the landfall so no cable installation will be required in the intertidal area above seabed level. In nearshore areas the use of cable protection will be minimised. Further detail on cable protection measures can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement.	Yes
Mon_054_066_010623	S42/S44	Email	Detailed Comments1.2.2.1Volume 1, Chapter 3Project Description With reference to Section 3.6.8.23Scour protection for foundations, NRW (A) advise that the rock used is as similar as possible to that which would naturally occur in the area. Regarding the use of frond mattresses, whilst the principle of fronds accreting sediment is generally beneficial, NRW (A) advise that polypropylene frond mattresses are not used due to the potential for the release of microplastics directly into the benthic environment.	The Applicant will use rock that is similar to the rock that occurs naturally in the area. A range of cable protection is under consideration. The final design will be selected post consent in consultation with stakeholders. Further information can be found in Volume 1, Chapter 3: Project Description of the Environmental Statement.	Yes
Mon_054_067_010623	S42/S44	Email	With reference to Section 3.6.14.3 Intertidal Area, Overview, NRW (A) strongly encourages the applicant to use Horizontal Directional Drilling (HDD) where possible given the potential environmental impacts of open cut trenching on sensitive features found during the intertidal survey. Clarification is sought on whether further geophysical survey data will be available prior to submission of the full ES to understand whether HDD is feasible.	Since the submission of the PEIR, open cut trenching has been removed from the PDE and all export cables at the landfall will be installed via trenchless techniques. Furthermore, the Applicant is committed to ensuring that all construction activities at the Mona landfall associated with the trenchless techniques works will be located outside the clay with piddocks IEF. These measures which have been adopted as part of the Mona Offshore Wind Project will ensure that direct impacts (e.g. habitat loss or disturbance) to the ecologically sensitive and nationally protected clay with piddocks IEF will not occur.	Yes
Mon_054_073_010623	S42/S44	Email	In line with our advice provided through the Expert Working Group (EWG), NRW (A) strongly encourages the applicant not to place any cable protection on Constable Bank and/or the Menai Strait and Conwy Bay SAC. We note in Table 7.16 Measures adopted as part of the Mona Offshore Wind Project, that the applicant is committed to investigating opportunities to limit the extent of cable protection in these areas and that the data gathered via the Summer 2022 survey should help inform this.	As outlined in Table 2.18 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement the Mona Offshore Wind Project has committed to no cable protection within Constable Bank. There will therefore be no long-term habitat loss to this feature. The Benthic subtidal and intertidal ecology technical report of the Environmental Statement has been updated to include the results of the site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Offshore Cable Corridor, including within Constable Bank and the Menai Strait and Conwy Bay SAC. The results of these surveys have demonstrated that there are no designated features of the SAC present in the small area of overlap with the Mona Offshore Cable Corridor. Therefore, there will be no long-term habitat loss to any of the features of the SAC.	No
Mon_054_076_010623	S42/S44	Email	With reference to Section 7.8.1.29-30 and 32Intertidal habitat IEFs (Important Ecological Features), NRW(A) are concerned that the potential impacts from open-cut trenching to intertidal habitats (Verrucaria maura IEF, the Littoral and eulittoral rock dominated by epifaunal communities IEF and the littoral sand and muddy sand supporting infaunal communities IEF) have not been appropriately assessed in the PEIR. The assessment outlined assumes that the impacts from open-cut trenching will be temporary, resulting in temporary habitat loss and/or disturbance as the trench will be infilled. This might be the case if the trench is created via ploughing, where the machine simultaneously closes the trench whilst laying the cable. However, if the trench is opened as a separate activity and subsequently infilled with different sediment/material for example cable mattressing (see Paragraph 71below) and/or left open to be naturally infilled, it is possible that the habitats might not recover and/or take a very long time to recover, potentially resulting in long-term habitat loss. Further information is required to understand exactly what the methodology for the open-cut trenching	Since the submission of the PEIR, open cut trenching has been removed from the PDE and all export cables at the landfall will be installed via trenchless techniques. This measure which has been adopted as part of the Mona Offshore Wind Project will ensure that direct impacts (e.g. temporary habitat disturbance) to intertidal habitat IEFs will be minimised and will be limited to trenchless techniques working areas and machinery, vehicle and personnel movements. Furthermore, the Applicant is committed to ensuring that all construction activities at the Mona landfall associated with the trenchless techniques works will be located outside the clay with piddocks IEF. These measures which have been adopted as part of the Mona Offshore Wind Project will ensure that direct impacts (e.g., habitat loss or disturbance) to the ecologically sensitive and nationally protected clay with piddocks IEF will not occur.	Yes



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			is and how the applicant is planning to infill the trench in the intertidal (including with what material). This is important to understand whether the impacts to intertidal habitats are temporary.		
Mon_054_115_010623	S42/S44	Email	Marine Water and Sediment Quality and Marine WFD1.3.1 Detailed comments With reference to Volume 1, Chapter 3 Project Description, Section 3.6.14.11 Programme, NRW (A) request clarification around why open cut trenching between Mean High-Water Spring (MHWS) and Mean Low Water Spring (MLWS) will take up to 33 months.	Open cut trenching through the intertidal area has now been removed from the project design for the application, See Volume 1, Chapter 3: Project description of the Environmental Statement.	Yes
Mon_054_132_010623	S42/S44	Email	Within Table 8.15, Maximum design scenario considered for the assessment of potential impacts on fish and shellfish ecology, NRW (A) note that the maximum design scenario for underwater noise is for 68 monopiles. However, in Volume 1, Chapter 3 Project Description, Table 3.6 Maximum design parameters: wind turbines, it states that the array will either be of 68x16 m diameter monopiles or 104 smaller wind turbine generators. Whilst NRW (A) agree that larger monopiles may require higher hammer energy and may produce a larger spatial ensonified area, the total duration of piling may increase with the increase in number of piles. NRW (A) advise that this needs to be clarified in the final ES to ensure that a realistic worst case is assessed.	The MDS presented in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement has been updated to reflect the exclusion of monopiles from the project design.	Yes
Mon_054_450_010623	S42/S44	Email	Volume 1 Chapter 3, Project Description With regard to the watercourse crossings in Section 3.7.2.27, any trenched/open cut crossing would require mitigation for any fish species in the vicinity. These crossings would need assessing as to whether fish rescue will be required prior to drying out the works area.	An assessment of the baseline fish status of each watercourse crossed by the Mona Onshore Development Area has been undertaken and presented in Volume 7, Annex 3.15: Fish and eel survey technical report of the Environmental Statement. There will be no requirement for fish rescue as the watercourses traversed have limited fisheries resource or trenchless construction techniques will be used at watercourses where European Eel are present.	No
Mon_054_463_010623	S42/S44	Email	Controlled Water Pollution Prevention Volume 3, Chapter 18 Onshore Ecology From the information provided in Table 18.20 Measures adopted as part of the Mona Offshore Wind Project, NRW (A) note that the Code of Construction Practice (CoCP) is a live document and will be updated as the works commence. The generic details for the pollution prevention measures are suitable to be protective, but more specific details may be required once all the surveys are completed, and the final cable route is set. There is reference made to Control of water pollution from construction sites. Guidance for consultants and contractors(C532D) which is a Construction Industry Research and Information Association (CIRIA) document. A copy of this guidance should be made available for comment. NRW (A) also advise that Guidance for Pollution Prevention 5: Works and maintenance in or near water, and Pollution Prevention Guidelines 6: Working at construction and demolition sites, which are available on the NetRegs website should also be followed.	With respect to onshore ecology, the measures adopted as part of the Mona Offshore Wind Project are provided in section 3.8 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement. This includes the Outline Code of Construction Practice (document reference: J.26), which sets out best practice methods for pollution prevention measures during construction of the Mona Offshore Wind Project.	Yes
Mon_054_470_010623	S42/S44	Email	With reference to Table 18.20 Measures adopted as part of the Mona Offshore Wind Project, NRW (A) note the comment with reference to GCN protected species licence. NRW (A) also advise that provision of temporary hedgerows surveillance and assessments are required to inform the detail of the proposed mitigation including associated dark (unlit) corridors. NRW (A) further advise, regarding provision of an 8 m easement between banks of any water course and any proposed development, that the buffer may need to increase if (a) water vole places of shelter are present; and (b) otter breeding sites/resting places are present	With respect to onshore ecology, the measures adopted as part of the Mona Offshore Wind Project have been reviewed and are provided in section 3.8 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement.	No
Mon_054_528_010623	S42/S44	Email	Waste Any waste materials generated during the proposed development must be disposed of satisfactorily and in accordance with Section 34 of the	Waste generated by the Mona Offshore Wind Project will be managed in accordance with the relevant guidance as set out in the Outline Site Waste and Resource Management Plan (Document Reference J26.9)	No





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			Environmental Protection Act 1990 and NRW relevant guidance on waste management.		
Mon_054_529_010623	S42/S44	Email	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.	Waste carriers will be registered with NRW as set out in the Outline Site Waste and Resource Management Plan (Document Reference J26.9)	No
Mon_054_530_010623	S42/S44	Email	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.	A Discovery Strategy for Contaminated Land is included the DCO application (Document Reference J26.12)	No
Mon_054_531_010623	S42/S44	Email	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.	Waste generated by the Mona Offshore Wind Project will be managed in accordance with the relevant guidance as set out in the Outline Site Waste and Resource Management Plan (Document Reference J26.9)	No
Mon_054_539_010623	S42/S44	Email	NRW MLT note the applicant intends to apply for 3 Marine Licences; one deemed Marine Licence in respect of activities wholly in Welsh Offshore Waters (Schedule 14 of the draft DCO), one in relation to activities in English Waters (Schedule 15 of the draft DCO) and, as detailed above, a separate marine licence application will be submitted to NRW MLT in relation to activities in inshore Welsh waters (within 12nm). NRW MLT note that the parameters provided within both deemed Marine Licences cover the project as a whole (for example Schedule 14 section 3 and 11), rather than detailing specific parameters for each separate Licence. No description of parameters for the licensable activities that will fall in the non-deemed marine licence has been provided. NRW MLT would request that specific parameters are provided for each proposed licence. Where this cannot be achieved at this stage, justification should be provided (for example, currently 107 turbines and 4 offshore substation platforms are included in both deemed Marine Licences, in English Waters and Welsh Waters).	The Applicant has included a deemed marine licence in its draft DCO with regards to construction of the generation assets, inter-array cables, interconnector cables and offshore substation platforms and intends to apply for a standalone marine licence with regards to the export cables, interconnector cables and offshore substation platforms, please see Marine Licence Principles Document (Document Reference J9) for more information. Parameters for the whole off the offshore works are included in Schedule 2, Table 3. Parameters for the elements of the offshore works which are to be included within the deemed marine licence are included in Schedule 14, Part 2, Table 5.	No
Mon_054_540_010623	S42/S44	Email	Each chapter of the PEIR has identified mitigation and monitoring that the applicant considered necessary for the project. NRW MLT would advise that a document is presented that compiles all the mitigation and monitoring proposed within the ES, and identifies where it is proposed these mitigation and monitoring actions are secured, identifying the relevant condition(s) of all the deemed Marine Licences where relevant. This document should also identify which monitoring and mitigation the applicant considers will be relevant to the separate non-deemed Marine Licence	Please see the Mitigation and Monitoring Schedule (Document Reference J10).	No
Mon_054_541_010623	S42/S44	Email	NRW MLT note that no co-ordinates have been provided within the schedules or the DCO in relation to the area of works. NRW MLT recognise that reference has been given in Schedule 14 section (5) to work plans, however NRW MLT consider that the co-ordinates bounding the areas of works covered by each marine licence is required.	Coordinates for the whole of the offshore works are included in Schedule 1, Part 1, Table 1 of the draft DCO. Coordinates for the elements of the offshore works which are to be included within the deemed marine licence are included in Schedule 14, Part 2, Table 3 of the draft DCO.	No
Mon_054_542_010623	S42/S44	Email	NRW MLT note that no expiry date has been given to the licence and that there is no requirement that the decommissioning takes place prior to a specific date. NRW MLT note that within Chapter 1 Introduction, Section 1.4.1.2, reference is made to the 60 years lease from the Crown Estate in connection with the project and also a 35-year design life of the project. Clarification is required regarding the proposed duration of the project, and whether the assessment has been carried out in light of that period. Additionally, clarification is required whether the deemed Marine Licence includes activities associated with decommissioning, as construction operation and maintenance of the project are detailed within the deemed licence however decommissioning is not referred to.	As is standard for DCOs there is no end date specified in the draft Order. As a result, the dML will remain in force until the authorised scheme has been decommissioned in accordance with a programme approved by the Secretary of State under section 106 (approval of decommissioning programmes) of the 2004 Act. The Applicant does not intend for the deemed Marine Licence to cover decommissioning activities.	





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Mon_054_543_010623	S42/S44	Email	Please find below further detailed comments on the draft DCO and deemed Marine Licence. These are not intended to be comprehensive, rather to assist in the development of the deemed Marine Licence. Accordingly, NRW MLT may wish to make further comment at a future stage, and in response to any further information that may be submitted.	The Applicant notes your response.	No
Mon_054_544_010623	S42/S44	Email	Part 6 (43) Service of notices Part 6 (45) Requirements, appeals, etc Part 6 (46) Arbitration Schedule 13 Arbitration rules Clarification is required to the applicability of these provisions to the deemed Marine licence.	Service of notices: Schedule 14, Part 1, paragraph 1(5) of the draft DCO details the notice provisions for the dML. Requirements, appeals, etc: Article 45 only relates to matters under the TCPA 1990 and therefore it does not apply to NRW. Arbitration: article 46(2) has been updated to include NRW such that the arbitration provisions are specifically excluded where there is a dispute between the Applicant and NRW as to any provisions in the Order. Schedule 13 is consequently also excluded.	No
Mon_054_545_010623	S42/S44	Email	Part 2 Section 7(3), and Section 7(10) Schedule 14 –Section 8 - Clarification is required why the DCO is seeking that the ability to transfer the deemed Marine Licence is passed to the Secretary of State (SoS) rather than remaining with NRW as the Licensing Authority. Has this been requested by the SoS?	This is standard drafting for a dML to ensure that the DCO and dML can be transferred together. The SoS is required to consult with NRW before giving consent to any transfer, see Article 7, paragraph (3) of the draft DCO.	No
Mon_054_546_010623	S42/S44	Email	Schedule 14 -Interpretation - Reference is made within the Interpretation, and for the purpose of submission of notification to the Marine Case Management System (MCMS). The MCMS is a case management system used by the MMO and is not used by NRW MLT, reference to this system within the licence should be removed. As referred to above, Welsh Government remain the relevant Enforcement Authority for the purpose of the Marine Licence. This should be made clear within the interpretation, and relevant contact details included. Welsh Government Marine Enforcement contact details are: REDACTED Addresses listed include CEFAS and Cadw, however there is no reference within the licence of any requirements to contact either of these parties, we would therefore advise these are removed.	Reference to MCMS has been removed from Schedule 14 of the draft DCO. Cefas and Cadw have been removed from Schedule 14, Part 1, paragraph 1(5) and Welsh Government Marine Enforcement Officers have been added.	No
Mon_054_547_010623	S42/S44	Email	Section 3 –"In connection with the licensed activities in Work Area 1 and to the extent that they do not otherwise form part of any such work, further associated development comprising such other works as may be necessary or expedient for the purposes of or in connection with the relevant part of the authorised project and which fall within the scope of the work assessed by the environmental statement, including" - NRW MLT consider that this sentence is unclear please clarify its purpose.	This is standard DCO drafting to ensure that the full scope of works assessed as part of the project within the Environmental Statement can be constructed without having to list out every element of those works	No
Mon_054_548_010623	S42/S44	Email	Section 2 (f) - Within existing Marine licences in Wales the disposal site would be designated, and the disposal code and boundary of the disposal site included within the Marine Licence itself. NRW MLTseek further discussion surrounding this point as it appears that the proposal is to designate the disposal site post consent.	It is the Applicants understanding that the disposal site would be designated, and the disposal code and boundary of the disposal site included within the Marine Licence. The applicant is engaged in further discussion on the with NRW-MLT	No
Mon_054_549_010623	S42/S44	Email	Section 2 and 3 - No reference is made to decommissioning activity. Please clarify whether the applicant intends that decommissioning is covered by the Marine Licence.	As is standard for DCOs there is no end date specified in the draft Order. As a result, the dML will remain in force until the authorised scheme has been decommissioned in accordance with a programme approved by the Secretary of State under section 106 (approval of decommissioning programmes) of the 2004 Act. The Applicant does not intend for the deemed Marine Licence to cover decommissioning activities.	No





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Mon_054_550_010623	S42/S44	Email	Section 5-Co-ordinates in latitude and longitude decimal degrees should be provided for the licensable area covered by this licence within which the works consented by this licence will be bounded.	Coordinates for the elements of the offshore works which are to be included within the deemed marine licence are included in Schedule 14, Part 2, Table 3 of the draft DCO.	No
Mon_054_551_010623	S42/S44	Email	Section 7 - See Paragraph 484 above in relation to the duration of the licence.	The Applicant notes your response.	No
Mon_054_552_010623	S42/S44	Email	Section 10 - NRW MLT are unclear what this section is seeking to achieve, please provide further clarification surrounding the intention/purpose of the condition.	The deemed marine licence will be in force for the period of time in which the DCO is in force.	No
Mon_054_553_010623	S42/S44	Email	Section 11 - See Paragraph 481above, NRW MLT consider the parameters should be bespoke to each licence to identify what will take place under each specific licence.	This paragraph deals with potential amendments and variations to the approved details, plans and schemes, which can only be agreed with NRW where it is demonstrated that such amendment or variation is unlikely to give rise to any materially new or materially different environmental effects from those assessed in the Environmental Statement. This approach is entirely in accordance with general planning and Environmental Impact Assessment (EIA) principles and the process routinely undertaken to apply for amendments and variations of any consent in an EIA context.	No
Mon_054_554_010623	S42/S44	Email	Section 11- Table 3NRW MLT cannot find reference to the following parameters within the PEIR Chapter 3 –Offshore project description: •Maximum total rotor swept area (m2) •Maximum total length of cables (inter-array and interconnector) (km)•Maximum number of cable crossings (inter-array and interconnector) (km)Please clarify where these parameters are detailed within the ES.	Rotor diameter, cable length and number of cable crossings are provided in Volume 1, Chapter 3: Project description of the Environmental Statement (see Tables 3.1, 3.6, 3.20 and 3.26). Maximum total rotor swept area (m2) is not a controlling parameter for the purposes of the Application and is therefore not included as a parameter in the draft DCO. Maximum total length of cables (inter-array and interconnector) (km) this parameter is included in Schedule 14, Part 2, Table 3 of the draft DCO. Maximum number of cable crossings (inter-array and interconnector) (km) this parameter is included in Schedule 14, Part 2, Table 3 of the draft DCO.	No
Mon_054_555_010623	S42/S44	Email	Section 12(1) -The undertaker may at any time maintain the authorised project, except to the extent that this licence or an agreement made under this licence provides otherwise NRW MLT consider that this sentence is unclear please clarify its purpose.	This is standard DCO drafting to confirm that the dML includes allow for the general ability to maintain the authorised scheme unless stated or modified elsewhere.	No
Mon_054_556_010623	S42/S44	Email	Section 12(3) "substantially" can be removed	This has been removed.	No
Mon_054_557_010623	S42/S44	Email	Section 13 Please identify any time frames that appear to set a deadline for NRW MLT as Licensing Authority and why. The Licence sets out obligation for the undertaken, we do not consider it appropriate that the licence should set deadlines for the Licensing Authority.	This is standard DCO dML drafting to ensure that the discharge of the dML conditions are achieved within a reasonable timeframe and to avoid delays to the project.	No
Mon_054_558_010623	S42/S44	Email	Section 14 Notifications should be sent to both NRW MLT and the Welsh Government Marine Enforcement Officers (MEO), and likewise provision for inspections should reference both NRW and the MEO.	Condition 13 of the dML has been updated to reflect this comment.	No
Mon_054_559_010623	S42/S44	Email	Section 14(6 and 7) NRW MLT would expect to be informed at least 10 days prior to commencement of the licenced activities.	Condition 13 of the dML has been updated to reflect this comment.	No
Mon_054_560_010623	S42/S44	Email	Section 16(4) NRW MLT would expect disposal returns to be submitted by the 31 January detailing quantities disposed of in July to December, and by the 31 July detailing quantities disposed of between January –June. This is in line with OSPAR reporting requirements on all other disposal licences in Wales.	Condition 16 of the dML has been updated to reflect this comment.	No
Mon_054_561_010623	S42/S44	Email	Section 16(7) This should reference MEO as well as NRW MLT	Noted. This wording has been added to the application DCO and dML	No
Mon_054_562_010623	S42/S44	Email	Section 16(10) NRW MLT do not have a dropped object procedure form, however, NRW MLT would expect notification to be provided.	Approval of a dropped objects plan prior to commencement has been added to condition 18 and reference to notifications being given to NRW of dropped objects in accordance with this plan has been included in condition 16(10).	No





Unique Reference Identifier	S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_054_563_010623	S42/S44	Email	Section 17 Any loss should also be notified to MEO, Trinity House (TH) and Maritime and Coastguard Agency (MCA). In relation to Force Majeure NRW licences usually also include the condition below: Should it be necessary for the Licence Holder to recover or remove from the Licensed Area any equipment, plant or machinery accidentally dropped when undertaking the Licensed Activities, the Licence Holder is permitted to do so provided that the methodology for such recovery or removal has been approved by the Licensing Authority.	Reference to the MEO has been included in condition 17.	No
Mon_054_564_010623	S42/S44	Email	Section 16(10) and Section 17NRW licences usually contain the following standard condition: The Licence Holder must remove any deposited material within one month of notice being given by Licensing Authority or Marine Enforcement Officers if they consider this necessary or advisable for the safety of navigation, and shall not replace such material until the Licensing Authority or Marine Enforcement Officers have given their written approval.	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_054_565_010623	S42/S44	Email	Section 16NRW licences usually contain the following standard condition: The Licence Holder must ensure that plant, vehicles and machinery are not refuelled on the foreshore or in the sea.	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_054_566_010623	S42/S44	Email	Section 18 (2) Is there a reason why the plan showing the area of works and the programme of works are excluded here? If they are excluded what is the proposed timeframe for their submission?	These details will form part of the documents submitted prior to commencement and details in condition 18 of the draft DCO.	No
Mon_054_567_010623	S42/S44	Email	Section 18(4) Is this something that has been requested and agreed with the relevant Statutory Nature Conservation Body (SNCB)?	This is a standard requirement where UXO clearance is licenced, requiring the Applicant to provide a close out report detailing information on the clearance activities. The Applicant has discussed the clearance of UXOs through relevant Expert Working Groups and other technical engagement groups.	No
Mon_054_568_010623	S42/S44	Email	Section 18In relation to activities including Unexploded Ordnance (UXO) clearance and Impact Piling it is expected that information is inputted into the Joint Nature Conservation Committee (JNCC) noise registry.UK Marine Noise Registry a) The Licence Holder must complete an entry into the UK Marine Noise Registry detailing the proposed dates and locations and nature of the [insert activities] at least 10 days prior to its commencement. b)The Licence Holder must amend the marine noise registry proposed activity form should the timing of the [insert activities] alter or no longer remain part of the project. c)The Licence Holder must complete an entry into the Marine Noise Registry detailing the actual dates, location(s) and nature of the [insert activities] every 6monthsfollowing the commencement of [insert activities] until the completion of [insert activities] with the final entry to be completed within 8 weeks of completion of the noisy activity.	A new marine noise registry condition has been added to the dML (condition 29).	No
Mon_054_569_010623	S42/S44	Email	Section 19(1) – "insofar as is relevant to that activity or phase" This gives a level of ambiguity to the condition. The condition should make clear when each plan is required.	This wording is included to make it clear that the undertaker may submit and have discharged a plan that covers the relevant stage or part of the licenced activities rather than the whole of those activities. The plan submitted to NRW would be clear as to the extent of the licenced activities any plan is intended to cover.	No
Mon_054_570_010623	S42/S44	Email	Section 19(1) Reference is made to Plans to be agreed with TH, MCA and UK Hydrographic Office (UKHO). A number of the plans detailed relate to matters outside their remit e.g. archaeology, marine mammals. NRW MLT would advise if reference is made to these organisations, the specific relevant plans should be referred to.	Condition 18(1) states that these bodies will be consulted "as appropriate" so will not need to be consulted on matters outside of their remit.	No
Mon_054_571_010623	S42/S44	Email	Section 19(1)(c) This section sits within Pre-construction plans and documents, however, sets out timeframes for submission of operation monitoring which is proposed to be agreed during the construction phase.	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No





Unique Reference Identifier	S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_054_572_010623	S42/S44	Email	Section 20 NRW MLT are unclear what this section is seeking to achieve, please provide further clarification surrounding the intention/purpose of the condition.	This is a standard ML condition required by MCA.	No
Mon_054_573_010623	S42/S44	Email	Section 21 Notification should also be provided to the MEO.	Noted, this has been added to the application DCO and dML	No
Mon_054_574_010623	S42/S44	Email	Section 22 NRW MLT would suggest the relevant timing for submission referred to in 19(1)(c) is replicated here. This condition refers to the statutory nature conservation body. Clarification is required whether this pre-construction monitoring condition also seeks to ensure adequate navigation, or archaeological surveys and monitoring is agreed or if these are to be achieved under separate conditions.	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_054_575_010623	S42/S44	Email	Section 23(1) NRW MLT would suggest the relevant timing for submission referred to in 19(1)(c) is replicated here. This should specify that works cannot commence until the construction monitoring has been agreed.	Condition 25 follows the timings in condition 18(1)(c) and condition 18(1) includes the prohibition on commencement until construction monitoring has been agreed.	No
Mon_054_576_010623	S42/S44	Email	Section 23(2) Clarification whether monitoring of 4 piles has been requested by the SNCB.	This is a standard condition for offshore wind projects.	No
Mon_054_577_010623	S42/S44	Email	Section 23(7) Suggest reordering so that this comes before Section 23(6) which relates to navigation monitoring.	Condition 25 of the dML has been updated to reflect this comment.	No
Mon_054_578_010623	S42/S44	Email	Section 24(1) NRW MLT would suggest the relevant timing for submission referred to in 19(1)(c) is replicated here. This should specify that operations cannot commence until the post construction monitoring has been agreed by NRW MLT as the Licensing Authority.	Condition 26 follows the timings in condition 18(1)(c) and condition 18(1) includes the prohibition on commencement until post-construction monitoring has been agreed.	No
Mon_054_579_010623	S42/S44	Email	Section 23(3)(a)-(c) Assume these have been requested and agreed with relevant stakeholders.	The Applicant assumes the comment refers to 24(3)(a) -(c) of the dML consulted on at PEIR (as 23 does not include (3)(a)-(c) clauses). Post construction monitoring has been a subject of discussion at relevant Expert Working Groups, or other technical engagement groups. An Offshore in-principle monitoring plan (Document reference J15) has been submitted as part of the DCO application.	No
Mon_054_580_010623	S42/S44	Email	Section 22, 23 and 24All those conditions referring to agreement of monitoring should also specify that environmental monitoring reports must be submitted to NRWMLT for approval of the Licensing Authority in line with the timetable agreed within the Monitoring Plan.	See conditions 24(1), 25(7) and 26(4).	No
Mon_054_581_010623	S42/S44	Email	Section 24 (5) This statement appears unclear. Please could you clarify its intention.	The wording of this condition has been revised to align with condition 19(1)(d)(i)(cc)	No
Mon_054_582_010623	S42/S44	Email	Section 25NRW MLT would usually expect in 4 months not 6. Should also include the final location and technical specification of the cables, and location of buried and surface laid cables.	Condition 25 of the dML has been updated to reflect this comment.	No
Mon_054_583_010623	S42/S44	Email	No reference has been made to the submission of decommissioning plans under the Marine licence or for a post decommissioning survey which are usually a requirement of the MCA and UKHO.	Please see Marine Licence Principles Document (Document Reference J9).	No
Mon_054_584_010623	S42/S44	Email	NRW MLT would seek that a compliance report is submitted prior to commencement of work that identify how conditions have been and are to be addressed.	Please see Marine Licence Principles Document (Document Reference J9).	No
Mon_054_585_010623	S42/S44	Email	In relation to the disposal activity: The Licence Holder must keep a log detailing the time, date, location (latitude and longitude position (in decimal degrees) of the deposit within the Deposit Area.) and quantity of material deposited at sea.	Waste disposal arrangements form part of the offshore environmental management plan secured under condition 18(1)(e).	No



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			This log must be available for inspection by appropriately authorised officers of the Licensing Authority and Marine Enforcement Officers.		
Mon_060_005_010623	S42	Email	General Comments Volume 1, chapter 3: Project description, Rev 04, dated 15/02/2023Table 3.12: Maximum design parameters for monopile foundations -wind turbines. It is unclear where the Maximum Design Parameter for "Seabed area –total foundation and scour protection for all foundations (m2)" derives from. It would be helpful if the calculation could be clarified. This applies to all Maximum Design Parameter Tables within Volume 1, chapter 3. It would be useful if the figures contained within this chapter could be provided along with an explanation of their origin. It is not always clear where the numbers are derived from and what impacts they incorporate? For example, would it be possible to expand on Table 3.22 to highlight what "seabed disturbance –total for installation (m2)" incorporates and how the other figures within this table relate to this overall total. Please see further comments regarding quantification of impacts related to Table 7.14 maximum design scenario considered for the assessment of potential impacts on benthic subtidal and intertidal biology.	Calculations have been added before values in Volume 1, Chapter 3: Project description of the Environmental Statement where relevant to clarify how the value has been arrived at.	No
Mon_060_008_010623	S42	Email	3.6.8.25 Scour protection for foundations JNCC appreciate that multiple types of scour protection, other than rock, have been considered in relation to scour protection for foundations. We are working on the assumption that the same consideration has been given to the cable and crossing protection. JNCC note that the final choice of scour protection will be made after detailed design of foundation structure and that several aspects will be taken into consideration when these decisions are made. The use of scour and cable protection across the Mona area should be minimised as far as possible. Consideration should be given to selecting scour and cable protection that most closely resembles the local environment where this is possible. JNCC would also like to see the potential for removal at decommissioning added to this list of considerations.	The proposed amount of cable protection has been refined from the PEIR to the Environmental Statement. Cable protection will only be installed where considered necessary, and minimised as far as is reasonably practical. With regards to scour protection, the Applicant will try to use rock that is similar to the rock that occurs naturally in the area. Whilst the project design assumes that cable and scour protection may be left in situ, where relevant, the MDS has been updated in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement for impact pathways where the removal of cable protection could represent a greater impact on benthic habitats than leaving it in situ (e.g. permanent habitat loss, introduction of artificial structures etc.).	Yes
Mon_060_009_010623	S42	Email	foundations, states "any scour protection will be left in situ". Yet Volume 2,	Whilst the project design assumes that cable and scour protection may be left in situ, where relevant, the MDS has been updated in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement for impact pathways where the removal of cable protection could represent a greater impact on benthic habitats than leaving it in situ (e.g. permanent habitat loss, introduction of artificial structures etc.).	Yes
Mon_060_010_010623	S42	Email	Volume 2, chapter 7: Benthic subtidal and intertidal ecology7.1.3 Study Area. JNCC note that the incorporation of site-specific surveys for the Mona Offshore Cable Corridor and the Zone of Influence (ZOI) have not been incorporated within the PEIR. While JNCC were aware that this would be the case we would like to highlight that without this information we are unable to provide any meaningful and accurate advice in relation to the cable corridor or ZOI study areas. Assessment of these study areas will be addressed in the Environmental Statement and until such times JNCC is unable to provide comment.	The Benthic subtidal and intertidal ecology technical report of the Environmental Statement has been updated to include the results of the site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Array Area Zol and the Mona Offshore Cable Corridor, including within Constable Bank and the Menai Strait and Conwy Bay SAC. The updated Benthic subtidal and intertidal ecology technical report of the Environmental Statement was submitted to the SNCBs via the Benthic Ecology, Fish and Shellfish and Physical Process EWG on 2 October 2023 (i.e. ahead of the final application) for comment. The results of the 2022 surveys (i.e. the IEFs identified) have been carried through to, and assessed fully in, the Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	Yes
Mon_060_011_010623	S42	Email	7.8.4 Long term habitat loss JNCC note the classification of cable protection as long-term. Given the length of time that these materials will be in place (i.e. at least the project lifetime), JNCC would consider this to result in permanent habitat loss, particularly given the current lack of information on the feasibility of removal.	The MDS is for habitat loss is that cable protection to be left in situ following decommissioning (as this represents the greatest and longest loss of habitat). Therefore the continued presence of cable protection, post-decommissioning, has also been considered as permanent habitat loss in the decommissioning phase of the long term habitat loss impact in section 2.9.4 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	Yes





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Mon_067_005_030623	S42/S44	Email	The ongoing and uninterrupted operation of WoDS is priority, it is therefore requested that proposed survey and outline construction programmes for the new project are shared with Scottish Power Renewables UK Limited (SPRUK) and discussed as soon as possible	The Applicant met with SPRUKL on the 8 November 2023 to discuss these matters	No
Mon_067_006_030623	S42/S44	Email	•SPRUKL would like to request a meeting to understand the project(s) in greater detail and to discuss the potential impacts on: o Wake effects on existing developments and commercial compensation considerations	The Applicant met with SPRUKL on the 8 November 2023 to discuss these matters	No
Mon_070_023_010623	S42	Email	The Council also confirms that it would welcome the opportunity to engage and advise on Supply chain Plan that will form a requirement of the Contract for Difference (CfD) application process.	The Applicant notes your response. Regional opportunities for engagement will be publicised at the appropriate time	Yes
Mon_070_024_010623	S42	Email	2. Community Fund: Offshore Wind Farms often provides a community fund as part of the development. Such funds involve an annual payment being made by the developer to those communities hosting the development. Funds are used to allow the communities surrounding a wind farm to benefit by investing in local initiatives or people.		Yes
Mon_070_025_010623	S42	Email	The Council has adopted a Community Benefit Contributions Strategy1 which provides developers with confirmation of the Councils aspirations in relation to securing community benefit from major energy developments. The strategy aims to maximise local benefits from such major developments to support the long-term sustainability, quality of life and wellbeing of the Island and its communities.	The applicant notes your response	Yes
Mon_070_026_010623	S42	Email	The Council would welcome the opportunity to discuss the possibility of setting up a community fund as part of the Mona Offshore Wind Farm further with you to benefit the North Wales region and those communities that will host and be impacted by the development across all of the project phases.	The Applicant notes your response. Further engagement will be undertaken with local and regional partners at the appropriate time to ensure that socio-economic benefits for the region are maximised and aligned in so far as possible	Yes
Mon_070_027_010623	S42	Email	3. Potential use of Holyhead Port It is noted that the PEIR does not specify the final selection of ports, potential manufacturing and fabrication facilities, and delivery models required for the Morgan Offshore Wind Project. It is understood that BP and EnBW is currently exploring options in relation to ports, supporting infrastructure and labour markets in order to understand the potential capabilities, capacities and availability that exists.	A single port or multiple ports could be used to support the Mona Offshore Wind Project. The final port(s) have not been chosen at the time of application.	Yes
Mon_071_019_020623	S42	Email	Helicopter activity It is difficult to quantify the level of impact helicopter usage during the construction and operation of the Mona Offshore Wind Project. It is noted that the PEIR highlights that there may be 2 helicopter supports completing 365 return trips during installation works. No heliport site(s) or transit route(s) have been identified within the PEIR documentation. We would appreciate if more information on this could be provided so we can	Noted. Helicopter operations will be conducted in Class G (uncontrolled airspace) in Visual Meteorological Conditions (VMC) under normal Rules of the Air and the 'See and Avoid' principle. Daily construction, operation & maintenance helicopter movements, conducted below 5,000 ft above mean sea level (amsl), are likely insignificant compared to current Irish Sea Class G aviation activity. Heliport site(s) yet to be confirmed.	No
			properly understand and respond to the potential impacts and mitigations being proposed.		
Mon_088_012_040623	S42	Email	WTW accepts that the project description is indicative, and refinement is to be expected in line with the Development Consent Order (DCO) process, but the WTW encourages pre-examination transparency with respect to receptor impacts identified under the MDS approach.	The Applicant would welcome the opportunity to engage further with WTW prior to commencement of the examination	No
Mon_088_028_040623	S42	Email	WTW advocates that the developer commits to developing a Cable Specification and Installation Plan (CSIP) which will contain a Cable Burial Risk Assessment (CBRE).	Development and adherence to a CSIP which includes a CBRA is secured within the deemed marine licence in schedule 14 of the Draft DCO (document reference: C1) and is expected to be secured within the standalone NRW marine licence.	No





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Mon_002_017_080623	S42/S44	Email	Temporary construction compounds/haul roads – These should be designed with sustainable drainage and accommodate flight corridors of bats/birds by providing mitigation measures. In addition any lighting should be low level where possible to protect bats/birds.	Appropriate drainage will be provided at temporary construction compounds prior to their use (see the Outline Construction Surface Water and Drainage Management Plan (Document Reference J26.6). Construction lighting will provided in line with guidance (see the Outline Artificial Light Emissions Plan (Document reference J26.10).	No
Mon_002_031_080623	S42/S44	Email	The Council do not agree to the working hours of 7am -7pm in locations close to residential properties, and working hours should instead be restricted to 8am – 6pm where working areas are close to residential receptors, with no working on Sundays or Bank Holidays. Where exceptional circumstances require construction works to be carried out outside of approved hours of operational, this should be agreed in writing by the local planning authority at least 48 hours in advance and such provision should be embedded in the Requirements (please see comments above on draft DCO Requirements).	Noted, these comments have been considered in the drafting of the DCO application. The proposed working hours have been assessed in the ES. The Outline Communications Plan (Document Reference J26.4) includes details how local authorities and local residents will be informed of any work that needs to take place outside the agreed working hours.	No
Mon_002_032_080623	S42/S44	Email	The Council also consider community engagement should be a priority throughout the construction phase. A communications plan should be required to be submitted as part of the Code of Construction Practice, which should set out a protocol for communicating with affected local communities throughout the construction phase, including proposals to notify affected residents in advance of noise / vibration generating works commencing, and a complaints management and resolution procedure should be established. A single point of contact should be provided for the local community to contact throughout the construction phase.	An Outline Communications Plan is included in the DCO application (Document Reference J26.4).	No
Mon_015_002_160623	S42/S44	Email	Working corridor The Council notes that the working corridor identified in the PEIR is very broad and that further refinement is required to identify constraints and assess the impacts of the proposal.	The Mona Onshore Development Area has been refined and an updated assessment of impacts based on the refined boundary has been provided in the Environmental Statement.	Yes
Mon_123_003_100723	S42	Email	The development itself seems to have quite a large carbon footprint, even though it is offset eventually by the electricity generated by the turbines. What is the lifespan of the turbines? Rather than de-commissioning can the turbines be replaced.	The type of turbines has not been selected at this stage so the lifespan cannot be confirmed. For the purpose of the climate change assessment, it is assumed that the project will be decommissioned after 35 years. Details of the carbon payback period (an estimate of how long it will take a renewable energy project to offset the greenhouse gases emitted as a result of its construction (the "carbon cost") and begin displacing grid-based electricity generated from non-renewable sources ("the carbon saving") is presented in Volume 4, Chapter 2 Climate change of the Environmental Statement.	No
Mon_149_004_260523	S47	Feedback form	Cable routes will need to be hidden and not disruptive to residents.	The onshore cable route has been refined to avoid impacts to residents where possible. All onshore cables will be buried underground.	Yes
Mon_157_003_010623	S42	Feedback form	From an ENPA viewpoint, we think it, its worth expressing our views, and slight concerns at this point, about the scale of this development and in particular the cumulative effect in combination with existing developments at Gwynt y Môr, Rhyl Flats, North Hoyle and the potential for the large scale development at Awel y Môr . The 'cone' of sight being taken up currently from viewpoints within the National Park was already going to be increased substantially following the potential Awel y Môr development (in addition to current wind farms), and the Mona project will add to that.	The cumulative visual effect of the Mona Offshore Wind Project and other projects have been assessed in Volume 2, Chapter 8: Seascape and Visual Resources of the Environmental Statement	No
			The current turbines at Gwynt y Môr are 150m to tip height, and there are around 160 turbines. For Rhyl Flats there are 25 turbines.		
			The proposed development at Awel y Môr is for between 34 and 50 turbines,		



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			with a proposed maximum tip height of 332m. The obvious point to make is that the tip height of the proposed turbines are more than double the height of the existing turbines at Gwynt y Môr.		
Mon_158_009_020623	S44	Feedback form	Use a Holistic Design Approach considering Cefn Meiriadog community cumulative effects sooner rather than later. You have not done this.	Mona Offshore Wind Project was scoped into National Grid's Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No
Mon_161_004_020623	S47	Feedback form	What are your plans for the roman roads you are crossing	Crossing locations and the proposed techniques are identified in Volume 5, Annex 4.3: Onshore crossing schedule of the Environmental Statement	No
Mon_164_001_040623	S44	Feedback form	I believe the construction of this project should make a greater effort to bring the power line ashore much closer to the Bodelwyddan site of the transformer construction, or better yet connect to existing power lines bring power ashore from existing wind farms in this area.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No
				cable corridor. Details of the site selection process to identify the landfall location can be found in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference: F1.4)	
Mon_176_001_230423	S47	Consult Online	Is the solid green block where the turbines will be and what is the distance from Llanddulas.	The wind turbines will be located within the Mona Array Area (green on figures presented at PEIR). The offshore export cables will make landfall at Llanddulas.	No
			Can they and the cables be repaired easily in the event of an attack	Volume 1, Chapter 3 Project Description of the Environmental Statement details how cables will be repaired if require during the operations and maintenance phase of the Project.	
Mon_180_002_280423	S47	Consult Online	Second objection with declining workforce due to ageing are there enough people to maintain these windfarms in the way going forward in 20/30 years?	The Applicant believes there will be significant levels of opportunities created for businesses operating in - and supplying goods and services to - the offshore wind industry in North Wales. It also recognised there are existing levels of expertise and experience that can be engaged in the short and medium term. To address longer term resource requirements, the application has produced an Outline Skills and Employment Plan (Document Reference J.24)	No
Mon_183_007_110523	S47	Consult Online	Ground conditions were hard at Gwynt Y Mor, some monopiles didn't make depth due to ground conditions, careful site investigation needs to be undertaken at each potential piling site.	Noted. Extensive ground surveys will be carried out at each piling location. Following the PEIR, the monopile foundation option has been removed and gravity base foundations and jacket foundations on pin-piles or suction buckets retained. Further information on the foundation options is presented in Volume 1, Chapter 3: Project description of the Environmental Statement (document reference F1.3).	No
Mon_197_009_190623	S44	FREEPOST	The schematic cross section, is very miss leading in relation to its scaling, one has to read the paper work to get any dimensions/scales of components, wind turbines average 300m high above sea level (this will fluctuate in relation to tide conditions)	The overview of the Mona Offshore Wind Project schematic is intended to present project infrastructure visually rather than providing a scaled drawing of the whole project. The maximum dimensions of the project infrastructure are included throughout Volume 1, Chapter 3: Project description of the Environmental Statement. A scaled figure of where the infrastructure will be is presented in the Works plan offshore and Works plans onshore	No





Unique Reference Identifier	S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_197_010_190623	S44	FREEPOST	The Mona substation that is to be in the region of 20m high is not reflected against the national grid pylons which are average 36m high, does this mean the substation building is going to have a basement, with excavated material to be used for building embankments and landscaping to hide (this is not indicated on the cross section) at the presentations I requested further detail but told not developed yet, in relation to the substation compound and building, based on all of the documentation should this not be in place for presentations and planning purposes, or is there going to be a second development of paper work for submission to Denbighshire CC Planning, and we as residents in the area, not getting the full truth of the details.	The parameters for the Mona Onshore Substation have been refined since the statutory consultation, with the maximum height now 15m AOD. The substation will not be the same height as the national grid pylons. Further information on the design of the onshore substation and associated landscaping is provided in the Design Principles document (Document Reference J3).	No
Mon_197_016_190623	S44	FREEPOST	In relation to site 7, the one I am more interested in, I have been advised of 2 No sizes, 100m x 140m, (if you scale using the shortest dimension, the longest dimension is 180m) in some of the literature we have a dimension of 40m x 80m, which is correct makes a great difference	Onshore Substation Option 7 has been discounted following the statutory consultation	Yes
Mon_197_023_190623	S44	FREEPOST	In relation to engineering the impact can be lessened by the structure having a basement and the surplus arisings used for land scape bund, with today's technology and construction methods the basement could be a minimum of 10m deep	The Applicant thanks the consultee for their response and notes that onshore Substation Option 7 has been discounted following the statutory consultation.	Yes



D.25.5 Site selection and consideration of alternatives table of responses.



Table D.25. 5: Site selection and consideration of alternatives table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_010_001_230423	S44	Email	According to your consultation maps, our house is within Work Area 14 (Engine Hill) of the Mona onshore project. We cannot find any details online about what this might mean in practice. Could you enlighten us?	This area has now been removed from the order limits.	Yes
Mon_035_001_120523	S44	Email	With Grade II Star Plas Newydd in Cefn Meriadog being my family home the findings gave me great concern although I was very pleased to learn from you that Option 5 had in fact been eliminated even though it was highly irregular considering the circumstances. I have to say that there seemed to be no logic in the finding to put Option 5 on the short list. The comments completely contradicted the conclusion. Added to that, I am afraid to say the précis were also grammatically and spelling wise of a surprisingly low standard which all together gave one little confidence that a proper conclusion could ever be arrived at. That these reports still appeared live in print is even more astonishing and makes a mockery of the Consultation process. This is further disappointing as up till then I had a high opinion of the manner in which this consultation was being carried out following that by Scottish Power Manweb for the previous National Infrastructure Project in our area. How on earth was this allowed to come about? I sincerely trust that there will be explanations, repercussions for all those responsible and apologies for mislead consultees. Had trouble making direct contact via the information on the website. It was only through dealings with Dalcour Maclaren over environmental matters that I was able to contact yourself and actually talk to someone about the project for which I was relieved and grateful.	In order to ensure the consultation information was available to as many people as possible, many different methods were used, including but not limited to a	
Mon_035_002_120523	S44	Email	it would be helpful if it is possible to also establish why Options 5 & 6 are missing from Table 4.20 on Page 49 of Vol 1 Chapter 4.	Options 5 and 6 are missing from Table 4.20 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the PEIR due to a drafting error. This has been corrected for the Environmental Statement - see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference: F1.4)	No
Mon_042_005_260523	S42	Email	As both projects share the same grid connection point there will inevitably be a degree of physical interaction during the onshore construction phase of the projects. However, AyM OWF will work with MOWL throughout the process and seek to minimise the effects of interactions upon each project, whilst ensuring the projects can be delivered in an efficient manner.	The Applicant notes your response regarding potential overlap between the Awel y Môr OWF and the Mona Offshore Wind Project. The Applicant and Awel y Môr OWF have held a number of discussions and will continue to discuss how the projects can work together to reduce interactions and deliver both projects efficiently.	No
Mon_042_011_260523	S42	Email	Volume 1, Chapter 3 - It is noted that as part of the design of the onshore works, potential Temporary Construction Compound (TCC) areas have been identified on Figure 3.19 and that one of these locations interacts with the onshore cable route of the AyM OWF project.	The location of the Mona Offshore Wind Project Temporary Construction Compounds (TCCs) have been updated as part of the refinement to the Onshore Cable Corridor. As a result, there is no longer an interaction between the TCCs for the Mona Offshore Wind Project and the Awel y Môr onshore cable route.	Yes
Mon_042_012_260523	S42	Email	Volume 1, Chapter 3 - We consider that any proposals to locate a TCC within the AyM OWF DCO boundary and above the 400kV cable of AyM OWF requires detailed consideration. AyM OWF is happy to engage with MOWP further regarding this matter.	The location of the Temporary Construction Compounds have been updated as part of the refinement to the Onshore Cable Corridor. As a result, there is no longer an interaction between a TCC for the Mona Offshore Wind Project and the onshore cable route of Awel y Môr OWF. Please see Volume 1, Chapter 3: Project Description for details of the locations of Temporary Construction Compounds.	Yes
Mon_042_013_260523	S42	Email	Volume 1, Chapter 3 - We note that the proposed cable routes into National Grid's Bodelwyddan substation encroach on AyM OWF's works areas and we aim to continue dialogue with MOWP to allow both projects to be constructed, operated and maintained alongside each other in this area.	The 400kV Grid Connection Corridor has been refined to avoid encroachment into the Awel y Môr OWF work areas, although there is some overlap around the extension to the existing Bodelwyddan substation. Notwithstanding this, the	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				Mona Offshore Wind Project will continue its open discussions with the Awel y Môr project.	
Mon_043_001_290523	S42	Email	Requested engagement with SP Energy Networks to avoid impacts to the network. SP Energy Networks requests that the applicant provides as soon as possible an overlay plan showing SPM assets and the proposed DCO limits which would be the clearest way of showing the crossover points in detail with a schedule explaining what the crossover is. SP Energy Networks needs assurances that any affected network requiring to be diverted is, once identified, included in the EIA and properly assessed and reported. Where necessary, any related consents for diverting network is included in the DCO. SP Energy Networks would wish to see specific protective provisions in this DCO as it has secured in similar DCOs. As such, the applicant is asked to continue to work with SP Energy Networks and agree as many areas of possible through the application stages.	It has been identified that SP Energy Networks assets are located within the order limits of the MOWP. The Applicant remains in ongoing dialogue with SP Energy Networks to ensure its assets are correctly identified and, where necessary, appropriate mitigation is put in place.	No
Mon_043_002_290523	S42	Email	SPEN have requested the following: - show on suitable plans where direct and indirect impacts from the new development on SPM network will arise	It has been identified that SP Energy Networks assets are located within the order limits of the MOWP. The Applicant remains in ongoing dialogue with SP Energy Networks to ensure its assets are correctly identified and, where necessary, appropriate mitigation is put in place.	No
Mon_044_001_290523	S47	Email	Objects to the project based on any encroachment on views from Southport area/Morecambe bay area.	Private views are not a planning matter (unless effects are over and above substantial adverse). It should be noted that following statutory consultation on the PEIR, the Mona Array Area was revised which resulted in an increase in the minimum distance to the coast of England to 46.5 km. A full assessment of impacts to views as a result of the installation of the turbines is provided in Volume 2, Chapter 8 Seascape and visual resources of the Environmental Statement.	Yes
Mon_044_002_290523	S47	Email	I pay extra Council Tax for my view. Therefore, are you going to compensate me for the loss of my view??????	Private views are not a planning matter (unless effects are over and above substantial adverse). It should be noted that following statutory consultation on the PEIR, the Mona Array Area was revised which resulted in an increase in the minimum distance to the coast of England to 46.5 km. A full assessment of impacts to views as a result of the installation of the turbines is provided in Volume 2, Chapter 8 Seascape and visual resources of the Environmental Statement.	Yes
Mon_044_003_290523	S47	Email	I have worked 45 years and now that I am retired, I DO NOT WANT TO SEE OFFSHORE WIND FARMS WHEN I LOOK OUT TO SEA. I WANT TO SEE THE SEA NOT WHITE POLES STICKING UP HERE THERE AND EVERYWHERE.	Private views are not a planning matter (unless effects are over and above substantial adverse). It should be noted that following statutory consultation on the PEIR, the Mona Array Area was revised which resulted in an increase in the minimum distance to the coast of England to 46.5 km. A full assessment of impacts to views as a result of the installation of the turbines is provided in Volume 2, Chapter 8 Seascape and visual resources of the Environmental Statement.	Yes
Mon_047_003_300523	S42/S44	Email	Due to the proximity of some of our assets and interests, NGET wishes to express their interest in further consultation while the impact on our assets is still being assessed.	The Mona Offshore Wind Project is committed to further consultation with NGET as part of the examination process.	No
Mon_047_010_300523	S42/S44	Email	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).	The location, orientation and layout of the onshore substation has been purposefully sited and has reduced the height and scale of the onshore substation buildings, as well as micro-siting the substation platform to ensure clearance distances from overhead lines are adhered to in line with EN 43-8. For details of the site selection process for the siting and orientation please see Chapter 1, Volume 4: Site Selection and Consideration of Alternative. The design of the substation is outlined in the Design Principles Document	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				(Document reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline LEMP (Document J22).	
				The Applicant has included protective provisions for the protection of National Grid in the draft DCO.	
Mon_047_011_300523	S42/S44	Email	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 Applicant has included protective provisions for the protection of National Grid in the draft DCO.	Yes
Mon_047_013_300523	S42/S44	Email	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.	The location, orientation and layout of the onshore substation has been purposefully sited and has reduced the height and scale of the onshore substation buildings, as well as micro-siting the substation platform to ensure clearance distances from overhead lines are adhered to in line with EN 43-8. For details of the site selection process for the siting and orientation please see Chapter 1, Volume 4: Site Selection and Consideration of Alternative. The design of the substation is outlined in the Design Principles Document (Document reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline LEMP (Document J22).	Yes
-				The Applicant has included protective provisions for the protection of National Grid in the draft DCO.	
Mon_047_017_300523	S42/S44	Email	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	The applicant will open negotiations on protective provisions with the affected party. The Applicant has included protective provisions for the protection of National Grid in the draft DCO.	No
Mon_048_001_310523	S44	Email	Property consultant seeking clarity on a property that may potentially be affected by the development.	The project land consultant, Dalcour Maclaren, confirmed directly the interest in land and location within the PEIR boundary. Following refinement of the onshore development area the property in question is no longer affected by the project.	Yes
Mon_052_002_010623	S44	Email	As you can see from the questions that I raised during the webinar the critical issue for myself and the fishery business is the absolute need to protect the surface and underground water sources that supply the fishery lakes from any form of temporary or permanent disruption. To this end we are very keen to engage with the Mona team in determining what surveys and detailed further investigations you plan to undertake to then allow you to develop your detailed construction strategy such that you guarantee our water sources are protected. We see the engagement process with your team as being very much an interactive and at the same time an iterative one that will allow both sides to gain a full appreciation of the issues as they affect the fishery.	Following the statutory consultation, the Onshore Cable Corridor has been refined to deselect options along the Onshore Cable Corridor and to reduce the width of the corridor. The refinement process was informed by comments received during the consultation process and by engineering design. The refined Onshore Cable Corridor is now further away from Tan-y-Myndd Trout Fishery Ltd.	Yes
Mon_052_003_010623	S44	Email	A further matter of concern to us is the potential impact the execution of the works local to the fishery may have on our customer experience and of course the trading position of the business. Again, we are willing to work with your design and construction teams to ensure that any such impact is either avoided or as a minimum significantly mitigated	Following the statutory consultation, the Onshore Cable Corridor has been refined to deselect options along the Onshore Cable Corridor and to reduce the width of the corridor. The refinement process was informed by comments received during the consultation process and by engineering design. The refined Onshore Cable Corridor does not pass in proximity to Tan-y-Myndd Trout Fishery Ltd. This de-selection of Onshore Cable Corridor optionality was communicated in the announcement newsletter in Autumn 2023.	Yes
Mon_052_004_010623	S44	Email	It would be most helpful if, at the earliest opportunity, you could outline to us your proposed timetable for future engagements with the fishery.	We do not envisage that the Mona Offshore Wind Project will have an impact on this business moving forward as the project boundary has been refined resulting in this land interest now being removed from the Mona Onshore Development Area.	





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Mon_052_005_010623	S44	Email	Rest assured, that while we are fully prepared to work with your team. Should it become apparent to us that at anytime our interests are at risk, we will look to the Mona Project to fully compensate us for any additional costs we may incur in protecting our business interests, be that in the short or long term.	We do not envisage that the Mona Offshore Wind Project will have an impact on your business moving forward as the project boundary has been refined resulting in your interest now being removed from the boundary.	Yes
Mon_054_382_010623	S42/S44	Email	With reference to Volume 1, Chapter 4 Site selection and alternatives, Section 4.5.3.2, although seascape, landscape and visual constraints are cited as having informed siting of the 'Mona Offshore Wind Project', no evidence is provided to explain how these constraints have informed the proposals for the Mona Array Area. There is no reference to NRW's evidence base: "Seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance" which includes guidance on what a developer needs to consider and do to minimise seascape and visual impact.	Key guidance documents relevant to site selection for offshore wind were reviewed in preparing a suitable agreement for lease area for submission into the Round 4 bidding process. This included the NRW 2019 guidance referred to, and other guidance such as Marine Guidance Note (MGN) 654 which relates to shipping and navigation. As explained within Volume 1, Chapter 4 Site selection and consideration of alternatives of the Environmental Statement, constraints analysis of human, physical and biological constraints was undertaken to identify an area for submission into the Round 4 bidding process that was most suitable on balance of all existing and potential constraints.	No
Mon_054_383_010623	S42/S44	Email	Paragraph 4.8.1.3 states that further refinements of the Mona Array Area will take place between PEIR and application submission. As noted above, NRW (A) advise that refinements to the Mona Array Area are necessary to minimise adverse effects on the Isle of Anglesey AONB and Eryri National Park.	Noted. The geographic extent of the Mona Array Area has been revised since PEIR with reductions to the southern and southwestern boundaries that has increased the separation distance from the Anglesey coast.	Yes
Mon_054_385_010623	S42/S44	Email	Table 26.3 / Paragraph 5.9.8, refers to the Overarching National Policy Statement for Energy (NPS EN-1), which sets out a requirement for projects to be designed carefully, taking account of the potential impact on the seascape and landscape. The aim is to minimise harm to the seascape and landscape, providing reasonable mitigation where possible and appropriate. NRW (A) do not consider that sufficient evidence has been provided to demonstrate that seascape, landscape, and visual impacts have been minimised in this case. Further work on this aspect is advised in the Environmental Statement (ES).	Offshore, the geographical extent of the array area has been reduced since PEIR. Onshore, the Onshore Substation parameters have been reduced where possible. An Outline Landscape and Ecological Management Plan (LEMP) (Document Reference J22) accompanies the Environmental Statement. The Illustrative Landscape and Ecology Strategy Plan will be secured by the Outline LEMP, which will be a requirement of the DCO. The outline of the Landscape Strategy and Outline LEMP was discussed with the Design Council for Wales (17 August 2023).	Yes
Mon_055_003_010623	S42/S44	Email	Asset Protection The proposed development site is crossed by public sewers and watermains. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times. No part of any building or operational development will be permitted within 3 metres either side of the: 180mm combined MDPE rising main (292292.56, 378213.11). 4" upvc watermain (294423.36, 378676.41). 525mm foul conc sewer (294586.11, 378565.99). 32mm MDPE watermain (294575.32, 378586.40). 63mm MDPE watermain (94591.51, 378588.76). 4" uPVC watermain (292147.85, 378079.10). 3" CI watermain (291717.48, 378061.56). 100mm uPVC foul sewer (292837.92, 378026.48). 3" uPVC watermain (292268.71, 375532.36). 3" CI watermain (292735.70, 374831.21). 3" CI watermain (293622.97, 373715.42). 3" uPVC watermain (294531.70, 373261.93). 2" watermain (294706.33, 373295.01). 8" abandoned raw watermain at (297788.92, 373023.15).	The location of existing water management infrastructure has been taken into account in the site selection and refinement of the design (see Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement). The Applicant has included protective provisions for the protection of Welsh Water in the draft DCO.	No





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			• 6", 8", 10", 200mm watermains (299242.88, 374048.84).		
			• 90mm MDPE watermain (300411.23, 373355.20).		
			• 90mm MDPE watermain (300353.37, 372785.03).		
			• 280mm HPPE, 500mm DIEL, 500mm GRP watermain (301119.75, 373661.25).		
			• 225mm surface water and VC foul sewers (301555.46, 373804.27).		
			• 150mm and 225mm combined sewers (303449.45, 373816.32).		
			• 10" CI, 280mm HPPE 5" CI, 500mm abandoned GRP, 350mm DIEL watermains (303147.85, 373829.49).		
			• 150mm VC foul sewer (301690.85, 371603.71).		
			• 90mm MDPE watermain (301965.38, 371258.66).		
			• 63mm MDPE watermain (301729.89, 371103.77).		
			• 32mm MDPE watermain (301305.51, 371212.07).		
Mon_055_004_010623	S42/S44	Email	We also note that the proposed site is located within the vicinity of our freehold ownership sites namely Glascoed water tank, we request that this proposal does not encroach on this site and associated infrastructure.	It has been identified that no land in the freehold ownership of Welsh Water has been included in the order limits of the Mona Offshore Wind Project. The Applicant remains in ongoing dialogue Welsh Water to ensure its assets are correctly identified and, where necessary, appropriate mitigation is put in place.	No
Mon_055_005_010623	S42/S44	Email	Our strong recommendation is that your site layout takes into account the location of the assets crossing the site and should be referred to in any master-planning exercises or site layout plans submitted as part of any subsequent planning application. We also request an accurate location plan of the proposed pipeline so that we can assess its impacts on our infrastructure further. Further information regarding Asset Protection is provided in the attached Advice &	The location of existing water management infrastructure has been taken into account in the site selection and refinement of the design (see Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement).	No
			Guidance note.	The Applicant has included protective provisions for the protection of Welsh Water in the draft DCO.	
Mon_066_039_020623	S42	Email	The above link also provides access the Nature Conservation Considerations and Environmental Best Practice for Subsea Cables for English Inshore and UK Offshore Waters. This project provides Natural England and JNCCs joint environmental best practice advice for subsea cable projects in English inshore and UK offshore waters.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_040_020623	S42	Email	It is the expectation that developers follow our Best Practice through the application and consenting process. As such our advice and recommendations to the PEIR are framed around this advice.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_069_010_010623	S42	Email	Ørsted proposed offshore windfarm agreement for lease - The TSC wishes to point out that there is an Afl with 0rsted 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 (committed and proposed). This is particularly of interest with respect to the hard constraints identified by The Crown Estate in Table 4.1 (in Site Selection Chapter) It is acknowledged that the 0rsted site is not related to a Crown Estate lease, however, the principles of proximity should continue to apply and it should have been included for context.	The Mooir Vannin Offshore Wind Farm Scoping Report was published in October 2023. Accordingly, the Mooir Vannin Offshore Wind Farm is considered in the cumulative effects assessment as a Tier 2 project, where relevant.	No
Mon_074_001_060623	S47	Email	Hello, I am contacting you to enquire about the geophysical survey carried out at the Gwrych Castle Woods recently in relation too old mine workings. Is the survey in the public domain yet, and if not, when is it likely to be? Many thanks,	The results of the geophysical survey are reported in Volume 7, Annex 5.3: Onshore geophysical survey report of the Environmental Statement.	No





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Mon_075_001_020623	S44	Email	Dear Sirs, I would like to contribute towards the statutory consultation process on behalf of REDACT and REDACT and REDACT relating to land covered by Works 19 and circled red on the plan below (refer to response). It is understood that this land is being considered for a temporary working area and in connection with works 19 to support the route alternative works 9B. it is pleasing to note that route alternative 9B does not appear to be the preferred alignment here which is very welcome due to the disruption that this would cause to the family and their neighbours. However, in the event that route 9B is selected as the route at this location then the field circled red should still not be considered for a compound or temporary working use for the following reasons: 1. The land is bordered by neighbours that include a high proportion of elderly residents who choose to live there due to the quiet and tranquil nature of that location. It is inappropriate to have a commercial or industrial use at that location 2. The field slopes away from the highway and has an unsuitable topography for the purpose proposed. 3. The field is remoted from both works / route 9C and even works / route 9B and there will be a requirement for dangerous crossing of the busy B5381 when accessing and egressing the field especially when there is a dangerous blind spot there with traffic approaching from the east. 4. The land itself is especially unsuitable for use as a temporary working area or compound due to the long-term damage that this will inevitably do to the land in terms of compaction and soil strata mixing and further drainage issues. Accordingly, please locate both works 19 compound elsewhere. Yours faithfully	Following the statutory consultation, the Onshore Cable Corridor has been refined to deselect options along the Onshore Cable Corridor and to reduce the width of the corridor. The refinement process was informed by comments received during the consultation process and by engineering design. The refined Onshore Cable Corridor now routes to the south and avoids Works Area 19 and 9B.	Yes
Mon_075_002_020623	S44	Email	Dear Sirs I would like to contribute towards the statutory consultation process on behalf of REDACT and REDACT and REDACT relating to land covered by Works 18 and circled blue on the plan below (refer to response). This land has a very difficult topography and nature which cause it to severely hold water. To counter this the land has recently benefited from a drainage scheme that has cost almost £12,000 and the drainage now works very well indeed. The installation of cables will severely interfere with this and seriously impair the land. Notwithstanding this, it is the family's view that this land is not suitable for the route of this cable because there have been approaches for other alternative leisure and commercial uses on the land that the cable routes will sterilise and prevent happening which is contrary to the landowner's wishes. Further, the land is especially unsuitable for use as a temporary working area or compound and haul road due to the long term damage that this will inevitably do to the land in terms of compaction and soil strata mixing and further drainage issues. Please locate both pipes and works 18 compound elsewhere.	The project will be working with a drainage contractor to ensure there is suitable pre and post construction drainage. The project would welcome plans of the newly installed drainage so this can be considered in designs going forward. In the event that substantiated and tangible losses are incurred as a result of the project, they will be compensated for under the compensation code upon the implementation of the DCO.	No
Mon_076_001_030623	S44	Email	Dear Sirs, I am writing on behalf of my elderly parents who reside at the above address. I can confirm that I have their consent to write to you and have copied them into this e-mail. Their home is affected by the proposed Mona Offshore Wind Project and they object in the strongest possible terms to the proposed construction work which is planned to be undertaken adjacent to their home.	The Mona Onshore Development Area has been refined to remove the optionality presented in the Preliminary Environmental Information Report, in response to comments raised during the consultation process. This is documented in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference: F1.4).	Yes





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			They understand that there are three proposed routes for the construction. Work areas 20,10D and the proposed route to the south of 10D will all have a detrimental effect upon them as home owners. If the work has to proceed, the route which incorporates work area 20 is furthest from their home and would cause lesser intrusion of the three, however they would ask that other routes or options are considered.		
Mon_076_003_030623	S44	Email	Please can you confirm whether there will be recompense for the following during the construction work: a. Disruption caused to quality of life and quiet enjoyment. b. Ill health c. Financial loss I look forward to hearing from you. Kind regards,	In the event that substantiated and tangible losses are incurred as a result of the project, they will be compensated for under the compensation code upon the implementation of the DCO.	No
Mon_077_001_020623	S44	Email	Dear Sirs , We are appointed as Agents to represent our above mentioned client whom is a Tenant of the agricultural holding known as REDACTED (forming an integral part of REDACTED farming enterprise) . Our client strongly objects to the proposal for the onshore substation ('Option 2) to be located within works area 16A (as referred to on page 37 of the attached draft DCO) and shown on Sheet 14 of the Works plans as well as the onshore cable route within works Area 15A (shown in its entirety on Sheet 13 of the Works plans-: Example RPS report template (enbw-bp-consultation.s3.eu-west- 2. amazonaws.com)) as -: 1. it will significantly reduce the farmable area (in part on a permanent basis) which is vital for grazing and forage production for our client's dairy herd. 2. our client has made significant investment both in terms of time and monetarily over ap period of 16 years in improving the productivity of the land, for instance by means of drainage infrastructure, fencing and in respect of grassland reseeding and management. 3. there is concern that a number of impressive veteran oak trees located on the land will be felled, should the development be granted. The proposal will have a considerable adverse impact on our client's agricultural business given that the opportunity to secure conveniently located parcels of appropriate quality and characteristics, required for dairy production , in the near locality are very scarce- rendering such a sizeable block irreplaceable . Yours faithfully,	There has been ongoing and regular engagement with this consultee. Engagement continues at the time of writing. Potential effects and proposed mitigation regarding impacts on best and most versatile agricultural land and farm holdings within the land use and recreation study area are considered in Volume 3, Chapter 7: Land use and recreation of the Environmental Statement. In the event that substantiated and tangible losses are incurred as a result of the project, they will be compensated for under the compensation code upon the implementation of the DCO. Impacts to veteran trees have been avoided through design refinements which have been applied post-PEIR.	No
Mon_079_004_040623	S42	Email	(3) A key consideration therefore is proportionality, of which there are two aspects. Firstly, in terms of its essential rural character, loss of its agricultural land, and the size and density of its population, the scale of proposed and existing infrastructure, and in particular the scale of the Mona proposal, is wholly out of proportion to the community in which it is being sited. Indeed it would be difficult to overstate the disproportionality of it. Secondly, and equally disproportionately, the community of Cefn Meiriadog is being made to bear the entire burden of the impact of these very major developments, where other communities remain unaffected or minimally affected by them. In summary, both aspects penalise Cefn Meiriadog in an extremely disproportionate way.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4). The project has reduced the height and scale of the onshore substation buildings, as well as micro-siting the onshore substation platform. The impact on the landscape character of the Clwydian Range and Dee Valley NL and on visual receptors using the Offa's Dyke Path within the NL have also been	



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				reduced. The impact of changes in land use, including the loss of agricultural land and impacts on access to amenity space are assessed in Volume 3, Chapter 7 Land use and recreation of the Environmental Statement (Document Reference: F3.7).	
				Photomontages of the Mona onshore substation are presented in Volume 7, Annex 6.5: Landscape figures – onshore development of the Environmental Statement.	
				The landscape mitigation measures adopted as part of the Mona Offshore Wind Project are outlined in Table 6.19 and detailed in the Design Principles Document (Document reference J3) are proposed to reduce the potential impact on the scale of the project through screening. The proposed mitigation is shown on the Illustrative Landscape and Ecology Strategy Plan (Figure A.6.4 of Appendix A). An outline LEMP (Document reference J22) accompanies this Environmental Statement.	
Mon_079_005_040623	S42	Email	(4) National Grid. The original Mona wind farm plans envisaged connection to Wylfa. Likewise the MaresConnect project was originally planned to go to Connah's Quay. Both were directed by National Grid to go to their Cefn Meiriadog ('Bodelwyddan' by their designation) substation instead. National Grid's direction is therefore clearly the deciding factor in requiring projects to connect to Cefn Meiriadog/Bodelwyddan, yet both the Mona and MaresConnect connections are conditional upon National Grid's own proposed major expansion of their substation in order to allow these (and future) schemes to be accommodated. Clearly the connections could if necessary go elsewhere and indeed it was anticipated by the projects' planners that they would do so, allowing the highly disproportionate burden currently falling entirely on the single small community of Cefn Meiriadog to be distributed more evenly and proportionately. National Grid's technical decisions are ultimately based on commercial considerations, yet there has been no discussion or consultation of any kind of the implications or impacts on the community of its decisions to require Mona (and MaresConnect) to connect to Cefn Meiriadog/Bodelwyddan.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project by National Grid ESO. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No
Mon_079_006_040623	S42	Email	(5) Coordination and mitigation. It is clear that a strategic and coordinated approach to the siting of grid connection infrastructure facilities, access routes, congruence with existing built projects, substations, brownfield land where available, etc, is required if the community of Cefn Meiriadog is not to suffer from a profound change to its essential rural character and indeed, in the extreme case, to its existence given that the proposals as they stand will make it an immeasurably less attractive place to live in, to send children to school in, and to spend leisure time in. Where high-impact developments are unavoidable, mitigations such as additional landscaping, partial lowering/burial of substations, tree screening and proper use of the project temporary works budget to create haul roads independent of local village roads for the construction period should be considered. A strategic and coordinated approach is completely lacking at present, resulting in a situation in which Cefn Meiriadog's future is determined by National Grid on purely technical and/or commercial considerations, and by the commercial interests of extremely large projects such as Mona without regard to other major developments taking place in the same extremely small area. There needs be developed locally an initiative similar to those currently active in East Anglia to force a more strategic, coordinated and balanced approach which takes into account the needs of the community actually affected.	(HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No





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				The Mona Offshore Wind Project has committed to the use of haul roads that will be independent of local village roads for the construction period. Assessment of potential impacts on the local roads is included within Volume 3, Chapter 8: Traffic and Transport of the Environmental Statement (Document Reference: F3.8).	
Mon_082_001_020623	S44	Email	Offshore wind schemes are important and we support the drive for lower carbon energy generation, however, in this particular case the onshore element is simply too big, of a scale that is completely out of proportion and will have huge detrimental permanent impact on the small rural community of Cefn Meiriadog.	Since PEIR, the project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform to reduce impacts to Cefn Meiriadog. Please refer to Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement for the site selection process associated with the selection of the final onshore substation location for the purposes of the DCO application.	Yes
Mon_082_002_020623	S44	Email		Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project by National Grid ESO. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No
Mon_082_003_020623	S44	Email	There is a better way, one which would be more economical to you as the developer, be more environmentally friendly and carry less community impact both here in North Wales and Lancashire, by adopting an offshore grid system for Mona and Morgan (and indeed Morecambe), linking to a brownfield site either in North Wales or England. Although you have said the connection site is the decision of NGESO, this is not strictly correct, given that NGESO GB Connections Process and Solutions Team Networks highlight that customers are able to specify the desired connection point on their application and that following system studies and conversations with the TO may choose to change the connection site. This should be explored as a matter of urgency. Our particular circumstances mean that if onshore substation option 2 is chosen, and whichever cable route option, we will be, absolutely and squarely in the centre of major construction works and directly adjacent to an enormous electrical substation once built.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project by National Grid ESO. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No
Mon_082_013_020623	S44	Email	We understand that by the letter of the law we may not have as many rights as other affected parties, however, given the proximity of our residential property to the onshore substation option 2, (should it be chosen), for the reasons above and the belief that even during operation you will not be able to adequately mitigate and shield us from disruption, that our property, our way of life and wellbeing will be irreparably damaged. We therefore request you adhere to your (BP) code of conduct, putting yourselves in our shoes, consider this ethically	The Applicant notes your response. The Mona Offshore Wind Project will continue to work with statutory stakeholders to produce an appropriate mitigation strategy for the onshore substation. The design of the substation is outlined in the Design Principles Document (Document reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline LEMP (Document J22).	No



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			and do the right thing, which sadly for us would be the compulsory purchase of our property.	The residential property is not included in the order limits as it is not required for the delivery of the project. In the event that substantiated and tangible losses are incurred as a result of the project, they will be compensated for under the compensation code upon the implementation of the DCO.	
Mon_084_001_010623	S44	Email	Dear Sirs , We are appointed as Agents to represent our above mentioned client whom farms land at REDACTED. Our client strongly objects to the proposal for the onshore substation ('Option 7') to be located within works area 17 (as referred to on page 38 of the attached draft DCO and shown on Sheet 18 of the Works plans-: Example RPS report template (enbw-bp-consultation.s3.eu-west-2.amazonaws.com)) as it will -: 1. leave REDACTED homestead without access via the principal driveway (as the entrance off REDACTED road is no longer considered safe to use) 2. significantly reduce the farmable area which is vital for grazing and forage production for our client's dairy herd. 3. result in the slurry compound not being available which is salient for the storage of organic manure for nutrient distribution on the agricultural unit to promote pasture production . Significant investment has been made to the subject land ,over many years, to enhance its productive capacity and the loss of the agricultural parcel will have a considerable adverse impact on our clients farming enterprise (with the opportunity to secure conveniently located parcels of appropriate quality and characteristics ,required for dairy production , in the near locality being very scarce, rendering such a sizeable block irreplaceable).	The Mona Onshore Development Area has been refined following the Preliminary Environmental Information Report (as documented in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement). Option 7 has been removed from the Mona Onshore Development Area and will no longer be impacted by the Mona Offshore Wind Farm.	Yes
Mon_085_005_040623	S47	Email	5. No evidence of a strategic approach allowing for consideration as a whole of all the pending projects. Coordinating their development taking into account social and other costs to society and to specific communities, rather than solely the commercial interests of the developers involved, should be essential in any developed, democratic society.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project by National Grid ESO (NGESO). Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No
Mon_085_006_040623	S47	Email	6. Mona's consultation taken on its own lacks credibility in a situation where National Grid has undertaken no consultation of its own regarding its decisions to direct projects such as Mona to its 'Bodelwyddan' substation in Cefn Meiriadog and on that basis to propose to extend that substation. Given such a situation Mona is complicit in allowing National Grid to evade any accountability for its role in and responsibility for causing irreversible changes to the landscape, nature and character of the community of Cefn Meiriadog.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project by National Grid ESO. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No
Mon 099 049 040622	\$42	Email	Event Cable Carridge and Cabling	for its planned extension of the existing Bodelwyddan Substation, where further information on the need for the extension project should be provided.	No
Mon_088_018_040623	S42	Email	Export Cable Corridor and Cabling WTW advocates for a risk aware, as opposed to risk averse, approach to Export Cable Corridor (ECC) route planning, with the needs of the project shouldering	The Applicant notes the response. The site selection process, set out in the Volume 1, Chapter 4 Site selection and consideration of alternatives of the	No



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			the greater apportion of risk. It is accepted that a cost-benefit analysis approach to this may be the preferred strategy of the developer. However, this approach may not support the global intent of a paradigm shift in energy generation and supply that the Marine Renewable Energy (MRE) industry presents to meet climate change and energy security objectives, and take steps to enhance the marine environment.	Environmental Statement followed best practise approaches to the selection of all infrastructure locations.	
Mon_088_019_040623	S42	Email	WTW accepts that the use of the Douglas to Point y Ayr pipeline route for the ECC presents challenges to the developer. The planned cable corridor greatly exaggerates the spatial needs of the export cable, which as portrayed in the PEIR could be up to 1.5km in width running for 90km, and possibly wider at the entrance to the Array Area; the area of concern and planning dispute for the WTW is the landfall approach and as such this required increase in the approach to the Array is of a lesser concern at this time.	The Mona Offshore Cable Corridor was defined as being up to 1.5 km wide on the basis of a defined separation distance of 200 m between up to four export cables required to ensure sufficient separation distance between the cables to avoid the risk of damage or sterilisation to neighbouring cables during installation and to mitigate the risk of damage or sterilisation of neighbouring cables during maintenance or repair operations. The width of the Mona Offshore Cable Corridor also reflects the need to maintain cable routing flexibility against changes in site conditions and, or the identification of previously unrecorded constraints such as marine archaeology. It is likely that once installed, the export cables will not occupy the entire width of the Mona Offshore Cable Corridor for its entire length. The additional width of the Mona Offshore Cable Corridor where it meets the Mona Array Area reflects that the final location of offshore substation platforms is not known at this stage. Following statutory consultation on the PEIR, the Applicant has committed to installing export cables under the intertidal zone by trenchless techniques.	Yes
Mon_088_020_040623	S42	Email	TCE evidence-based study suggest that 275kv export cable requires a separation distance of 25-50m between cables to accommodate installation machinery. At MDS, and including a dredging restriction zone, a more realistic export corridor of ~650m, which meets the requirements of Security and Quality of Supply Standard (SQSS), should be planned for and ECC routes considered accordingly.	The MDS for export cable separation assumes up to 200 m between cables. The width of the Mona Offshore Cable Corridor also reflects the need to maintain cable routing flexibility against changes in site conditions and, or the identification of previously unrecorded constraints such as marine archaeology or unexploded ordnance. It is likely that once installed, export cables will not occupy the entire width of the Mona Offshore Cable Corridor for its entire length.	No
Mon_088_021_040623	S42	Email	The Douglas to Point y Ayr pipeline route passes between Gwynt y Mor OWF East and West. The distance between the East and West sites is ≥ 1km, and < 1.5km. The diameter of the gas pipe is ~0.5m. The WTW, therefore, disputes the assessment by the developer that the pipeline is taking up all available space, and strongly recommends that this route justifies further consideration.	Whilst the width of the corridor between the east and west components of Gwyn y Mor is between 1 to 1.5 km in width, there is only approximately 0.5 to 0.65 km between the closest wind turbines and the pipeline, which is a significant constraint on installing up to four export cables whilst maintaining sufficient space for maintenance of the Gwynt y Mor wind turbines and inter-array cables, the pipeline and the export cables for Mona Offshore Wind Project.	
Mon_088_022_040623	S42	Email	WTW accepts that cable spacing forms part of the broader cable protection strategy but in this instance advocates that the developer considers ECC routes which do not encourage OWF development sprawl. Incorporating advances in cable installation and maintenance, such as remote and autonomous underwater vehicles and integrity monitoring systems, into planning can enable this. The opportunity to adopt innovative solutions in ECC route selection as opposed to routes of least resistance when embraced by the developer will demonstrate a commitment to sustainability over CAPEX considerations.	Volume 1, Chapter 4, Site selection and consideration of alternatives of the Environmental Statement explains how the Applicant has sought to take a technically and practically feasible direct offshore route to the point of interconnection identified by National Grid. The Applicant has explained how the route has been refined to address feedback received in response to the PEIR.	Yes
Mon_088_023_040623	S42	Email	Exploitation of areas of the seabed which have been industrialised should be prioritized. This area of the Liverpool Bay and North East Irish Sea could be considered for Strategic Resource Area (SRA) designation. This may provide greater freedom of movement within the SRA to developers whilst ensuring neighbouring designated sites remain protected.	Volume 1, Chapter 4, Site selection and consideration of alternatives of the Environmental Statement explains how the Applicant has sought to take a technically and practically feasible direct offshore route to the point of interconnection identified by National Grid. The Applicant has explained how the route has been refined to address feedback received in response to the PEIR.	Yes
Mon_088_030_040623	S42	Email	As previously stated, it is more difficult to enhance a degraded environment than it is to adopt, from the outset, an agile project management approach that minimizes the invasive nature of the project at all costs. This practice would be a clear demonstration by Mona OWF to be embracing the paradigm shift offered	Volume 1, Chapter 4, Site selection and consideration of alternatives of the Environmental Statement explains how the Applicant has sought to take a technically and practically feasible direct offshore route to the point of interconnection identified by National Grid. The Applicant has explained how the route has been refined to address feedback received in response to the PEIR.	Yes





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			by MRE generation; placing the needs of the environment before the needs of the project.		
Mon_108_003_010623	S44	Feedback form	Q7 (For our application we will be reducing to a single onshore substation zone. Do you have any comments, feedback or preference regarding the onshore substation zones proposed for the Mona Offshore Wind Project and which one should be taken forward)- NOT OPTION 7	Noted. The Applicant announced in August 2023 option two had been chosen to take forward into its application for Development Consent. Option seven has been deselected.	Yes
Mon_108_004_010623	S44	Feedback form	Q9 (Do you have any other comments / feedback on the project, including any other information provided as a part of this consultation) - see attached letter	Content of the letter included in responses Mon_108_004_010623 to Mon_108_012_010623.	No
Mon_108_004_010623	S44	Feedback form	OTHER - We OBJECT to OPTION 7 for the following reasons:- 1. The North Wales Pilgrim's Way – The Welsh Camino is on the Cefn Road and option 7 will be in fields adjacent. Website: pilgrims-way-north-wales.org OR britishpilgrimage.org	Onshore Substation Option 7 has been discounted following the statutory consultation. Recreational resources, including Public Rights of Way located within the land use and recreation study area are identified in Volume 7, Annex 7.1: Published recreational resources technical report of the Environmental Statement. Measures adopted as part of the Mona Offshore Wind Project to mitigate impacts on recreational resources, including Public Rights of Way, National Trails, and other rights of access within the land use and recreation study area are considered in Volume 3, Chapter 7: Land use and recreation of the Environmental Statement. This includes the implementation of measures set out in the Outline Public Rights of Way Management Strategy (document reference J.27). The likely significant effects of the Mona Offshore Wind Project on recreational resources, including Public Rights of Way within the land use and recreation study area are considered Volume 3, Chapter 7: Land use and recreation of the Environmental Statement.	Yes
Mon_108_005_010623	S44	Feedback form	2. It will be too close to residential properties on Glascoed Road, we can see across to the area and even with screening we feel it would be seen.	The effects on landscape character, visual effects and cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline LEMP (Document J22).	No
Mon_108_007_010623	S44	Feedback form	4. Why bring cables down on your purpose built 'highways' to Cefn Road (option 7) and then back again to the National Grid site by Option 2?? Waste of time. Monies and less damage to environment and surely quicker for you to complete.	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference: F1.4).	Yes
Mon_108_008_010623	S44	Feedback form	5. The roads around Option 7 are single track roads and the junction from St Asaph onto the Cefn Meiriadog road is very tight. Glascoed Road (B5381) is a Roman road and should be left as such without causing unnecessary damage and continual heavy tragic usage.	The movement of construction traffic and measures to minimise the impacts are set out in the Outline Construction Traffic Management Plan (Document Reference J26.13). The detailed CTMP will be agreed with the Highways Authorities prior to construction.	No
Mon_108_009_010623	S44	Feedback form	6. Option 2 has less residential properties and has a much better road to link to the A55 and through the St Asaph Business Park.	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference: F1.4).	Yes
Mon_108_010_010623	S44	Feedback form	7. I am aware and have searched the internet regarding property prices near small substations and in general the properties have lost up to 38% of their value. With this in mind, I would expect as a matter of goodwill from EnBW compensation of more than that as it's not a small substation, if Option 7 is chosen.	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference: F1.4).	Yes





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Mon_108_012_010623	S44	Feedback form	9. If Option 7 were to go ahead, and I sincerely hope it doesn't, I would expect the company to pay for landscaping in my garden so I don't see the atrocities (transformers 20mtrs high) from my back garden. We have worked hard all our lives to purchase our home and bought it because of the surrounding countryside behind and beyond only for you to consider taking it away from us and our children's inheritance. Please, please choose Option 2 and make us very happy retirees. Option 2 has fewer residential properties and would be cheaper for you and less impact on the environment as it is nearer to the existing substation, your 'highways' are already in place and its closer to the National Grid connection.	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference: F1.4).	Yes
Mon_115_004_000623	S44	Email	5. There is a total imbalance in the size and scale of these developments and the size and scale of the land and homesteads in Cefn. We have already suffered irrevocable environmental and visual harm from previous developments but the proposed 31 acre Mona Offshore Substation with its additional infrastructure are of huge proportions. In addition, and working within the same time frame, we will also have a A 13 acre substation for Awel y Mor Onshore Windfarm. b. A 103 x 80 metre extension to the National Grid Substation. c A 15 acre Conversion Station for the Mares Connect project linking the UK and Irish electricity grids. d An 80 acre Solar Farm.	The onshore EIA and cumulative effects assessment is presented in relevant topic chapters within Volume 3 of the Environmental Statement. The projects, plans and activities considered for the cumulative effects assessment are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement (Document Reference 5.5.1).	No
Mon_115_006_000623	S44	Email	Cefn Meiriadog is a rural environment of very substantial archaeological and historical importance. 'The Bryn', the limestone ridge which forms the backbone of Cefn and is fundamental to its character and identity with exceptional views looking north, will be looking down at the 31 acre industrial Mona substation and its other transmission structures constructed outside the site fence. Its physical presence will dominate the landscape, a hugely insensitive reminder of the agricultural heritage and valued place that it once was.	The landscape and visual impact assessment on Cefn Meiriadog is presented in Volume 3, Chapter 6: Landscape and Visual Resources of the Environmental Statement (Document Reference F3.6). The assessment on the historic environment at Cefn Meiriadog is presented in Volume 3, Chapter 5: Historic Environment of the Environmental Statement (Document Reference: F3.5).	No
Mon_115_007_000623	S44	Email	6.The current National Grid Substation cannot take the demand and will have to be increased substantially in size. Mona was originally planned to be connected to Wylfa and MaresConnect to Connah's Quay but both have been switched to Cefn Meiriadog on the instruction of National Grid, i.e. the Bodelwyddan Substation. That there will be more development proposals is made clear by National Grid's statement that, referring to the Awel y Môr project which preceded Mona, the 'Bodelwyddan Upgrade' "is critical infrastructure to enable the connection of multiple projects at this location, with this being only one of a number of projects requiring a future connection to the Bodelwyddan Substation". NB National Grid refer to the substation in Cefn as 'the Bodelwyddan Substation' and its extension as the 'Bodelwyddan Upgrade'. It seems that once here, it becomes an easy justification for expansion. It is as if Cefn Meiriadog has become a dumping ground for all these developments when there are clearly alternative sites, including brown field sites, that need to share the load.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project by National Grid. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No
Mon_002_003_080623	S42/S44	Email	With respect to the proposed onshore substation, whilst the Council recognises the need to connect to the National Grid sub-station, it feels that a further large sub-station in this semi-rural part of the County will fundamentally alter the character of the area to the further detriment of its economic, social and environmental well-being. The cumulative impacts of both the extensive construction works within the County alongside another very large building on a green field site, close to other similar structures, would have an unacceptable impact on nearby communities.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				The effects on landscape character, visual effects and cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline LEMP (Document J22). The impacts to the local economy are assessed in Volume 4, Chapter 3 Socio-	
Mon_002_018_080623	S42/S44	Email	Substation – The Council raises strong concerns about both of the substation location options (2 and 7). These sites are current green field outside any development boundary and could accommodate a main building with maximum parameters of 20m height and 140m length. Such buildings will be extremely difficult to screen and concerns are raised about the potential negative visual and neighbour impacts. As already mentioned in the general comments section, when examined in the context of other substantial substation development in the locality (National Grid, Burbo Bank, Gwynt Y Môr, Awel Y Mor (pending), Scottish Power and overhead pylons/electricity lines) the cumulative impacts on the villages of Bodelwyddan, Cefn Meiriadog and the City of St. Asaph have been underplayed in the PEIR. The potential impacts of the construction phases of the cabling and substation would be significant with the potential for major disruption to the aforementioned villages and City. Whilst landscape and ecological impacts have been highlighted and noted in various chapters, (with mitigation measures suggested) the Council maintains that the localised impacts of the substation will have longer term negative impacts on wider landscape views and biodiversity.	economics of the Environmental Statement. Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4). The project has reduced the height and scale of the onshore substation buildings, as well as micro-siting the onshore substation platform. The impact on the landscape character and on visual receptors has been reduced. Photomontages of the Mona onshore substation are presented in Volume 7, Annex 6.5: Landscape figures – onshore development of the Environmental Statement. The landscape mitigation measures adopted as part of the Mona Offshore Wind Project are outlined in Table 6.19 and detailed in the Design Principles Document (Document reference J3) are proposed to reduce the potential impact on the scale of the project through screening. The Illustrative Landscape and Ecology Strategy Plan (Figure A.6.4 of Appendix A) has been designed to retain and enhance habitats where possible and improve ecological connectivity to the wider landscape, in tandem with creating a landscape strategy that screens the onshore substation. An outline LEMP (Document reference J22) accompanies this Environmental Statement. The onshore EIA and cumulative effects assessment is presented in relevant topic chapters within Volume 3 of the Environmental Statement. The projects, plans and activities considered for the cumulative effects assessment are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Envi	
Mon_002_036_080623	S42/S44	Email	Consideration should be given to the proximity of the Denbighshire Memorial Park and Crematorium. Disruption to the peaceful and tranquil setting will be felt both during construction work and when any building is constructed. Cumulative impacts should also be examined further given the potential for this business to be flanked by substations.	Consideration has been given to the proximity of sensitive receptors (e.g. Denbighshire Memorial Park and Crematorium) in the site selection process detailed in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives. The refinement of the Onshore Cable Corridor and the access strategy for the Onshore Substation have reduced the potential for disturbance.	No
Mon_117_001_120623	S44	Feedback form	We act as agents for and behalf of REDACTED, who own the land where the applicant has sought to locate the main substation for the project. The proposed locations site '2' or '7' would have a profound detrimental impact to Cefn, the local community and it's occupiers. Site 2 -in-particular, which we consider will be the applicant's preferred site, poses considerable blight and negative impact. We are concerned that the applicant has not been transparent in assessing alternative options (of the 7 initially reviewed- 5 were proposed to be located on Cefn). It is clear that the interest lies in being as close to the National Grid	The Applicant notes your response. Full details of the onshore substation site selection process can be found in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives in the Environmental Statement (Document Reference: F1.4). The onshore EIA and cumulative effects assessment is presented in relevant topic chapters within Volume 3 of the Environmental Statement. The projects,	No





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			Substation and endeavouring to deal with as few landowners as possible. We would have welcomed a similar approach applied by the RWE Awel y Môr scheme, which considered a wider approach- at the same time acknowledging the congestion at Cefn and the cumulative impact of the natural environment (Cefn already sites two substations, and the National Grid substation - which is seeking a further extension, also). The REDACTED opposes the onshore element, specifically the proposed sub-station locations of the applicant. Arguments will be formalised as the application progresses.	plans and activities considered for the cumulative effects assessment are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement (Document Reference F5.5.1). In respect of blight, certain property owners may be able to serve a 'blight notice' upon the acquiring authority to purchase their interest in the blighted land if certain qualifying criteria can be satisfied. If the blight notice is successful, the amount of compensation payable is governed by the National Compensation Code.	
Mon_118_001_090623	S44	Email	It has only come to our attention recently the proposed MONA route and how that interacts with the land ownership of REDACTED, we are their Land Agents in this matter. We had a meeting on site, as REDACTED own the land adjacent to the Bodelwyddan substation, which will be directly affected by both the proposed MONA scheme and two other cable schemes and a battery storage facility on the land which is adjacent to the substation. I enclose a plan of the proposed MONA Substation Option 2, with REDCATED land highlighted and outlined in pink on that plan. As you can see, their land lies immediately adjacent to the proposed substation, and the work area 15A covers a large proportion of the land they own to the east. Our submission in this would be to request that the cabling for the easement route does not enter into the pink highlighted land, as that land is under Heads of Terms for battery storage to another party which has a connection right into the substation.	Part of the property in question has been included in the Onshore Development Area as it is required to facilitate the connection between the Mona Onshore Substation and the National Grid substation at Bodelwyddan. In the event that substantiated and tangible losses are incurred as a result of the project, they will be compensated for under the compensation code upon the implementation of the DCO.	No
Mon_118_002_090623	S44	Email	We are also in discussions with Awel Y Mor and have requested that their cabling affects the very northern edge of this route, and they are in agreement with that, and we hope that MONA will be able to install their easement routes to the eastern part of work area 15A, avoiding the pink highlighted land in that area. Just to reiterate this, we will be Land Agents acting on behalf of the landowners in this case and if their inability to enter into a battery storage scheme as a result of the MONA works, that will be taken into account for any compensation claim we prepare on their behalf, and I hope that you are able to work with us to avoid this area. If you would like to discuss this further, please feel free to contact us.	In the event that substantiated and tangible losses are incurred as a result of the project, they will be compensated for under the compensation code upon the implementation of the DCO.	No
Mon_120_003_150623	S44	Email	2. St Asaph has city status. We are a historic Cathedral city and the Cathedral is a pivotal point of the city. At recent consultation events, BP representatives were clear that there are concerns of the substation location regards the Cathedral, and ecological issues that the substation will present (Option 2). The scale of the substation is completely out of proportion to St Asaph and neighbouring Cefn Meiriadog (both options 2 and 7).	The landscape and visual impact assessment on St Asaph is presented in Volume 3, Chapter 6: Landscape and Visual Resources of the Environmental Statement (Document Reference F3.6). The assessment on the historic environment at St Asaph is presented in Volume 3, Chapter 5: Historic Environment of the Environmental Statement (Document Reference: F3.5)	No
Mon_120_004_150623	S44	Email	3. There is already significant existing onshore energy infrastructure close to St Asaph city, saturating this area without further additional projects: Dong Energy (now Örsted) Burbobank Extension cables and large substation RWE Gwynt y Môr cables and large substation National Grid Bodelwyddan substation actually close to boundary of St Asaph) Scottish Power distribution substation 16MW STOR gas fired backup power station (Welsh Power) 5MW STOR planning approved Mona is one of many current energy proposals affecting St Asaph/Cefn	The onshore EIA and cumulative effects assessment is presented in relevant topic chapters within Volume 3 of the Environmental Statement. The projects, plans and activities considered for the cumulative effects assessment are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement (Document Reference 5.5.1).	No





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			Meiriadog: Awel y Môr wind farm cables and very large substation (21.62 acres) St Asaph Solar Farm (80 acres) with associated substation Mares Interconnector with infrastructure (15 acre convertor substation) National Grid substation extension required to enable some of the above proposals(108 x 40 metres) Elwy Solar Farm originally refused permission and maintains connection agreement with National Grid.		
Mon_120_005_150623	S44	Email	Most (if not all) of the proposed projects have similar timescales. Therefore, the cumulative construction and operational impact of the Mona proposal taken with other existing and proposed developments here is even m ore unacceptable. There is an alarming increase in the rate of development. People have chosen to live in St Asaph due to the city being small with extremely pleasant rural aspects within short walking distance. However, for the people using the Cefn Road this will be lost forever. The current sub stations occupy the areas considered to offer better topographical screening; the current proposed substation locations for Mona (and other projects) are much more invasive to the community.	The onshore EIA and cumulative effects assessment is presented in relevant topic chapters within Volume 3 of the Environmental Statement. The projects, plans and activities considered for the cumulative effects assessment are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement (Document Reference 5.5.1).	No
Mon_120_006_150623	S44	Email	4. There is a need for a strategic and coordinated approach to t he development proposals which is not happening. Many government reports acknowledge the need for changes to avoid oversaturating communities with infrastructure and to reduce onshore infrastructure. - The National Policy Statement for Energy - The Offshore Transmission Network Review (- The Non Technical Summary Offshore Wind and Grid in Wales - The Future Wales Nation Plan 2040 There are known and recognised options described in literature to achieve these positive improvements, but it is not happening. National Grid decisions are based on commercial considerations with no discussion or consultation on community impacts of necessary changes required for National Grid to actually accommodate Mona, Mares Interconnector etc	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No
Mon_120_007_150623	S44	Email	Low carbon energy is considered essential going forward, and this is accepted. However it is vital that a strategic and coordinated approach is to happen if St Asaph is not to suffer such a profound and devastating change to its current pleasant character. The lack of coordination is resulting in a situation where our future is determined by National Grid on commercial considerations, and the commercial interests of BP, without regard to other concurrent major developments also affecting our small area.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No
				The onshore EIA and cumulative effects assessment is presented in relevant topic chapters within Volume 3 of the Environmental Statement. The projects, plans and activities considered for the cumulative effects assessment are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement (Document Reference F5.5.1).	
Mon_120_008_150623	S44	Email	5. Originally Mona was planned to connect at Wylfa. Mares was planned to connect at Connas Quay. Both have been directed to National Grid Bodelwyddan substation (at St Asaph). National Grid are therefore making decisions; yet both these projects are conditional on a National Grid substation extension to accommodate these and future schemes.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project	No





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			The grid connection for Mona COULD go elsewhere this would save the disproportionate burden on St Asaph/Cefn Meiriadog if other communities shared the overall burden.	considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	
Mon_120_010_150623	S42/S44	Email	7. Concern has to be stated following the recent Consultation events: Dalcour Maclaren indicated that sizeable agricultural areas marked on the Mona project maps as temporary lay down areas during construction, may be left as hard standing following construction if the landowner preferred.	Comments noted. If a landowner wishes to retain any temporary construction compound following completion of the works, they will be required to apply for planning permission in the normal way through their local planning authority.	No
Mon_120_011_150623	S42/S44	Email	Considering that many landowners in the local area have already been approached regarding their land being used for battery storage by companies offering very lucrative rewards, this is worrying as Mona lay down areas, currently fields may very likely become large battery storage compounds ideally situated close to National Grid substation. Again, significant loss of amenity for St Asaph and its residents.	The project will only take the land required to facilitate the project. Any development on the land following the project will be at the landowners discretion through the planning system.	No
Mon_122_005_080723	S42	Email	In relation to the onshore cable route, we note you recognise that trenching would have serious impact on the Llanddulas Limestone and Gwrych Castle Wood SSSI. The use of HDD is welcome; however, care must be taken to avoid root damage, especially in areas of shallow soil.	Trenchless techniques will be used to cross the Gwrych Castle Wood SSSI (please see Volume 5, Annex 4.3: Onshore crossing schedule of the Environmental Statement). The depth of the trenchless technique will be confirmed during detailed design and will aim to avoid any root damage.	Yes
Mon_122_006_080723	S42	Email	Though the proposed route of the landfall of the marine cable is planned to avoid the Sabellaria alveolate reef, in the vicinity of Traeth Pensarn SSSI, it is critical that adequate buffering is provided to avoid accidental or careless damage to this feature.	Trenchless techniques will be used to cross the Sabellaria alveolata reef, in the vicinity of Traeth Pensarn SSSI (please see the Outline Landfall Construction Method Statement (Document Reference J26.14)	Yes
Mon_128_003_230423	S44	Feedback form	The landfall compact zone should ensure that access to the sea and beaches for the public are not impacted	The Applicant notes your response. The Mona Offshore Wind Project has made a commitment that no above-ground works will occur through the intertidal area - therefore public access to the sea and Pensarn Beach will not be restricted. Details of the refinements made at the landfall can be found in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference: F1.4)	Yes
Mon_139_002_190523	S47	Feedback form	Terrible location for the lifeline of The Isle of Man!	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_144_001_260523	S44	Feedback form	We act as agents for and behalf of REDACTED, who own the land where the applicant has sought to locate the main substation for the project. The proposed locations site '2' or '7' would have a profound detrimental impact to Cefn, the local community and it's occupiers. Site 2 -in-particular, which we consider will be the applicant's preferred site, poses considerable blight and negative impact.	The Applicant notes your response. Full details of the onshore substation site selection process can be found in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives in the Environmental Statement (Document Reference: F1.4).	No





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			We are concerned that the applicant has not been transparent in assessing alternative options (of the 7 initially reviewed- 5 were proposed to be located on Cefn) It is clear that the interest lies in being as close to the National Grid Substation and endeavouring to deal with as few landowners as possible. We would have welcomed a similar approach applied by the RWE Awel y Môr scheme, which considered a wider approach- at the same time acknowledging the congestion at Cefn and the cumulative impact of the natural environment (Cefn already sites two substations, and the National Grid substation - which is seeking a further extension, also). The REDACTED opposes the onshore element, specifically the proposed sub-station locations of the applicant. Arguments will be formalised as the application progresses.	The onshore EIA and cumulative effects assessment is presented in relevant topic chapters within Volume 3 of the Environmental Statement. The projects, plans and activities considered for the cumulative effects assessment are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement (Document Reference F5.5.1). In respect of blight, certain property owners may be able to serve a 'blight notice' upon the acquiring authority to purchase their interest in the blighted land if certain qualifying criteria can be satisfied. If the blight notice is successful, the amount of compensation payable is governed by the National Compensation Code.	
Mon_146_005_260523	S47	Feedback form	Our water supply is adjacent to your proposed route. It supplies all our water for 2 households and 7 fields.	The Onshore Cable Corridor has been refined following the statutory consultation: options along the corridor have been deselected and the width of the corridor has been reduced. Alongside this refinement, an assessment of the potential impacts on private groundwater supplies as a result of the Mona Offshore Wind Project has been included in Volume 7, Annex 1.2: Groundwater sources of supply - hydrogeological risk assessment of the Environmental Statement. Where impacts are may occur, appropriate mitigation measures have been identified.	No
Mon_147_001_260523	S44	Feedback form	Our property backs on to the North Route. We have a holiday home business that backs on to the forest in the Route. Also there are a number of houses right along the route at this point. The South Route has very little housing at these points so is a preferred route from our position and a far easier route as there is no ancient forests to go under. South Route far less intrusive.	Following the statutory consultation, the Onshore Cable Corridor has been refined to deselect options along the Onshore Cable Corridor and to reduce the width of the corridor. The refinement process was informed by comments received during the consultation process and by engineering design. The refined Onshore Cable Corridor has selected the southern route at this location. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference: F1.4) for full details of the onshore cable corridor refinements.	Yes
Mon_148_001_260523	S44	Feedback form	Am unhappy about the position of the substation, my property will overlook this project, the position is right behind my property.	The Applicant notes your response. Full details of the onshore substation site selection process can be found in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives in the Environmental Statement (Document Reference: F1.4).	No
Mon_148_005_260523	S44	Feedback form	Would prefer option 2.	Noted. The Applicant announced in August 2023 option two had been chosen to take forward into its application for Development Consent. Option seven has been deselected.	No
Mon_158_005_020623	S44	Feedback form	Why the excessive infrastructure in Cefn Meiriadog? National Grid seem to be the key decider in the equation. The Mona project was originally proposed to connect at Wylfa, but NG have decided otherwise and have now favoured their 'Bodelwyddan' substation in Cefn Meiriadog, which also needs upgrading to accommodate the proposals. Cefn Meiriadog is an historic community, which is now truly fighting to remain in existence let alone keep its community identity. Is this the way we wish to behave? Riding roughshod over people (not receptors!), destroying lives, communities, farming, peoples' wellbeing without care?	The applicant thanks the consultee for their comments and recognises the importance of the queries raised. The Applicant is a responsible developer committed to operating as part of the North Wales community for many decades to come. Throughout this period we are committed to working in partnership with the local community to ensure any impacts created by the Project are identified and appropriately mitigated. The Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	





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Mon_158_013_020623	S44	Feedback form	Cefn Meiriadog residents unhappy at the current proposed developments are not NIMBY's, we have a large amount of infrastructure already which has and does affect some residents negatively, but what is wrong is oversaturating a small rural area to breaking point. It is easy to not look at residents as real people by calling us 'receptors', and using such terms in Impact Scoring as 'minor adverse' etc; the reality will be very different for people of Cefn Meiriadog along the onshore route.	The Applicant is committed to operating as part of the North Wales community for many decades to come, by working in partnership with the local community to ensure any impacts created by the Project are identified and appropriately mitigated. The Environment Impact Assessment (EIA) has been undertaken using a standard methodology as prescribed in The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, using industry standard terminology. The onshore EIA and cumulative effects assessment is presented in relevant topic chapters within Volume 3 of the Environmental Statement. The projects, plans and activities considered for the cumulative effects assessment are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement (Document Reference 5.5.1).	No
Mon_158_014_020623	S44	Feedback form	Grade II Listed Buildings should not be situated within onshore cable corridor boundaries.	The Applicant notes your response. Following the statutory consultation, the Onshore Cable Corridor has been refined to deselect options along the Onshore Cable Corridor and to reduce the width of the corridor. The refinement process was informed by comments received during the consultation process and by engineering design. This has removed any Grade II Listed Buildings from the onshore cable corridor boundary. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference: F1.4) for full details of the onshore cable corridor refinements.	Yes
Mon_160_016_020623	S47	Feedback form	This proposal clearly shows that when it was dreamt up, there was no consideration given to existing sea farers - but then, this is not London so what does it matter. You have much work to do.	The proposals for the Mona Offshore Wind Project have been developed using a iterative design process with changes being made as more information from surveys and stakeholder engagement became available. Details of how the Mona Offshore Wind Project developed are included in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference: F1.4).	No
Mon_161_001_020623	S47	Feedback form	St Asaph Business Park has been classed as dangerous health and safety risk for staff and delicate electronic equipment by the business community, due to the existing electric stations and cables that surround the business park. Your substation and cables will only kill off St. Asaph Business Park as new business have been warned to avoid St. Asaph Business Park. You have printed on one maps of cables and substations the parish of LLannefydd when it is in the Cefn Meiriadog Parish. This is an obvious tactic to confuse local residents. National Grid have confused local residents and St. Asaph Business Park in naming their Substation as Bodelwyddan Substation, when it is in The St Asaph Business Park and in the Parish of Cefn Meiriadog.	The Applicant notes your response and would like to highlight the following chapters for further information: Impacts to health have been assessed in Volume 4, Chapter 4: Human Health Assessment of the Environmental Statement (Document Reference: F4.4). Impacts to local businesses have been assessed in Volume 4, Chapter 3: Socio-economics of the Environmental Statement (Document Reference: F4.3). Also, to note, the applicant has used standard OS maps when producing maps, and with regard the naming of the substation Bodelwyddan, this was done by National Grid.	No
Mon_162_002_040623	S47	Feedback form	Any disruption/construction work is likely to be temporary, Project could bring employment into local area. Existing infrastructure for Wylfa A and B could be used.	The Applicant notes your response.	No
Mon_162_004_040623	S47	Feedback form	Anglesey is well served by infrastructure to support this project. One main advantage is that power will produced close to centres of large population ie Liverpool andf Manchester	The Applicant notes your response.	No
Mon_164_001_040623	S44	Feedback form	I believe the construction of this project should make a greater effort to bring the power line ashore much closer to the Bodelwyddan site of the transformer construction, or better yet connect to existing power lines bring power ashore from existing wind farms in this area.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project	No





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				was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	
				The location of the landfall is the primary driver for the length and route of the onshore cable corridor. Details of the site selection process to identify the landfall location can be found in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference: F1.4)	
Mon_164_002_040623	S44	Feedback form	I am strongly opposed to the long and highly destructive path of the power cables to the transformer station. Existing power connections from offshore wind farms should be exploited to address this, or at the very least the 18 km proposed paths of the power line should be shortened by bring the power ashore much closer to the site at Bodelwyddan.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No
				The location of the landfall is the primary driver for the length and route of the onshore cable corridor. Details of the site selection process to identify the landfall location can be found in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference: F1.4)	
Mon_164_003_040623	S44	Feedback form	You could do much more to limit the length of the onshore power connection and thereby mitigate the many negative aspects of this project.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No
				The location of the landfall is the primary driver for the length and route of the onshore cable corridor. Existing infrastructure such as railways, roads, ports, recreational areas and built-up areas were considered in identifying an initial search area. The initial search area encompassed the North Wales coast for the landfall. Following further onshore cable routeing work, site walkover, input from electrical design and construction specialists, and consultation with stakeholders via the EIA Evidence Plan Process, individual areas of search were identified for the offshore Mona Offshore Cable Corridor landfall. The preferred option for offshore routeing would minimise interaction with the Constable Bank feature and route to the south from Mona Array Area, travelling to the west of the existing Gwynt y Môr and proposed Awel y Môr windfarms and make landfall at one of two potential landfall locations on Pensarn Beach. Full details of the site selection process to identify the landfall location can be found in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference: F1.4)	
				The combination of the location of these two infrastructure considerations (i.e. the point of interconnection and the location of the landfall, driven by offshore	





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				cable routing requirements and feasibility) have defined the length of the onshore cable route.	
Mon_164_004_040623	S44	Feedback form	It is profoundly disappointing that you have chosen a landfall site that will mean an 18 km path across countryside that is of outstanding beauty, and vital for the livelihood of local farmers.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No
				The location of the landfall is the primary driver for the length and route of the onshore cable corridor. Existing infrastructure such as railways, roads, ports, recreational areas and built-up areas were considered in identifying an initial search area. The initial search area encompassed the North Wales coast for the landfall. Following further onshore cable routeing work, site walkover, input from electrical design and construction specialists, and consultation with stakeholders via the EIA Evidence Plan process, individual areas of search were identified for the offshore Mona Offshore Cable Corridor landfall. The preferred option for offshore routeing would minimise interaction with the Constable Bank feature and route to the south from Mona Array Area, travelling to the west of the existing Gwynt y Môr and proposed Awel y Môr windfarms and make landfall at one of two potential landfall locations on Pensarn Beach. Full details of the site selection process to identify the landfall location can be found in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference: F1.4)	
				The combination of the location of these two infrastructure considerations (i.e. the point of interconnection and the location of the landfall, driven by offshore cable routing requirements and feasibility) have defined the length of the onshore cable route.	
Mon_164_005_040623	S44	Feedback form	As I have stated earlier, utilise existing connections to wind farms offshore, the reason you are not doing so is purely because you want to be independent from those other companies. You need to connect at the shore to the same resources.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No
				The location of the landfall is the primary driver for the length and route of the onshore cable corridor. Existing infrastructure such as railways, roads, ports, recreational areas and built-up areas were considered in identifying an initial search area. The initial search area encompassed the North Wales coast for the landfall. Following further onshore cable routeing work, site walkover, input from electrical design and construction specialists, and consultation with stakeholders via the EIA Evidence Plan process, individual areas of search were identified for the offshore Mona Offshore Cable Corridor landfall. The preferred option for offshore routeing would minimise interaction with the Constable Bank feature and route to the south from Mona Array Area, travelling to the west of the existing Gwynt y Mor and proposed Awel y Mor windfarms and make landfall at one of two potential landfall locations on Pensarn Beach. Full details of the site selection process to identify the landfall location can be found in Volume 1,	





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				Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference: F1.4).	
				The combination of the location of these two infrastructure considerations (i.e. the point of interconnection and the location of the landfall, driven by offshore cable routing requirements and feasibility) have defined the length of the onshore cable route.	
Mon_164_006_040623	S44	Feedback form	Several nearby neighbours of mine rely on wells, which draw from aquifers in the path of the onshore power line route - this is likely to negative influence their water supply.	The Onshore Cable Corridor has been refined following the statutory consultation: options along the corridor have been deselected and the width of the corridor has been reduced. Alongside this refinement, an assessment of the potential impacts on private groundwater supplies as a result of the Mona Offshore Wind Project has been included in Volume 7, Annex 1.2: Groundwater sources of supply - hydrogeological risk assessment of the Environmental Statement. Where impacts may occur, appropriate mitigation measures have been identified.	Yes
Mon_183_007_110523	S47	Consult Online	Ground conditions were hard at Gwynt Y Môr, some monopiles didn't make depth due to ground conditions, careful site investigation needs to be undertaken at each potential piling site.	Noted. Extensive ground surveys will be carried out at each piling location. Following the PEIR, the monopile foundation option has been removed and gravity base foundations and jacket foundations on pin-piles or suction buckets retained. Further information on the foundation options is presented in Volume 1, Chapter 3: Project description of the Environmental Statement (document reference F1.3).	No
Mon_184_001_150523	S47	Consult Online	Please can you respond to the facts that the scheme looks to be going through a pre registered area of a town and village green application under the Wales 2006 sn 15 act from December 2021 which is under consideration by the registration body of Conwy county council. The area applied for registration embodies the woods and outlying areas, please contact REDACTED or REDACTED. There are also multiple applications for Public rights of way also through the area indicated by your map, please let me know if the Gwrych castle trustees have not informed you of these legal applications that were lodged in April and December 2021 Regards Cllr Andrew Wood ward member for the planned area	The application for Town and Village Green status was known at the time of site selection. The onshore cable corridor is proposed to use trenchless techniques to pass beneath the Gwrych Castle woodland so there is no proposed	Yes
Mon_190_003_020623	S47	Email	in short / long term de, value the statics and the sitethe owner wants to stress his clear objections to it been directly behind and on full view from the owners statics	Noted and received.	No
Mon_196_001_010623	S44	FREEPOST	The North Wales Pilgrim's Way – The Welsh Camino is on the Cefn Road and option 7 will be in fields adjacent. Website: pilgrims-way-north-wales.org OR britishpilgrimage.org	Onshore Substation Option 7 has been discounted following the statutory consultation. Recreational resources, including Public Rights of Way located within the land use and recreation study area are identified in Volume 7, Annex 7.1: Published recreational resources technical report of the Environmental Statement. Measures adopted as part of the Mona Offshore Wind Project to mitigate impacts on recreational resources, including Public Rights of Way, National Trails, and other rights of access within the land use and recreation study area are considered in Volume 3, Chapter 7: Land use and recreation of the Environmental Statement. This includes the implementation of measures set out in the Outline Public Rights of Way Management Strategy (document reference J.27). The likely significant effects of the Mona Offshore Wind Project on recreational resources, including Public Rights of Way within the land use and recreation study area are considered Volume 3, Chapter 7: Land use and recreation of the Environmental Statement.	Yes
Mon_196_002_010623	S44	FREEPOST	It will be too close to residential properties on Glascoed Road, we can see across to the area and even with screening we feel it would be seen.	The landscape and visual impact assessment on St Asaph is presented in Volume 3, Chapter 6: Landscape and Visual Resources of the Environmental Statement (Document Reference F3.6). An Illustrative Landscape and Ecology	No





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				Strategy has been prepared and is included in the Outline LEMP (Document J22).	
Mon_196_003_010623	S44	FREEPOST	The decimation of the countryside will be catastrophic; fields, trees, hedgerows and major disruption to wildlife habitats.	A full assessment of impacts on onshore ecology is assessed in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement alongside details of the proposed mitigation measures that will be implemented to reduce the impacts.	No
Mon_196_004_010623	S44	FREEPOST	Why bring cables down on your purpose built 'highways' to Cefn Road (option 7) and then back again to the National Grid site by Option 2?? Waste of time. Monies and less damage to environment and surely quicker for you to complete.	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference: F1.4).	Yes
Mon_196_005_010623	S44	FREEPOST	The roads around Option 7 are single track roads and the junction from St Asaph onto the Cefn Meiriadog road is very tight. Glascoed Road (B5381) is a Roman road and should be left as such without causing unnecessary damage and continual heavy tragic usage.	Onshore Substation Option 7 has been discounted from the site selection process following the S42 consultation. The decision was communicated via newsletter (and website update) in Autum 2023. The decision-making for the deselection of Onshore Substation Option 7 is explained in detail in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives.	Yes
Mon_196_006_010623	S44	FREEPOST	Option 2 has less residential properties and has a much better road to link to the A55 and through the St Asaph Business Park.	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference: F1.4).	Yes
Mon_196_007_010623	S44	FREEPOST	I am aware and have searched the internet regarding property prices near small substations and in general the properties have lost up to 38% of their value. With this in mind, I would expect as a matter of goodwill from EnBW compensation of more than that as it's not a small substation, if Option 7 is chosen.	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference: F1.4)	Yes
Mon_196_009_010623	S44	FREEPOST	If Option 7 were to go ahead, and I sincerely hope it doesn't, I would expect the company to pay for landscaping in my garden so I don't see the atrocities (transformers 20mtrs high) from my back garden. We have worked hard all our lives to purchase our home and bought it because of the surrounding countryside behind and beyond only for you to consider taking it away from us and our children's inheritance.	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference: F1.4).	Yes
Mon_196_010_010623	S44	FREEPOST	Please, please choose Option 2 and make us very happy retirees.	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference: F1.4).	Yes
Mon_196_011_010623	S44	FREEPOST	Option 2 has fewer residential properties and would be cheaper for you and less impact on the environment as it is nearer to the existing substation, your 'highways' are already in place and its closer to the National Grid connection.	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference: F1.4).	Yes
Mon_197_002_190623	S44	FREEPOST	From the tabling events, of which I attended 2 Noted above, we are now down to 2 No locations, of your choice, No 2 and 7 outside of LDP boundary. Why is there not any joined up thinking/planning and the proposed substation combined with the Awel Y Mor substation, scheduled to be built? And indicated on your information	The site selection process is described in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference: F1.4).	No
Mon_197_003_190623	S44	FREEPOST	There is also brown field site the former Pilkingtons site off Glascoed Road, part of the business park, I was told in the tabling events it would fit, but there was no	The technical considerations of the onshore substation (i.e.footprint and compound requirements) are detailed at each stage of the site selection	No





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			space for a construction compound, surely if the works are programmed thoroughly, materials/components are able to be delivered as required and on time without need for a 'large' compound area, to the rear of this site is a substation for linking to the national grid, plus the gas turbine generators are located there when the wind turbines are not generating as required, dependent on the wind conditions	process within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference: F1.4). This details that the old Pilkington Glass site does not meet the technical requirements of the Mona Offshore Wind Project onshore substation and therefore was not included for consideration.	
Mon_197_004_190623	S44	FREEPOST	As we know the Wylfa Nuclear Plant has come to the end of its life with existing infrastructure in existence to the national grid, why is the Mona Wind Farm not linked to this, a shorter route to land and less disturbance during construction, there is also the potential of the substation and associated being constructed on the former aluminium works site, another brown field site. This would avoid the current proposed inland cabling works, the associated infrastructures and buildings.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4).	No
Mon_197_007_190623	S44	FREEPOST	There are now 2 No Mona Substation sites, No 2 and No 7, not sure how the sites 1, 3, 4. 5 & 6 have got dismissed since receiving paper work September/October 2022 and May 2023.	The site selection process is described in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference: F1.4).	No
Mon_197_008_190623	S44	FREEPOST	As previous why is there not joined up thinking/planning and combining with Awel Y Môr substation, or to be more ecologically friendly and being located on the Pilkington brown field site with it link to the national grid and the gas fires power station when the wind power is not generated due to weather and wind conditions.	The technical considerations of the onshore substation (i.e. footprint and compound requirements) are detailed at each stage of the site selection process within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference: F1.4). This details that the old Pilkington Glass site does not meet the technical requirements of the Mona Offshore Wind Project onshore substation and therefore was not included for consideration.	No
Mon_197_011_190623	S44	FREEPOST	The address above is where I live, and if the Mona Substation site 7 is approved, I will be looking directly at it.	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference: F1.4).	Yes
Mon_197_012_190623	S44	FREEPOST	At the meetings I requested confirmation of its exact location, this was not provided, in particular was it in front of (North) of the first line of National Grid Pylons or the second line of National Grid Pylons, this I could not be told.	The two potential locations for the Mona onshore substation options proposed for consideration as part of the statutory consultation were shown on various maps and drawings which were available at public events and online. Both options were assessed in the PEIR, with only one of the options taken forward to the DCO application. The exact setting and footprint of the onshore substation was not known until further studies and surveys had been carried out post-PEIR. Further detail behind the selection of the preferred onshore substation is provided within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference: F1.4).	Yes
Mon_197_013_190623	S44	FREEPOST	There are other major services crossing, in order, from the rear of the above address, LV electric on poles o/h, water main u/g, first line of HV cables on pylons o/h, high pressure gas main u/g, LV electric on poles o/h, second line of HV cables on pylons	The location of utilities has been taken into account in the site selection and design process. It should be noted that Onshore Substation Option 7 has been discounted following the statutory consultation.	No
Mon_197_015_190623	S44	FREEPOST	In relation to Mona substation 7 (the one I am objecting to) why on earth based on construction costs, would you have cables from the Mona wind farm passing the National Grid Bodelwyddan Substation, connection point for your development, then returning back to the Bodelwyddan Substation, for the power to enter the National Grid, site 2 makes more economic sense, if all of the brown field sites have been dismissed as referenced above.	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference: F1.4).	Yes





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Mon_197_018_190623	S44	FREEPOST	The proposed substation No 7 is to have a new road constructed off Glascoed Road for the construction of said substation, as a road for construction and maintenance after construction, as the existing road to Cefn from St Asaph is not suitable. This road will be in full view of Upway and the neighbouring properties, more so as there will be an elevated section to cross the valley which contains a water course.	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference: F1.4).	Yes
Mon_197_019_190623	S44	FREEPOST	REDACTED Item 11 Attached Substation No 7 The attachment is the view looking directly south from the above address. I am aware under planning we do not have a right to a view.	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference: F1.4).	Yes
Mon_197_021_190623	S44	FREEPOST	It is quite surprising that the tenant farmer to the landlord Cefn Estate has been advised not to develop the dairy complex due to land being lost to his tenancy for the project.	Dalcour Maclaren on behalf of the Applicant are engaging and negotiating the rights required to deliver the project. This includes obtaining further information about the holding. Landowners and tenants are able to appoint an agent to advise on specific holding matters.	No
Mon_197_022_190623	S44	FREEPOST	The road to Cefn from St Asaph, forms part of the North Wales Pilgrims way, 134 miles long from Basingwerk Abbey to Bardsey Island, the proposed access to the substation will involve crossing this along with the cables to and from the said substation, no reference that I could see in your documentation	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference: F1.4).	Yes
Mon_197_024_190623	S44	FREEPOST	As we know form above there is a gas fired power station to the rear of the former Pilkingtons site for when weather conditions are not suitable for wind generated power, presumably this was sized for the current off shore wind farms, is there going to be another one to support this development and if so where is that going to be located, again another large structure	There are no plans to include a gas fired power station as part of the Mona Offshore Wind Project.	No
Mon_203_001_060423	S44	Email	I am writing to set out the Owners formal response to the consultation documents you have produced in association with the proposed Mona Offshore Wind Farm project. The Owners are freehold owners of the Property which will be directly affected by your proposals. Whilst the Owners are not opposed to the development of the project in principle, there are strong concerns regarding the current proposed onshore cable route and associated works at the Property, and within the vicinity of it.	The Applicant notes your response.	No
Mon_203_002_060423	S44	Email	Background The Property comprises of a restored 18th century farmhouse, a range of outbuildings (with consent for residential conversion) and approximately 8 acres of agricultural land. The Property has been for sale on the open market since early 2022. A sale was agreed during 2022, but the purchaser withdrew prior to completion. The Property was taken off the market for a brief period over Christmas 2022 and put back on the market in early 2023 at a reduced asking price. There have been 5 viewings in the past 2 months, but no offers put forward. In the consultation material the Property is located within Work Area 8 as shown on the image below. The extent of proposed Work Area 8 runs directly adjacent to the Western boundary of the Property and includes an area of field, hedge and access track to the Southern boundary. The Work Area is only 50m from the residential element of the Property. The design detail throughout the consultation material is extremely broad for this formal stage of feedback but it is clear that the Project will cause significant long-term disturbance to the Owners and the Property. The Estate Agent instructed to market the Property has indicated that proposals for the Project are already having an impact to interest from potential purchasers and this will inevitably become more apparent	Noted. Should a mitigated and substantiated claim be brought where losses have been incurred as a direct result of the project, such claims will be reviewed in accordance with the compensation code.	No





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			throughout the planning, construction and operational phases. Not only will there be a direct commercial impact, but the Owners plans to downsize and re-locate for retirement are now in jeopardy. There is a real possibility that the Owners will have to remain at the Property through years of disturbance or sell for a substantially reduced sum. The Owners overarching comments are that Works Area 8 should be moved off, and further away from, the Property in order to mitigate the significant impacts the Project will have on them.		
Mon_203_003_060423	S44	Email	 General Comments There is insufficient detail on the proposed design and locations of specific works in Works Area 8. Further information is required on the construction methodology, onshore cable route, haul road detail, and highway and transport detail before specific feedback can be provided. Information provided is not considered sufficient for compliance with s42 of the Planning Act 2008 and reconsultation will be necessary. 	Dalcour Maclaren on behalf of the applicant will be engaging in further detail on the points listed by way of heads of terms for the voluntary agreement for land rights required. Further information on this will also be provided for in the draft DCO.	No
			• The extent of Works Area 8 indicates that an area of the Property along the Southern boundary (adjacent to the public highway) will be required for the Project. This area contains a mature hedge planted by the Owners 20 years ago to provide privacy to the Property, a wooden electricity pole (and underground cable supplying the Property and neighbours) and the entrance to the main access to the Property. Any works in this area will cause significant disturbance to the Property for a significant period. Consider removal of this part of Works Area 8 from the Property and conducting all necessary works to the south of the public highway. This matter was raised by the Owners with Phillip Rew-Williamson at a public consultation event on 20th May 2023.		
			 Lack of detail in Code of Construction Practice, PEIR, draft DCO and Work Plans. Inadequate information provided for accurate assessment on the significance impacts to the Property from: o Construction traffic, vehicle movements and road closures 		
			- Noise		
			- Vibration		
			LightingDust/Fumes		
			Soil Storage and Management		
			Environmental impacts and mitigation areas		
			Footpath and PROW diversions		
			- Decommissioning		
			HDD locations and working requirements		
			Construction compounds and storage locations		
			Temporary and Permanent Works access routes		
			- Construction Programme		
			Further detailed proposals necessary in order to consider impacts and mitigation options ahead of DCO application.		
			As mitigation to the likely impacts above consideration should be given to:		
			 Movement of the cable route and haul road away from the Property. 		
			 Reduction of working hours to between 8am and 5pm Monday to Friday. 		
			 Movement of any construction access, storage compounds or HDD working areas away from the Property. 		





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			 Reduction in working hours and duration of HDD works. 		
			 The implementation of temporary or permanent screening between the Property and Works Area to reduce construction impacts. 		
			 Limits to any temporary road diversions or traffic management in the vicinity of the Property. 		
			Reduce/limit construction traffic on local road network.		
			 Moving works for the creation of visibility splays from the southern boundary of the Property to agricultural land to the south of the public highway. 		
			 Any temporary footpath/PROW diversions should be located away from the Property. 		
Mon_203_004_060423	S44	Email	Services The Property is crossed by a number of existing utility and private service media. Current proposals do not include adequate information or design tolerance for avoiding or diverting these existing services. All services are to be maintained throughout the duration of the Project.	Comments noted. Dalcour Maclaren will be discussing private services directly with landowner to ensure they are maintained or diverted if affected by the works area to ensure continued supply.	No
Mon_203_005_060423	S44	Email	Land Rights There has been little information provided as to the requirement for temporary and permanent land rights for which the project may seek Compulsory Acquisition powers. Further detail is required for consideration. Suitable provisions to mitigate the impact of any temporary or permanent land rights affecting the Property should be adopted to include: • 'Lift and shift' provisions	Noted. Following route refinement land owned has now been removed from the order limits.	No
			 Limited lifetime of rights to 30 years or as required for the construction, operation and decommissioning of the Project only. The same issue applies to any permanent rights of access that may be required to service the operational cable, but the consultation information is devoid of this information. Detailed proposals should be provided and consulted on with all affected parties prior to final submissions. 		
Mon_203_006_060423	S44	Email	Consultation and Engagement The Owners do not consider sufficient engagement has been undertaken with landowners to fully inform the project design in or to incorporate relevant mitigation. Further detailed engagement should continue with the Owners to ensure feedback and mitigation is fully considered ahead of any submission for the DCO.	Noted. Following route refinement land owned has now been removed from the order limits.	No
Mon_207_006_020623	S42/S44	Email	Onshore proximity Like Burbo Bank Extension, the Mona Offshore Wind Project's intended landfall is on the North Wales coastline and its intended connection to the grid is via the Bodelwyddan National Grid substation. The proposed substation locations are in close proximity to the existing Burbo Bank Extension substation. We would appreciate if more information could be provided on the proximity of the proposed substation options, the proximity of the onshore cable routes leading to the proposed substation options, and any impacts of this proximity. This may include cumulative effects on noise, potential cable crossings, or impacts on access to Burbo Bank Extension cables and substation for Operation and Maintenance and other work. These impacts require to be properly assessed, appropriately mitigated, and any remaining adverse effects appropriately compensated.	Noted. Meeting on 13th September 2023 providing more information on the project.	No
Mon_208_001_040623	S44	Email	I am writing to set out the Owners formal response to the consultation documents you have produced in association with the proposed Mona Offshore Wind Farm project.	Following the statutory consultation, the Onshore Cable Corridor has been refined to deselect options along the Onshore Cable Corridor and to reduce the width of the corridor. The refinement process was informed by comments	Yes



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			The Owner is freehold owner of the Property which will be directly affected by your proposals. The Property is not registered with the Land Registry and is outlined in Red on the plan at Appendix 1, with the Project boundary shaded Blue. An exert from Work Area 8 from the consultation works plans is shown below. Three areas of the Property are directly affected by the Project as follows: Area A – Woodland, hedge and verge at Nant Fawr. Area B – Land and verge adjacent to Spring Hill. Area C – Agricultural land adjacent to Spring Hill Whilst the Owner is not opposed to the development of the Project in principle, there are strong concerns regarding the current proposed onshore cable route and associated works at the Property, and within the vicinity of it.	received during the consultation process and by engineering design. The refined Onshore Cable Corridor now routes to the west of the land parcel, the furthest away from the property.	
Mon_208_002_040623	S44	Email	Background The Property comprises of two residential units at REDACTED, agricultural land and woodland. The extent of proposed Work Area 8 clips two field boundaries at locations A and B, the onshore cable corridor runs through the western corner of an agricultural field at location C, with the remainder of that field and a small field to the South of Spring Hill included within the wider extent of Work Area 8. The land is managed in-hand, but grazing rights are let to third parties on an annual basis. There are various environmental schemes that may be affected by the Project. The design detail throughout the consultation material is extremely broad for this formal stage of feedback but it is clear that the Project will cause significant long-term disturbance to the Owners and the Property. The Owners overarching comments are that Works Area 8 should be moved off, and further away from, the Property in order to mitigate the significant impacts the Project will have on them.	Following the statutory consultation, the Onshore Cable Corridor has been refined to deselect options along the Onshore Cable Corridor and to reduce the width of the corridor. The refinement process was informed by comments received during the consultation process and by engineering design. The refined Onshore Cable Corridor now routes to the west of the land parcel, the furthest away from the property.	Yes
Mon_208_003_040623	S44	Email	Area A This element of Work Area 8 appears to be included for highway works, access or the creation of required visibility splays. Whilst only a relatively small area, any works in this location would impact on a mature hedge and woodland that provides screening to the residential elements of the Property. Any temporary or permanent works here will be within 50m of the residential units at the Property and will be extremely disruptive to the Owner. Any residual land rights acquired under compulsory acquisition powers will significantly affect the value of the Property. It is requested that these proposed works are removed from the Project completely	Comments noted. Through refinement, the visibility splays from this area have been removed and works moved away from the dwelling.	No
Mon_208_004_040623	S44	Email	Area B This element of Work Area 8 appears to be included for highway works, access or the creation of required visibility splays. This is a relatively small area of hedgerow and agricultural land. Any works in this location, be they temporary or permanent, will be extremely disruptive to the Owner. Any residual land rights acquired under compulsory acquisition powers will significantly affect the value of the Property. It is requested that these proposed works are removed from the Project completely.	Comments noted. Through refinement, the visibility splays from this area have been removed and works moved away from the dwelling.	No
Mon_208_005_040623	S44	Email	Area C This element of Work Area 8 includes an area to the West for the cable corridor with the remainder of the field included for all other works scheduled within the draft DCO. Loss of this field entire field for the period of construction would be significant to the farming enterprise. Any additional land outside the cable corridor should be minimised. The route of any haul road, temporary/permanent	Comments noted. Land outside of the cable corridor has been reduced where possible to take these comments into account. Access routes have been identified and Dalcour Maclaren on behalf of the applicant will continue to discuss the proposals with the landowner and the assessment of the land value.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			access routes or work compounds in this area are not shown. If these are required, they should be located to minimise any impact. No ecological mitigation is shown within Works Area 8. If this is required it needs to be discussed and agreed in advance of DCO application with the Owner. Any residual land rights acquired under compulsory acquisition powers will significantly affect the value of the Property.		,
Mon_208_006_040623	S44	Email	There is insufficient detail on the proposed design and locations of specific works in Works Area 8. Further information is required on the construction methodology, onshore cable route, haul road detail, and highway and transport detail before specific feedback can be provided. Information provided is not considered sufficient for compliance with s42 of the Planning Act 2008 and re-consultation will be necessary.	The Applicant is committed to operating as part of the North Wales community for many decades to come, working in partnership with the local community to ensure any impacts created by the Project are identified and appropriately mitigated. Statutory consultation is a key part of the planning process, one which the Applicant takes seriously to engage and understand community views. Details of how the Statutory Consultation met the legislative requirements are presented in the Consultation Report (Document Reference E3) . Further detail on the refined cable route, haul road, and access routes are included in Volume 1, Chapter 3 Project Description of the Environmental Statement.	No
Mon_208_007_040623	S44	Email	Lack of detail in Code of Construction Practice, PEIR, draft DCO and Work Plans. Inadequate information provided for accurate assessment on the significance impacts to the Property from: Construction traffic, vehicle movements and road closures Noise Vibration Lighting Dust/Fumes Soil Storage and Management Environmental impacts and mitigation areas Footpath and PROW diversions Decommissioning HDD locations and working requirements Construction compounds and storage locations Temporary and Permanent Works access routes Construction Programme Further detailed proposals are necessary in order to consider impacts and mitigation options ahead of DCO application.	Dalcour Maclaren on behalf of the applicant will be engaging in further detail on the points listed by way of heads of terms for the voluntary agreement for land rights required. Further information on this will also be provided for in the draft DCO.	No
Mon_208_008_040623	S44	Email	 As mitigation to the likely impacts above consideration should be given to: Movement of the cable route and haul road away from the Property. Reduction of working hours to between 8am and 5pm Monday to Friday. Movement of any construction access, storage compounds or HDD working areas away from the Property. Reduction in working hours and duration of HDD works. The implementation of temporary or permanent screening between the Property and Works Area to reduce construction impacts. Limits to any temporary road diversions or traffic management in the vicinity of the Property. Reduce/limit construction traffic on local road network. 		No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			Moving works for the creation of visibility splays from the southern boundary of the Property to agricultural land to the south of the public highway.		
			 Any temporary footpath/PROW diversions should be located away from the Property. 		
Mon_208_009_040623	S44	Email	Services The Property is crossed by a number of existing utility and private service media. Current proposals do not include adequate information or design tolerance for avoiding or diverting these existing services. All services are to be maintained throughout the duration of the Project.	Comments noted. Dalcour Maclaren will be discussing private services directly with landowners and with utility companies to ensure they are maintained or diverted if affected by the works area to ensure continued supply.	No
Mon_208_010_040623	S44	Email	Land Rights There has been little information provided as to the requirement for temporary and permanent land rights for which the project may seek Compulsory Acquisition powers. Further detail is required for consideration. Suitable provisions to mitigate the impact of any temporary or permanent land rights affecting the Property should be adopted to include: • 'Lift and shift' provisions • Limited lifetime of rights to 30 years or as required for the construction, operation and decommissioning of the Project only. The same issue applies to any permanent rights of access that may be required to service the operational cable, but the consultation information is devoid of this information. Detailed proposals should be provided and consulted on with all affected parties prior to final submissions.	Comments noted. Dalcour Maclaren on behalf of the applicant will be negotiating the land rights being sort by the project and will provide the further detail requested.	No
Mon_209_001_040623	S44	Email	I am writing to set out the Owners formal response to the consultation documents you have produced in association with the proposed Mona Offshore Wind Farm project. The Owner is freehold owner of the Property which will be directly affected by your proposals. The Property is not registered with the Land Registry and is outlined in Red on the plan at Appendix 1, with the Project boundary shaded Blue. An excerpt from Work Area 8 of the consultation works plans is shown below. Three areas of the Property are directly affected by the Project, being two areas for highway improvement works and a small parcel of land west of the onshore cable corridor. Whilst the Owner is not opposed to the development of the Project in principle, there are concerns regarding the lack of design detail for the onshore cable route and associated works at the Property, and within the vicinity of it.	The Applicant notes your response.	No
Mon_209_002_040623	S44	Email	Background The Property comprises of the main farmhouse, the farmstead and approximately 200 acres of agricultural land. The Owner operates an intensive beef and sheep enterprise which relies heavily on the land around the farmstead to produce winter fodder. Any impact on local forage production will be reflected in the profitability and sustainability of the Owners business. It is critical to minimise the impact of the Project in this regard. The design detail throughout the consultation material is extremely broad for this formal stage of feedback but the Project will cause significant long-term disturbance to the Owners and the Property. Minimising highway improvement land take to the smallest area possible will mitigate impacts to the Owner and these areas should be reviewed	The Applicant notes your response.	No





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			and refined. There is a small parcel of land to the West of the onshore cable corridor that is included in Work Area 8. Whilst there is limited design detail to support the inclusion of this area, any works will have an impact on the residential elements of the Property. Detailed designs should consider and reflect minimising any impacts.		
Mon_209_003_040623	S44	Email	There is insufficient detail on the proposed design and locations of specific works in Works Area 8. Further information is required on the construction methodology, onshore cable route, haul road detail, and highway and transport detail before specific feedback can be provided. Information provided is not considered sufficient for compliance with s42 of the Planning Act 2008 and reconsultation will be necessary.	The Applicant notes your response.	No
Mon_209_004_040623	S44	Email	Lack of detail in Code of Construction Practice, PEIR, draft DCO and Work Plans. Inadequate information provided for accurate assessment on the significance impacts to the Property from: Construction traffic, vehicle movements and road closures Noise Vibration Lighting Dust/Fumes Soil Storage and Management Environmental impacts and mitigation areas Footpath and PROW diversions Decommissioning HDD locations and working requirements Construction compounds and storage locations Temporary and Permanent Works access routes Construction Programme Further detailed proposals are necessary in order to consider impacts and	Noted, it is noted this landowners land has been removed from the order limits however further information on this will be provided for in the draft DCO.	No
Mon_209_005_040623	S44	Email	 mitigation options ahead of DCO application As mitigation to the likely impacts above consideration should be given to: Movement of the cable route and haul road away from the Property. Reduction of working hours to between 8am and 5pm Monday to Friday. Movement of any construction access, storage compounds or HDD working areas away from the Property. Reduction in working hours and duration of HDD works. The implementation of temporary or permanent screening between the Property and Works Area to reduce construction impacts. Limits to any temporary road diversions or traffic management in the vicinity of the Property. Reduce/limit construction traffic on local road network Moving works for the creation of visibility splays from the southern boundary of the Property to agricultural land to the south of the public highway. Any temporary footpath/PROW diversions should be located away from the Property. 		No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_209_006_040623	S44	Email	Services The Property is crossed by a number of existing utility and private service media. Current proposals do not include adequate information or design tolerance for avoiding or diverting these existing services. All services are to be maintained throughout the duration of the Project	Comments noted. Dalcour Maclaren will be discussing private services directly with landowners and with utility companies to ensure they are maintained or diverted if affected by the works area to ensure continued supply.	No
Mon_209_007_040623	S44	Email	Land Rights There has been little information provided as to the requirement for temporary and permanent land rights for which the project may seek Compulsory Acquisition powers. Further detail is required for consideration. Suitable provisions to mitigate the impact of any temporary or permanent land rights affecting the Property should be adopted to include: • • 'Lift and shift' provisions	Noted. Following route refinement land owned has now been removed from the order limits.	No
			 Limited lifetime of rights to 30 years or as required for the construction, operation and decommissioning of the Project only. The same issue applies to any permanent rights of access that may be required to service the operational cable, but the consultation information is devoid of this information. Detailed proposals should be provided and consulted on with all affected parties prior to final submissions. 		

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D.25.6 Environmental Impact Assessment methodology table of responses



Table D.25. 6: Environmental Impact Assessment methodology table of responses

Unique Reference Identifier	Type of Consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_019_001_290423	S47	Email	I would like to know what impact this project is set to have on marine life in the Irish Sea, as a result of assessment, installation, maintenance and general operation. What assessments have been done in this regard?	The EIA and a summary of the surveys undertaken to inform the assessments on marine life are presented in the following chapters: - Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement - Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement - Volume 2, Chapter 4: Marine mammals of the Environmental Statement - Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement.	No
Mon_051_006_310523	S42	Email	Volume 1, Chapter 5: Environmental Impact Assessment (EIA) Methodology-Minor Comments The Isle of Man OWF (being developed by Ørsted) should be included in the Cumulative Impact Assessment as a Tier 3 development. Currently, a scoping report has not yet been submitted/reviewed for this project and is not in the public domain, however the Isle of Man OWF has been identified in other plans and programs.	The Mooir Vannin Offshore Wind Farm Scoping Report was published in October 2023. Accordingly, the Mooir Vannin Offshore Wind Farm is considered in the cumulative effects assessment as a Tier 2 project, where relevant.	No
Mon_054_101_010623	S42/S44	Email	In Table 2.6 Cumulative temporary habitat loss for the Mona Offshore Wind Project construction phase and other tier 1 plans/projects/activities in the CEA benthic subtidal and intertidal ecology study area, NRW(A) advise that the HyNet North West Hydrogen Pipeline Project should also be screened into the cumulative effects assessment for those sections of the project that are offshore and potentially for the cable landfall at the Point of Ayr. We note this project was screened out in Volume 5, Annex 5.1 Cumulative effects screening matrix, as no conceptual or physical effect receptor pathway was identified. There are three separate applications for HyNet, one of which could potentially interact with the Mona OWF.	The HyNet North West Hydrogen Pipeline Project has been included as a tier 3 project in the CEA in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and assessed accordingly although noting that only a Scoping Report was in the public domain at the time of writing and so no quantitative assessment has been possible.	No
Mon_060_006_010623	S42	Email	Volume 1, chapter 5: Environmental Impact Assessment methodology, Rev 03, dated 10/02/20235.4.3.6 Compiling the CEA long list JNCC would like to clarify in relation to the CEA method that there are circumstances in which built and operational projects should be included within the cumulative assessment. For example, where they have not been included within the environmental characterisation survey i.e.they were not operational when baseline surveys were undertaken and/or any residual impact may not have yet fed through to and been captured in estimates of baseline conditions. Additionally, built and operational projects should be included where there are ongoing impacts that are greater than predicted where there is no evidence that the impacts will dissipate over the lifetime of the project.	The cumulative effects assessment methodology includes a tiered approach to assessment of projects, plans and activities. Tier 1 includes those projects currently operational that were not operational when baseline data were collected, and/or those that are operational but have an evidenced ongoing impact (see Volume 1, Chapter 5, Environmental Impact Assessment methodology of the Environmental Statement).	No
Mon_066_043_020623	S42	Email	Matrix to Determine Effect Significance. We acknowledge that a matrix approach to determining the significance of effects on ecological features, is commonly used. However, this method often relies on value-rather than evidence-based judgements. The subjective evaluation of magnitude of impact and sensitivity/importance of receptors through expert judgement has led to many impact magnitudes and receptor importance/sensitivities being downgraded across topics in the PEIR. We also note that any effect that is concluded to be of moderate or major significance in the PEIR, is deemed to be 'significant' in EIA terms, whereas effects concluded to be of negligible or minor significance, are deemed 'not significant' in EIA terms. This cut-off could exclude any effect concluded to be less than moderate, in turn, this could lead to errors in assessing cumulative effects adequately.	For each of the impacts assessed in the Environmental Statement, a magnitude has been assigned and sensitivity has been assigned for each receptor potentially effected by that impact. The definition of magnitude is based on spatial extent of the impact, duration of the impact, frequency and reversibility of the impact. Example definitions of the magnitude levels have been taken from the Design Manual for Roads and Bridges Highways England 2020) and are presented in Volume 1, Chapter 5: EIA Methodology of the Environmental Statement. The definition of sensitivity is based, on vulnerability, recoverability and value of the receptor. The conclusions for each receptor is evidence based using the latest available information. Example definitions of the sensitivity levels are presented in Volume 1, Chapter 5: EIA Methodology of the Environmental Statement. Where definitions of magnitude or sensitivity are different for specific chapters, these are fully defined within that chapter. The conclusions of magnitude and sensitivity have been full justified for each receptor and impact in the Environmental Statement.	No





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				In cases where a range is suggested for the significance of effect, there remains the possibility that this may span the significance threshold (i.e. the range is given as minor to moderate). In such cases the final significance is based upon the topic expert's professional judgement as to which outcome delineates the most likely effect, with an explanation as to why this is the case.	
Mon_069_003_010623	S42	Email	The PEIR sets out the preliminary findings of the Environmental Impact Assessment (EIA) undertaken to date. 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 remaining Environmental Assessments process. The TSC had however expected there to be more emphasis and greater detail provided on proposed mitigation measures for the impacts identified to date as part of the PEIR, particularly as set out in the Statement of Community Consultation whereby "It (the PEIR) also sets out measures that could prevent, reduce or offset any environmental effects, identified as part of early assessments and consultation".	The Applicant notes your response. The chapters of the Environmental Statement have been updated to provided further detail on proposed mitigation i(Volume 2 to 4 of the Environmental Statement).	No
Mon_069_022_010623	S42	Email	Tables 7.24, 7.25, 7.26, Fig 7.8 and elsewhere. As noted, recommend inclusion of Ørsted Isle of Man windfarm and, under the appropriate heading, Crogga gas exploration/production projects.	Mooir Vannin and the Crogga licence have been included in the Environmental Statement where relevant (for example in Volume 2, Chapter 10: Other sea users of the Environmental Statement).	No
Mon_070_045_010623	S42	Email	In the Environmental Impact Assessment methodology (RPS_EOR0801_Mona_PEIR_Vol1_5_EIA Method FINAL) the following two paragraphs assert that: 5.3.6.16 Professional judgement is used to define the magnitude of impact and receptor sensitivity. The matrix is then used, together with professional judgement, to evaluate the significance of effect. The significance may be one, or a range of, no change, negligible, minor, moderate or major. In general, a significance of effect of moderate or greater is considered 'significant' in EIA terms. For each topic chapter, what is considered 'significant' will be clearly defined. Where further mitigation is not possible a residual significant effect may remain. 5.3.6.17In cases where a range is suggested for the significance of effect, there remains the possibility that this may span the significance threshold (i.e. the range is given as minor to moderate). In such cases the final significance is based upon the expert's professional judgement as to which outcome delineates the most likely effect, with an explanation as to why this is the case.	The Applicant has noted your response	No
Mon_070_048_010623	S42	Email	Significance threshold: The ES methodology (para. 5.3.6.16) states that any effect of Moderate or greater is considered 'significant'. This is considered to align with common practice. However, the SLVIA Method states that effects with a significance level of Substantial or Major have been deemed significant. There is a concern that this approach could lead to the underplaying of the significance of moderate effects normally considered to be significant in EIA.	All three NRW (2019) guidance documents were reviewed. Including one that sets out heights and distances of turbines relating to different magnitude, sensitivity, and significance of effects. SLVIA is not a scientific discipline and so magnitude, sensitivity and effects do not readily fall into different categories as the context changes. Also, on reviewing the NRW methodology, which drew on DTI (2005) guidance, transcription errors were noted. Therefore, the methodology used in the ES chapter reverted to that source guidance as well as GLVIA3 (recognised in the NRW 2019 guidance, as the most appropriate assessment guidance to use). This is explained more fully in Volume 6, Annex 8.4: Seascape, landscape and visual impact assessment methodology of the Environmental Statement. The DTI guidance considers that most 'moderate' significance of effects will not be significant. The methodology used in the SLVIA is in Volume 6, Annex 8.4: Seascape, landscape and visual impact assessment methodology, of the Environmental Statement. The assessment methodology used in the LVIA is in Volume 7, Annex 6.4: Landscape and visual impact assessment methodology of the Environmental Statement.	





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				In general, a significance of effect of moderate or greater is considered 'significant' in EIA terms, however for each topic chapter, what is considered 'significant' has been clearly defined (see Volume 1, Chapter 5: Environmental Impact Assessment methodology of the Environmental Statement). Note: GLVIA3 explains at paragraph 3.32 "Some practitioners use the phrase 'not significant in EIA terms' to describe those effects considered to fall below a 'threshold' of significance but this can potentially confuse since the phrase has no specific meaning in relation to the EIA Regulations."	
Mon_070_049_010623	S42	Email	The Council requests clarity if this deviation from common practice is necessary and intentional? If so, justification should be provided as to why this is different for the SLVIA than for the other ES topics.	SLVIA is not a scientific discipline and so magnitude, sensitivity and effects do not readily fall into different categories as the context changes, significance is more a continuum, so a range of X to Y is more accurate (i.e. they are very rarely either or). Note: GLVIA3 explains at paragraph 3.32 "Some practitioners use the phrase 'not significant in EIA terms' to describe those effects considered to fall below a 'threshold' of significance but this can potentially confuse since the phrase has no specific meaning in relation to the EIA Regulations." Also, on reviewing the NRW methodology, which drew on DTI (2005) guidance, transcription errors were noted. Therefore, the methodology used in the ES chapter reverted to that source guidance as well as GLVIA3 (recognised in the NRW 2019 guidance, as the most appropriate assessment guidance to use). This is explained more fully in the offshore methodology annex to the seascape and visual resources ES chapter. The DTI guidance considers that most 'moderate' significance of effects will not be significant. The methodology used in the SLVIA is in Volume 6, Annex 8.4: Seascape, landscape and visual impact assessment methodology, of the Environmental Statement. The assessment methodology used in the LVIA is in Volume 7, Annex 6.4: Landscape and visual impact assessment methodology, of the Environmental Statement.	No
Mon_070_050_010623	S42	Email	Selection of Categories for Sensitivity and magnitude: For some receptors throughout the assessment split categories has been used in assessing the sensitivity and magnitude of impact. For example, judging sensitivity of a receptor to be 'low to medium' rather than choosing either 'low' or 'medium'. This is not best practice and leads to confusion. It is considered that one category or the other should be confirmed. This will also assist in resolving the similar issue around significance categories under subheading below.	SLVIA is not a scientific discipline and so magnitude, sensitivity and effects do not readily fall into different categories as the context changes, significance is more a continuum, so a range of X to Y is more accurate (i.e. they are very rarely either or). Note: GLVIA3 explains at paragraph 3.32 "Some practitioners use the phrase 'not significant in EIA terms' to describe those effects considered to fall below a 'threshold' of significance but this can potentially confuse since the phrase has no specific meaning in relation to the EIA Regulations." Also, on reviewing the NRW methodology, which drew on DTI (2005) guidance, transcription errors were noted. Therefore, the methodology used in the ES chapter reverted to that source guidance as well as GLVIA3 (recognised in the NRW 2019 guidance, as the most appropriate assessment guidance to use). This is explained more fully in the offshore methodology annex to the seascape and visual resources ES chapter. The DTI guidance considers that most 'moderate' significance of effects will not be significant. The methodology used in the SLVIA is in Volume 6, Annex 8.4: Seascape, landscape and visual impact assessment methodology, of the Environmental Statement. The assessment methodology used in the LVIA is in Volume 7, Annex 6.4: Landscape and visual impact assessment methodology, of the Environmental Statement.	





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Mon_070_051_010623	S42	Email	Wording in significance matrix: In Table 5.8 of the EIA methodology and across the other topic chapters, the matrices include dual categories indicating that an effect could span the significance threshold, meaning effects could, for example, be either Moderate or Major. The key here is the use of the word 'or'	In cases where a range is suggested for the significance of effect, there remains the possibility that this may span the significance threshold (i.e. the range is given as minor to moderate). In such cases the final significance is based upon the topic expert's professional judgement as to which outcome delineates the most likely effect, with an explanation as to why this is the case (see Volume 1, Chapter 5: Environmental Impact Assessment methodology of the Environmental Statement).	No
Mon_070_052_010623	S42	Email	meaning that it should be decides and explain why an effect is categorised as either Minor or Moderate and explain their reasoning.	In cases where a range is suggested for the significance of effect, there remains the possibility that this may span the significance threshold (i.e. the range is given as minor to moderate). In such cases the final significance is based upon the topic expert's professional judgement as to which outcome delineates the most likely effect, with an explanation as to why this is the case (see Volume 1, Chapter 5: Environmental Impact Assessment methodology of the Environmental Statement).	No
Mon_070_053_010623	S42	Email	At Table 1.6 in the SLVIA Methodology these dual categories instead use the word 'to' in the matrix's dual categories. This implies that these effects always span the significance threshold. It is accepted that there may be instances where effects do genuinely span the threshold. However, through use of professional judgement, properly evidenced and explained in narrative text, these instances are likely to be the exception rather than the rule. Applying this method (using 'to rather than 'or') is considered likely to result in oversimplification in reporting many effects as a broad range rather than a more defined level of effect. Rectifying this would aid in the clarification of which effects are significant and which are not.	effects do not readily fall into different categories as the context changes, significance is more a continuum, so a range of X to Y is more accurate (i.e. they are very rarely either or). Note: GLVIA3 explains at paragraph 3.32 "Some practitioners use the phrase 'not significant in EIA terms' to describe those effects considered to fall below a 'threshold' of significance but this can potentially confuse	No
Mon_071_006_020623	S42	Email	West of Duddon Sands is expected to continue to operate to the full extent of its consents and licences, be maintained, and may in due course be upgraded and repowered, and will at some stage be decommissioned. Thus, any interactions and impact should be considered to be long-term and the various project stages of operation/maintenance, re-powering and decommissioning should be considered by the Mona Offshore Wind Project. In addition, it is important that during the long-term interaction of the projects, the West of Duddon Sands consents (including consent conditions) and any stakeholder agreements entered for the benefit of West of Duddon Sands are not adversely affected.	The spatial aspects of the West of Duddon Sands offshore wind farm have been considered in the cumulative screening for each topic. The outcomes of topic specific cumulative screening are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement.	Yes
Mon_072_083_010623	S47	Email	ONSHORE IMPACT9.1General(a)Whilst Stena Line acknowledges that the Mona Wind Farm will not be using the same Transmission Assets as the Morecambe and Morgan Wind Farms, given the relative close proximity of the landfalls, there is still likely to be a cumulative onshore impact on North Wales and Northwest England from the Wind Farms. It is therefore unclear why Mona Wind Farm has produced an assessment which does not consider the		Yes





Unique Reference Identifier	Type of Consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			cumulative impact of the Wind Farms or flagged that it is unable to do so due to the lack of information available on the Morecambe and Morgan Transmission Assets.		
Mon_115_003_000623	S44	Email	4. At the Cefn Meiriadog Consultation Event no indication was given of the cumulative impact of existing Windfarm infrastructure already in the immediate vicinity with the exception of the 13 acre proposed Awel y Môr substation indicated on a map. This tiny Community already houses a National Grid Substation, The Gwynt y Môr Offshore Substation, Burbank Extension Offshore Substation, Scottish Power Substation, a STOR Power Station, a pylon line and underground cabling connecting the Clocaenog Onshore Windfarm to the National Grid. There seems to be little or no coordination between any of these projects: each is considered in isolation. There is a need to adopt an overall coordinated approach to consider these development proposals.	relevant topic chapters within Volume 3 of the Environmental Statement. The projects, plans and activities considered for the cumulative effects assessment are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement.	No
Mon_002_001_080623	S42/S44	Email	A. PREFACE Reference is made to your email which gave notice of the formal pre-application consultation period and invited comments on draft Development Consent Order and Preliminary Environmental Information Report (PEIR) in accordance with the provisions of Section 42 of the Planning Act 2008. Comments on behalf of Denbighshire County Council ('the Council') take the form of an observations report which follows this preface. The response incorporates comments from the Council's planning and technical officers and elected Members of the Council. Please note; reference is made only to sections of the consultation documents which the Council wish to offer comment on. We advise that comments are provided on a without prejudice basis, based on the information available. The draft Consultation Response was presented to Denbighshire County Council Planning Committee on. The draft response has been amended in light of issues raised at Planning Committee, and the final response has been agreed with the elected Members. Any queries should be directed to Paul Mead, Development Manager.	The Applicant notes your response.	No
Mon_002_002_080623	S42/S44	Email	B. GENERAL COMMENTS ON THE PROPOSDED DEVELOPMENT The Council does not object to the principle of the development. The Council does, however, have significant concerns with regards to the cumulative impacts of onshore cabling, substation and other construction works in areas where similar, significant works have taken place or are likely to take place.	The onshore EIA and cumulative effects assessment is presented in relevant topic chapters within Volume 3 of the Environmental Statement. The projects, plans and activities considered for the cumulative effects assessment are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement (Document Reference F5.5.1).	No
Mon_002_019_080623	S42/S44	Email	VOLUME 1: CHAPTER 5 – EIA METHODOLOGY Section 5.4 – Cumulative Effects Assessment The following recent planning applications should be added to the cumulative impacts list in the PEIR. (refer to table in response).	Planning Applications: 40/2017/1232; 46/2019/0806; 46/2021/0159; 46/2021/1161 – These proposed developments were included in the Onshore CEA Longlist provided at PEIR for the Mona Offshore Wind Project. These proposed developments were not considered as part of the CEA for the Mona Offshore Wind Project as no conceptual or physical effect-receptor pathway was identified.	No
				Planning Application: 46/2021/0159 – This proposed development was included in the Onshore CEA Longlist provided at PEIR for the Mona Offshore Wind Project. Based on publicly available information, it was considered that construction of this proposed development would coincide with construction of the Mona Offshore Wind Project, which is anticipated to commence in 2026. As such, we can confirm that this proposed development was considered in topic specific CEA, where appropriate.	
				Planning Application: 40/2021/0825 – This proposed development was included in the Onshore CEA Longlist provided at PEIR for the Mona Offshore Wind Project. However, there was no publicly available data providing information with regard to construction and	





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				operation timescales for this proposed development. As such, this proposed development was not considered as part of the CEA for the Mona Offshore Wind Project on grounds of low data availability.	
Mon_207_012_020623	S42	Email	Cumulative and in-combination effects of projects It is important to ensure that all environmental impacts of your project are properly and fully assessed including any potential cumulative or in combination effects with Burbo Bank Extension. As an example, the impact upon Whooper Swan has been the subject of studies in relation to Burbo Bank Extension and these studies have shown Whooper Swan transits through or close to your proposed development. Whooper Swan have so far been omitted in your offshore ornithology chapter. We would be happy to discuss with you the Whooper Swan studies, and your approach to potential cumulative or in combination effects generally, in order to help ensure a compliant assessment.	Burbo Extension been considered in the cumulative screening for each topic. The outcomes of topic specific cumulative screening are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement. Project alone and cumulative collision assessment of Whopper swan are included in Volume 2, chapter 5: Offshore ornithology of the Environmental Statement.	No



D.25.7 Physical processes table of responses



Table D.25. 7: Physical processes table of responses.

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_020_001_010523	S47	Email	I would like to access the Bathymetry surveys carried out for the Environment Impact Reports by Gardline and XOcean. I believe all surveys are meant to become available through the UKHO Marine Data Portal at some stage; could you either provide a link to them (hopefully in the BAGS file format) or give me an indication of when they may become available? I can confirm that the potential wreck referenced as Mona_0113 is an old wooden sailing ship, very broken up. A H102 report has been made to the UKHO so an official	Volume 2, Annex 9.1: Marine archaeology technical report of the Environmental Statement has been updated to include this information and UKHO data will be reviewed for inclusion of UKHO record number should this be available for application. All relevant survey data will be uploaded to MEDIN and will be available in due course and will be issued to the UKHO in due course.	No
			UKHO reference number may be forthcoming in the future.		
Mon_051_037_310523	S42	Email	Minor Comments 9.2. The sediment and water quality information is presented across multiple sections of the report. The MMO would recommend that sediment contamination and quality be presented within one water and sediment quality section.	All sediment chemistry data is presented in Volume 6, Chapter 2.1: Benthic subtidal and intertidal ecology technical report of the Environmental Statement. Other chapters and reports summarise and cross-reference this as appropriate. Volume 2, Chapter 2: Benthic subtidal and intertidal ecology cross references the Benthic subtidal and intertidal ecology technical report within the relevant assessments relating to sediment and water quality (i.e. assessment of the potential release of sediment-bound contaminants). The WFD assessment (Volume 6, Chapter 2.2: Water Framework Directive coastal waters assessment) and the physical processes assessment (Volume 2, Chapter 1: Physical processes of the environmental statement) do the same, where water quality aspects and sediment contaminants analysis is presented.	No
Mon_053_009_010623	S47	Email	There can be sea-bed changes as windfarms can, over time, affect the depth of water, and can obstruct tidal streams (whether this affects marine life or not?) and that offshore windfarm (the noise from the turbines) can impact fauna and other marine life; and	In relation to physical processes, the impacts related to obstructions to tidal flow are detailed within the physical processes assessment (Volume 2, Chapter 1: Physical processes of the Environmental Statement). In relation to marine mammals, the impacts of changes in physical processes are scoped out of the assessment for marine mammals as agreed through the Scoping Opinion. Noise from operational turbines is assessed in Volume 2, Chapter 4: Marine Mammals of the Environmental Statement. In relation to fish and shellfish, the Mona Offshore Wind Project EIA Scoping Report (Mona Offshore Wind Limited, 2022) discusses the noise generated during operation of turbines, and provides full justification for scoping this impact out of further consideration for fish and shellfish ecology within the Environmental Statement (Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement).	Yes
Mon_054_002_010623	S42/S44	Email	Offshore Advice, Marine Physical Processes: NRW (A) do not consider that all necessary physical processes assessments have been undertaken. We provide advice on the further work necessary to adequately consider the potential impacts for the proposal.	The following responses address each issue individually.	No
Mon_054_004_010623	S42/S44	Email	Marine Water and Sediment Quality and Marine WFD: NRW (A) have concerns regarding the conclusions of several assessments. We provide advice on how to resolve these along with other corrections or clarifications required.	Comment noted and the Applicant's responses are provided against the detailed responses provided by NRW.	No
Mon_054_024_010623	S42/S44	Email	Offshore Advice. Physical Processes1.1.1Key Issues. The design and installation of the cable to landfall should take account of the natural envelope of beach profile change and the future erosion of the backshore. It is fundamental that the depth of installation across the intertidal is sufficient to minimise any future risk of exposure over the life of the wind farm due to short-term beach draw-down during storms or long-term beach erosion. NRW (A) recommend that topographic profiles and coring samples of the	In line with best practice cable burial depths the risk of cable exposure is minimised as detailed in Volume 1, Chapter 3: Project description of the Environmental Statement. There is a commitment to development and adherence to a Landfall Construction Method Statement which commits to the installation of Mona export cables via trenchless techniques under the intertidal area from below MLWS, where the exit pits will be located,	Yes





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			beach, across the intertidal, are undertaken to determine the safe burial depth. No reference has been given to the shoreline management plan policy for this section of coastline, which should be included in the baseline characterisation of the coast.	to onshore. Shoreline Management Plans have been considered within the Policy context of Volume 2, Chapter 1: Physical processes of the Environmental Statement.	
Mon_054_025_010623	S42/S44	Email	NRW (A) advise that the seabed morphological features either side of the cable corridor and in the nearshore zone are mapped and presented. It is important to understand the migratory routes of the sand wave systems, which will define the net direction of sediment transport. The geophysical data should also be able to determine sandwave heights and any data overlap over successive years, to determine the migration rates. The migration rates will ascertain the potential recovery of the sand waves if they are cleared and whether cable protection will be subsequently buried, or whether its alignment is such that it directly obstructs the bed load sediment transport processes and potentially impacts the sediment supply to the coast.	A review of sandwave migration on Constable Bank and further information on morphological features is presented within the physical processes baseline information in Volume 2, Chapter 1: Physical processes of the Environmental Statement. Shoreline Management Plans have been considered within the Policy context of Volume 2, Chapter 1: Physical processes of the Environmental Statement.	Yes
Mon_054_026_010623	S42/S44	Email	NRW (A) advise that further physical processes assessments are undertaken for the following: Sand wave clearance—NRW (A)are concerned by the large extent of sand wave clearance (33,072,196m3) required to install the cables and infrastructure at the array site and install cable along the export cable corridor to landfall. NRW (A) note that the seabed will be flattened i.e. sand wave lowered and sediment deposited in an adjacent trough. Whilst we appreciate that the sand will remain locally within the same sediment cell, we are concerned that the seabed morphology will not be able to recover and regenerate its migratory pattern of bedload sediment transport for many years, if the seabed features are flattened to ground level and the troughs filled in. It is necessary to understand how important the migrating sand waves are to the regional sediment budget and sediment transport system. Sand wave clearance is only assessed in relation to Suspended Sediment Concentration (SSC) plumes and sediment deposition following disturbance. Sand wave recoverability should be assessed morphodynamically for the Mona array and cable corridor area, and the impact caused by sand wave clearance assessed in line with other receptor groups, i.e. fish and benthic habitats.	Project refinement has been undertaken; corridor wandeave clearance widths have been refined and the volumes of sandwave clearance have been significantly reduced. It should be clarified that sandwaves will not be flattened – sand waves will be cleared and material sidecast in the vicinity of the sandwave therefore making this material readily available for redistribution and sandwave recovery. Sandwave recovery is discussed in the context of both localised and wider scale sediment transport assessment with Volume 2, Chapter 1: Physical processes of the Environmental Statement.	Yes
Mon_054_027_010623	S42/S44	Email	Cable protection—there is a significant amount of cable protection proposed, which will lead to long-term habitat loss and change of seabed substrate and supporting habitat for other receptors (i.e. birds, benthic). Permanent presence of the rock will potentially alter the seabed sediment transport processes leading to permanent alterations to the seabed morphodynamics. NRW (A)strongly advise that cable protection measures are minimised as much as possible. It is not clear from the PEIR where the cable protection will be required. Once the locations are known, an assessment should be carried out to determine how the cable protection will affect the bed load sediment transport processes. This is of particular importance if located on Annex 1 sand bank systems, given that they are 3m high and will act like a groyne—interrupting the bedload sediment transport if placed perpendicular to the direction of transport. This is particularly relevant in nearshore areas where there is a supply of sediment towards the coast from offshore sand banks. It is fundamental to understand the baseline sediment transport processes close to the coastline and over Annex 1 bank systems, to help inform the assessment of impacts caused by cable protection.	nearshore areas the use of cable protection will be minimised. Further detail on cable protection measures can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement.	Yes
Mon_054_028_010623	S42/S44	Email	Morphodynamics of Annex 1 Habitats—no assessment has been carried out to determine the impact to the morphodynamics of the Annex 1 sand bank system of Constable Bank and the Menai Strait and Conwy Bay SAC from sand wave clearance and cable laying activities, and the recoverability of the sand waves from such activities. No assessment has been carried out to determine the impact on the form and function of Constable Bank and the Menai Strait and Conwy Bay SAC from long-term placement of cable protection across the sand bank systems. Whilst NRW (A)appreciate that the intention is to minimise sand wave clearance and cable protection on Constable Bank and the Menai Strait and Conwy Bay SAC, we advise assessment of the alteration to	Bay SAC, and to use trenchless techniques at the landfall so no cable	Yes



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			the morphodynamics based on the same conditions as the Benthic Ecology assessment (PEIR Chapter 7 Sections7.8.4.6 and 7.8.4.7), that is placement of 39440m2 cable protection on Constable Bank and placement of 28000m2cable protection in the Menai Strait and Conwy Bay SAC.	Strait and Conwy Bay SAC. No cable protection higher than 70 cm will be installed within in the Menai Strait and Conwy Bay SAC. Additionally, the percentage of export cable requiring cable protection will not exceed 10% of the total length of the export cable within the Conwy Bay and Menai Straits SAC. No more than 5% reduction in water depth (referenced to Chart Datum) will occur at any point along the Mona offshore cable corridor without prior written approval from the Licensing Authority in consultation with the MCA. Further detail on morphodynamics and measures to address potential impacts to physical processes can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement.	
Mon_054_029_010623	S42/S44	Email	Cable installation to landfall Horizontal Directional Drilling (HDD)—no assessment has been carried out to determine the impacts caused by the HDD option for cable connection to landfall. There is the potential for bentonite clay to be released and advected from the drilling location potentially much further than the coarser intertidal seabed sediments. Exit pits located in the intertidal may also require cable protection, which could then interrupt the longshore sediment transport processes and reduce the sediment supply down coast, potentially leading to coastal erosion.	Since the submission of the PEIR, open cut trenching has been removed from the project design and all export cables at the landfall will be installed via trenchless techniques, meaning that no cable protection will be required above seabed level in the intertidal area. An assessment of the potential release of bentonite during trenchless techniques has been added to the assessment of increased suspended sediment concentrations and sediment deposition on benthic receptors in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology.	Yes
Mon_054_030_010623	S42/S44	Email	Cable installation to landfall Trenching-no assessment has been carried out to determine whether the trenched cable across the intertidal could become exposed in the future, which could potentially necessitate the requirement for cable protection.	The Cable Specification and Installation Plan will outline measures such as appropriate cable trenching depths to minimise cable exposure and stranded assets. No above seabed level cable protection required in the intertidal area as trenchless techniques will be used at the landfall. Further information can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement.	Yes
Mon_054_031_010623	S42/S44	Email	Secondary Scour—no consideration has been given to the potential for secondary scour to arise around the scour and cable protection during the 35-year operational phase of the wind farm. It is not proposed to remove the scour/cable protection from the seabed on decommissioning and as a result the rock dump will continue to cause scour beyond the lifetime of the windfarm with the potential to cause long-term morphology changes to sand wave and sand bank systems. Secondary scour has not been considered in the physical processes impact assessment and should be included	foundations to reduce scour. The scour protection measures will be	Yes
Mon_054_032_010623	S42/S44	Email	Detailed Comments1.1.2.1Volume 6, Annex 6.1: Physical Processes Technical Report. With reference to Figure 1.57 Seabed substrate geology EMODnet, bathymetric data for the nearshore zone and coastline appears to be absent. NRW (A) request confirmation that there is sufficient bathymetry baseline data to characterise the nearshore zone and North Wales coast where the cable is proposed to make landfall.	The bathymetry data coverage is presented in Volume 6, Annex 1.1: Physical processes technical report of the Environmental Statement. It includes coverage up to the shoreline with data from MEDIN and further data was sourced from the DEFRA Survey Data Download site. Locations of additional sediment sample data collected as part of this project is also presented within the Physical Processes baseline information in Volume 2, Chapter 1: Physical processes of the Environmental Statement.	No
Mon_054_033_010623	S42/S44	Email	In Section 1.6.6.5Sediment transport, it would benefit baseline understanding of the sediment transport processes, if the residual current vectors were overlain with a high resolution bathymetric map showing sand wave fields, sand bank systems, rock reefs etc. Rate and direction of sand wave migration is also important in understanding the seabed morphodynamics for the study area, particularly if cable protection on the seabed acts as an obstruction to bed load transport and potentially impacts coastal supply or affects the form and function of the Constable Bank system –an Annex 1 feature. Knowledge of the sediment transport rate and direction will facilitate the impact assessment process. Furthermore, it is not clear from the model outputs that the region is a sediment sink. This assumption requires further evidence and explanation.	This additional data is presented within the Physical Processes baseline information in Volume 2, Chapter 1: Physical processes of the Environmental Statement and Volume 6, Annex 1.1: Physical processes technical report.	No
Mon_054_034_010623	S42/S44	Email	With reference to Section 1.6.6.5 Sediment transport, in order to fully understand the bed load sediment transport processes coupled with waves, the residual currents	The baseline data presented was design to present and overview of prevailing conditions. In terms of interruption of existing sediment	Yes



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			approaching from the North-West, North and East for 1:1 and 1:20 year events should be presented to determine whether there is a reversal in sediment transport during extreme storm events.	transport regimes, cable protection will only be used where sufficient trenching depths cannot be achieved. There is a commitment not to place any cable protection in Constable Bank (an Annex 1 habitat outside of a designated site), to minimize cable protection within the Menai Straights and Conwy Bay SAC, and to use trenchless techniques at the landfall so no cable installation will be required above seabed level in the intertidal area. In nearshore areas the use of cable protection will be minimised. Further detail can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement.	
Mon_054_035_010623	S42/S44	Email	With reference to Section 1.7 Potential Environmental Changes (Numerical Modelling), NRW (A) confirm that the model presented to describe the physical processes (tides, waves and sediment transport) has been adequately calibrated and validated and provides a good prediction of the baseline physical processes into the nearshore zone. We recommend that a scale-bar is added to all modelled simulation outputs. Furthermore, to aid in the assessment of physical processes impacts on sensitive sites, NRW (A)advise that designated SACs and Annex 1 habitats such as Constable Bank are overlaid on the model simulation map outputs. This will enable a determination to be made on the extent of impact to the sites from changes in hydrodynamics and the spatial extent of the SSC plume impacts and subsequent sediment deposition.	The modelled output presented in Volume 6, Annex 1.1: Physical processes technical report of the Environmental Statement includes scale bars and relevant designated areas to support the interpretation of findings.	No
Mon_054_036_010623	S42/S44	Email	With reference to Figure 1.65 Modelled Array and Trenching Route Indicative Layout, the positioning of the turbine legs, inter array, interconnector cables and predicted cable protection and scour protection has been included in the physical processes modelling impact assessment for the Mona Array Area. The export cable corridor, however, has not been presented in the same way as the Array and nothing has been presented in the PEIR or supporting technical reports to show where the cable protection will be located along the export cable corridor. It is therefore not clear that the hydrodynamic simulations with the addition of the infrastructure, and the difference plots (proposed minus the baseline condition for currents, waves, littoral currents and residual currents),accurately predicts the total change that could arise along the cable corridor, particularly if the cable protection is located in shallow water of the nearshore zone where wave impacts will be greater.	The indicative layout used within the modelling study applied cable protection to a height of 3 m in regions where trenching depth may not be achieved. Seabed classification was used to identify these areas (i.e. in the vicinity of moraines). In nearshore areas the use of cable protection will be minimised. Further detail can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement.	Yes
Mon_054_037_010623	S42/S44	Email	With reference to Section 1.7.2.4 Wave Climate (Post Construction), there is a degree of uncertainty where the cable protection will be placed along the cable corridor and it cannot be assumed at this stage that there will be no cable protection located in the nearshore zone, on the Constable Bank system, in the Menai Strait and Conwy Bay SAC, or across the intertidal, particularly if HDD is the chosen option for cable landfall, which could potentially require exit pits cable protection if located between MHWS and MLWS. As such, until the cable locations are known for certain, NRW (A)cannot agree that the changes to wave climate would be indiscernible from the baseline wave climate and would not have an impact on the shoreline or nearshore banks.	Cable protection will only be used where sufficient trenching depths cannot be achieved. There is a commitment not to place any cable protection in Constable Bank (an Annex 1 habitat outside of a designated site), to minimize cable protection within the Menai Straights and Conwy Bay SAC, and to use trenchless techniques at the landfall so no cable installation will be required above seabed level in the intertidal area. In nearshore areas the use of cable protection will be minimised. Further detail can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement.	Yes
Mon_054_038_010623	S42/S44	Email	With reference to Figures1.165 –1.168 Modelling of SSC plumes caused by trenching across intertidal, the model assumes that the suspended sediment plumes generated during trenching across the intertidal are transported by tide only currents. NRW (A) request confirmation whether the currents generated by the model include wave induced currents (alongshore currents which are generated by wave breaking at an angle to the shore) as well as tide driven currents? The transport of SSC during intertidal trenching and the sediment deposition will be strongly dependent on the wave conditions at the time of trenching in addition to the tidal state (spring or neap, flood or ebb). Please justify why tide only currents are chosen to simulate suspended sediment transport across the intertidal if this is the case.	It is recognised that the dispersion and subsequent deposition may be affected by a range of factors including tidal phase and meteorological conditions. Significant wind and/or wave driven currents have the potential to increase the size of a sediment plume produced by seabed preparation or installation operations. However, these conditions would also inherently decrease suspended sediment concentrations (SSC) and deposition levels as a direct consequence of increased dispersion. It is noted that during adverse weather background turbidity levels would be increased and it is also unlikely that marine based works would be undertaken for operational safety reasons. The modelling of sediment release was therefore undertaken under tide only conditions using a variety of tidal ranges to provide an indication of potential SSC and deposition levels.	No



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Mon_054_039_010623	S42/S44	Email	With reference to Section 1.8 Potential Changes during construction(and Volume 2,Chapter 6,Table 6.12: Maximum design scenario considered for the assessment of potential impacts on physical processes—Seabed preparation and sand wave clearance in Array and export cable corridor), NRW(A) are concerned by the large extent of sand wave clearance (33,072,196m3) required to install the cables and infrastructure at the Array site and install cable along the export cable corridor to landfall. The seabed will be flattened i.e. sand wave lowered and sediment deposited in adjacent trough. Whilst NRW (A)appreciate that the sand will remain locally within the same sediment cell, we are concerned that the seabed morphology will not be able to recover and regenerate its migratory pattern of bedload sediment transport for many years if the seabed features are flattened to ground level and the troughs filled in. How important are the migrating sand waves to the regional sediment budget and sediment transport system? Sand wave recoverability should be assessed morphodynamically for the Mona Array and cable corridor area and the impact caused by sand wave clearance assessed in line with other receptor groups, i.e. fish and benthic habitats.	Project refinement has been undertaken; corridor widths have been refined and the volumes of sandwave clearance have been significantly reduced. It should be clarified that sandwaves will not be flattened – sand waves will be cleared and material sidecast in the vicinity of the sandwave therefore making this material readily available for redistribution and sandwave recovery.	Yes
Mon_054_040_010623	S42/S44	Email	NRW (A) note in Figures 1.98 to 1.105 Offshore export cable sand wave clearance SSC plumes imulation, that the representative SSC plume simulations of dredging activity along the export cable corridor have been carried out some distance from Constable Bank and the Menai Strait and Conwy Bay SAC. It would be beneficial to rerun the dredge simulation for activities within the Annex 1 Habitats and overlay any designated habitat features in the SAC that may be impacted by the SSC plume and sediment deposition.	The overlay of the extent of Constable Bank illustrates that the sandwave clearance modelled is immediately to the north of the Bank, i.e. in very close proximity. Modelling results have been presented alongside the Constable Bank have been presented in Volume 2, Chapter 1: Physical processes of the Environmental Statement. The modelling results have been presented alongside the features of the Menai Strait and Conwy Bay SAC within the HRA Stage 2 ISAA-Part 2.	No
Mon_054_041_010623	S42/S44	Email	Regarding Section 1.8.4.11 Offshore export cables (SSC Plumes during Cable Installation),NRW (A) advise that suspended sediment transport will be driven by the prevailing wind direction and wave activity as well as the flood and ebb tidal excursion. If for example, the trenching occurred during a northerly wind then the SSC would also be driven towards the coast in the surface waters affected by the wind driven circulation. The modelling is conducted for tide only conditions and does not include the effect of wind driven circulation, which will be important closer to the coast as the water depth shallows and the waves play a more prominent role. NRW (A)recommend revisiting the modelling and including wave effects, particularly from the North-west and North.	consequence of increased dispersion. It is noted that during adverse weather background turbidity levels would be increased and it is also	No
Mon_054_043_010623	S42/S44	Email	It is not clear at this stage where the cable protection will be required. An assessment should be carried out to determine how the cable protection will affect the bed load sediment transport processes, especially if located on Annex 1 sand bank systems, given that they are 3m high and will act like a groyne, particularly if placed perpendicular to the transport pathways. This is of particular relevance in nearshore areas where there is a supply of sediment towards the coast.	Investigations have been undertaken to identify opportunities to limit cable protection on the Constable Bank and within the Menai Strait and Conwy Bay SAC. No cable protection is now required within Constable Bank. No cable protection higher than 70 cm will be installed within in the Menai Strait and Conwy Bay SAC. Additionally, the percentage of export cable requiring cable protection will not exceed 10% of the total length of the export cable within the Conwy Bay and Menai Straits SAC. If and where cable protection is required in shallow subtidal conditions the measures used will be with sufficiently low profile to cause minimal changes to wave, tide and sediment transport. No more than 5% reduction in water depth (referenced to Chart Datum) will occur at any point along the Mona offshore cable corridor without prior written approval from the Licensing Authority in consultation with the MCA. Further detail can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement.	Yes
Mon_054_044_010623	S42/S44	Email	Determining impact to surrounding seabed morphodynamics from sediment blockage effects caused by cable protection requires high resolution bathymetric survey data. NRW (A) advise that the bathymetric data sets outside the array and cable corridor are of a sufficient resolution to characterise the bed load migration rates and orientation of	The survey dataset available from MEDIN were typically 10 m resolution. The datasets used for analysis of sandwave feature across and inshore of Constable Bank were 1 m to 2 m resolution.	No





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			the sand wave fields, particularly around Constable bank and where the cable corridor overlaps the Conwy Bay and Menai Strait SAC		
Mon_054_048_010623	S42/S44	Email	Volume 2, Chapter 6 Preliminary Environmental Impact Report: Physical Processes With reference to Table 6.12 Maximum design scenario considered for the assessment of potential impacts on physical processes(Intertidal export cables: Repair of up to 1.6km of intertidal cable every five years), NRW (A) advise that consideration must also be given to the possibility that the cable trenched across the intertidal could become exposed, which would require cable protection measures as a worst-case scenario. The potential for cable protection across the intertidal should be considered in the assessment of impacts.	Further detail can be found in Volume 2, Chapter 1: Physical processes	Yes
Mon_054_049_010623	S42/S44	Email	With reference to Table 6.13: Impacts scoped out of the assessment for physical processes (Scour of seabed sediments during the construction, operations and maintenance phases), NRW (A) disagree with scoping out scour of seabed sediments as it is not known at present where the cable protection will be located along the cable corridor. Secondary scour will occur around cable protection and scour protection proposed in the array and along the cable corridor, particularly if cable protection is located in shallow nearshore areas and where the seabed sediment is mobile.	An assessment of secondary scour can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement. A Cable Specification and Installation Plan will be developed with details of scour protection management to be used around offshore structures and foundations to reduce scour. The scour protection measures will be subject to engineering design to ensure they minimise as much as practical the occurrence of scour.	Yes
Mon_054_050_010623	S42/S44	Email	With reference to Section6.8.2.12 Increase in suspended sediments due to construction, operations and maintenance and/or decommissioning related activities, and the potential impact to physical features, the assessment is in relation to SSC plumes and subsequent deposition following sand wave clearance. It does not take into account the alteration to seabed morphology and the rate of recovery of seabed features following sand wave clearance and/or placement of cable protection. The impact on sensitive features caused by the changes to morphodynamics are presently unknown as the survey data has not yet been presented. As such, NRW (A) cannot agree that the magnitude is low for the receptors within the Menai Strait and Conwy Bay SAC and Constable Bank, as no assessment has been carried out to determine if the morphology of the seabed can recover following sand wave clearance or is not altered following the installation of cable protection.	Since PEIR, corridor widths have been refined and the volumes of sandwave clearance have been significantly reduced. It should be clarified that sandwaves will not be flattened – sand waves will be cleared and material sidecast in the vicinity of the sandwave therefore making this material readily available for redistribution and sandwave recovery. No sandwave clearance will be required within the Menai Strait and Conwy Bay SAC.	
Mon_054_051_010623	S42/S44	Email	Section 6.8.2.13 Sensitivity of the receptor, states "The sedimentation identified is localised and composed of native material therefore the structure and function of the designated features is of low vulnerability and recoverable. The sensitivity of the receptor to changes as a result of seabed preparation, foundation installation and cable installation is therefore considered to be low". Whilst this may be the case with regard to deposition of the SSC plume, the sensitivity of the receptor to changes as a result of seabed preparation, foundation installation and cable installation should also take into account the physical disturbance to the supporting habitats and destruction/alteration of the seabed morphology which may take many years to recover following sand wave clearance. The placement of cable protection will cause a change to seabed substrate as well altering the bedload sediment transport processes, which could potentially change the form and function of the Annex 1 sand bank system.		
Mon_054_052_010623	S42/S44	Email	With reference to Section 6.8.3 Impacts to the tidal regime due to presence of infrastructure and the associated potential impacts along adjacent shorelines, whilst NRW (A) agree that cable installation in the intertidal region through trenching will not cause any alteration to flow, we cannot exclude the possibility of the cable being exposed in the future and then necessitating the requirement for cable protection. Future cable maintenance should factor in the possibility of cable exposure across the intertidal and the requirement for cable protection, and reassess the impacts to the tide, wave and sediment transport processes across the intertidal and along adjacent shorelines.	The Cable Specification and Installation Plan will outline measures such as appropriate cable trenching depths to minimise cable exposure and stranded assets. If and where cable protection is required in shallow subtidal conditions the measured used will be with sufficiently low profile to cause minimal changes to wave, tide and sediment transport. No more than 5% reduction in water depth (referenced to Chart Datum) will occur at any point along the Mona offshore cable corridor without prior written approval from the Licensing Authority in consultation with the MCA. No above seabed level cable protection required in the intertidal area as	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				trenchless techniques will be used at the landfall. Further detail can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement.	
Mon_054_053_010623	S42/S44	Email	With reference to Section 6.8.4 Impacts to the wave regime due to presence of infrastructure and the associated potential impacts along adjacent shorelines, we do not know where along the cable corridor cable protection will be placed and the modelling does not include cable protection or protection at the cable crossings outside the Mona Array. If in the event cable protection is located in the nearshore area or across the intertidal or on Constable Bank or in the Menai Strait and Conwy Bay SAC, then the potential impact to tides, waves, sediment transport processes, seabed/beach morphology and associated potential impacts along adjacent shorelines should be assessed.	The indicative layout used within the modelling study applied cable protection to a height of 3 m in regions where trenching depth may not be achieved. Seabed classification was used to identify these areas (i.e. in the vicinity of moraines). Investigations have bene undertaken to identify opportunities to limit cable protection within the Menai Strait and Conwy Bay SAC. No cable protection required within Constable Bank. If and where cable protection is required in shallow subtidal conditions the measured used will be with sufficiently low profile to cause minimal changes to wave, tide and sediment transport.	Yes
Mon_054_054_010623	S42/S44	Email	With reference to Section 6.8.5.10Impacts to sediment transport and sediment transport pathways due to presence of infrastructure and associated potential impacts to physical features and bathymetry, NRW (A) cannot agree with the magnitude of impact until the amount of sand wave clearance and the placement of cable protection is known and assessed.	Since PEIR, corridor widths have been refined and the volumes of sandwave clearance have been significantly reduced. It should be clarified that sandwaves will not be flattened – sand waves will be cleared and material sidecast in the vicinity of the sandwave therefore making this material readily available for redistribution and sandwave recovery. No sandwave clearance will be required within the Menai Strait and Conwy Bay SAC. If and where cable protection is required in shallow subtidal conditions the measured used will be with sufficiently low profile to cause minimal changes to wave, tide and sediment transport. No more than 5% reduction in water depth (referenced to Chart Datum) will occur at any point along the Mona offshore cable corridor without prior written approval from the Licensing Authority in consultation with the MCA. Further detail can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement.	
Mon_054_055_010623	S42/S44	Email	With reference to Sections6.8.5.11 and 6.8.5.12 Sensitivity of receptor, it is not known if cable protection will be placed on Constable bank or within the Menai Strait and Conwy Bay SAC and how much sand wave clearance will be conducted. Both activities will interrupt sediment transport processes with the potential to affect the structure and function of the Annex 1 habitat sand bank systems. The current modelling assessment only considers the turbine foundations and scour protection at the array. A more detailed assessment is required for Constable Bank and Menai Strait and Conwy Bay SAC if it is deemed necessary to install cable protection.	Since PEIR, corridor widths have been refined and the volumes of sandwave clearance have been significantly reduced. It should be clarified that sandwaves will not be flattened – sand waves will be cleared and material sidecast in the vicinity of the sandwave therefore making this material readily available for redistribution and sandwave recovery. No sandwave clearance will be required within the Menai Strait and Conwy Bay SAC. No cable protection required within Constable Bank. Sandwave clearance on Constable Bank will be minimised by restricting any sandwave clearance to within the swept path width (20 m) of the cable burial tool. If and where cable protection is required in shallow subtidal conditions the measured used will be with sufficiently low profile to cause minimal changes to wave, tide and sediment transport. No more than 5% reduction in water depth (referenced to Chart Datum) will occur at any point along the Mona offshore cable corridor without prior written approval from the Licensing Authority in consultation with the MCA. Further detail can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement.	
Mon_054_063_010623	S42/S44	Email	Further information is required to understand the potential for cable protection to become exposed in the intertidal.	The Cable Specification and Installation Plan will outline measures such as appropriate cable trenching depths to minimise cable exposure and stranded assets. No above seabed level cable protection required in the intertidal area as trenchless techniques will be used at the landfall. More detail can be found in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	Yes
Mon_054_070_010623	S42/S44	Email	With reference to Section 7.4.6.4 Designated Sites, it would be useful to overlap the project specific outputs of the physical processes assessment with the Annex I features of the Menai Strait and Conwy Bay SAC in order to see the spatial extent of the	The modelled output presented in Volume 6, Annex 1.1: Physical processes technical report of the Environmental Statement includes scale bars and the applicable designated areas to aid in the interpretation of	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			physical processes impacts in the SAC. Without this, it is difficult to determine the potential for any interaction with other features of the SAC, for example, the Annex I Submerged or partially submerged sea caves feature, to justify their being screened out of the assessment	findings. The appropriate text relating to the modelled outputs and the Menai Straights and Conwy Bay SAC has been incorporated into Volume 2, Chapter 2: Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	
Mon_054_075_010623	S42/S44	Email	With reference to Section 7.8.1 Temporary habitat loss/disturbance, NRW (A) agree that as the sediment will be deposited close to its original location, it is likely that it will be similar to the seabed sediment increasing the potential for survival and recolonisation of benthic species. However, recovery of benthic habitats within Constable Bank will depend in part on the impacts to the physical processes of the sandbank, which have not been assessed–please refer to Section 1.1Physical Processes of the current document. NRW (A) are unable to agree with the conclusions until this assessment has been carried out.	As outlined in Table 2.18 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement the Mona Offshore Wind Project has committed to no sandwave clearance within Constable Bank. The assessments presented in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement have been updated accordingly and assessments provided for the impact of cable installation on habitats in Constable Bank.	Yes
Mon_054_081_010623	S42/S44	Email	With reference to Section 7.8.2.15-16Intertidal habitat IEFs, NRW(A) note in Volume 6, Annex 6.1: Physical processes technical report, Figures1.166and1.168Suspended sediment concentration ebb –offshore export cables in the intertidal area installation,t hat the suspended sediment plume created during the intertidal cable trenching could potentially reach the <i>S.alveolata</i> reef in high concentrations during the ebb tide. NRW (A) are therefore unable to agree that the impact to the <i>S. alveolata</i> reef from potential increases in SSC will be of negligible magnitude until further evidence is provided to support these conclusions. This should include a figure overlaying the extent of the sediment plume against the mapped habitat and figures on the potential amount of sediment deposition on the reef. Please also refer to Section 1.1Physical Processes of the current document and note that this comment also applies to potential impacts to the M. edulis beds and the sublittoral very soft chalk or clay with piddocks IEF.	Since the submission of the PEIR, the boundary of the Mona Offshore Cable Corridor and Access Area has been amended, to exclude the <i>Sabellaria alveolata</i> reef and Mytilus edulis bed at the landfall. The <i>S. alveolata</i> reef is now located more than 250 m to the west of the intertidal part of the Mona Offshore Cable Corridor and Access Area. Furthermore, since the submission of the PEIR, open cut trenching has been removed from the PDE and all export cables at the landfall will be installed via trenchless techniques. There will therefore be no SSC arising from trenching in the intertidal to impact on the <i>S. alveolata</i> reef. An assessment of the impacts of trenching in the subtidal on receptors at the landfall is included in section 2.9.2 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology chapter of the Environmental Statement, and this has been updated to include further detail regarding the predicted nature of extent of plumes resulting from subtidal export cable installation near the landfall. Significant effects on the <i>S. alveolata</i> , Mytilus bed and clay with piddocks IEFs are not predicted.	Yes
Mon_054_113_010623	S42/S44	Email	With reference to Section 1.7.3.107-122Changes in Physical Processes, further information on the potential locations of the cable protection inside and outside the SAC is required in order to understand any potential impacts to changes in physical processes which may have indirect impacts on Annex I benthic features of the SAC. Furthermore no assessment on secondary scour has been carried out. Please refer to Section 1.1Physical Processes of the current document for further information.	Cable protection will only be used where sufficient trenching depths cannot be achieved. Investigations have been undertaken to identify opportunities to limit cable protection within the Menai Strait and Conwy Bay SAC. No cable protection higher than 70 cm will be installed within in the Menai Strait and Conwy Bay SAC. Additionally, the percentage of export cable requiring cable protection will not exceed 10% of the total length of the export cable within the Conwy Bay and Menai Straits SAC. If and where cable protection is required in shallow subtidal conditions the measures used will be with sufficiently low profile to cause minimal changes to wave, tide and sediment transport. No more than 5% reduction in water depth (referenced to Chart Datum) will occur at any point along the Mona offshore cable corridor without prior written approval from the Licensing Authority in consultation with the MCA. Further detail can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement. An assessment of secondary scour can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement. A Cable Specification and Installation Plan will be developed with details of scour protection management to be used around offshore structures and foundations to reduce scour. The scour protection measures will be subject to engineering design to ensure they minimise as much as practical the occurrence of scour.	
Mon_054_116_010623	S42/S44	Email	With reference to Volume 2, Chapter 6 Physical Processes, Section 6.8.6Impacts to temperature and salinity stratification due to the presence of infrastructure, the	It was noted that the stratification within the Liverpool Bay is less marked and more transient that that within the estuaries and the baseline	No





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			assessment of stratification is incorrect as it assumes there is only stratification in estuaries, particularly the Dee estuary. The stratification in Liverpool Bay has been shown to reach as far West from the Mersey and Dee as 4 degrees West, can be semi-diurnal in nature (for example see Simpson et al.,(1990)) or can be more enduring in nature (> 1 tidal cycle). As the wind farm structures will be East of 4 degrees West, the wind farm will interact with the stratification. However, the impact is likely to be a positive one, acting to inject further turbulence and break down the stratification.	characterisation, and the baseline environment characterisation and assessment has been updated to reflect the information provided with Volume 2, Chapter 1: Physical processes of the Environmental Statement Marginal stratification with a differential of circa 1.5 PSU may occur during hot or calm conditions and may persist for up to three days during neap tides yet can be mixed away with easily by storms or spring tides.	
Mon_054_122_010623	S42/S44	Email	With reference to Section 1.5.1.3 Impact Assessment, please refer to comments in Section 1.1Physical Processes and Section 1.2Benthic Subtidal and Intertidal Ecology of the current document, around the assessment of impacts on higher sensitivity habitats from landfall works. These concerns, and their solutions, will need to be fed through to the WFD assessment	The WFD assessment has been updated in accordance with the updates made in the Benthic subtidal and intertidal ecology chapter and Physical processes chapter of the Environmental Statement.	No
Mon_054_123_010623	S42/S44	Email	With reference to Section 1.5.1.13Water quality, in the context of the planned works to be undertaken, phytoplankton need to be assessed using information around suspended sediment.	Additional detail and context have been added to the water quality assessment within Volume 6, Annex 2.2: Water Framework Directive Coastal Waters Assessment and Volume 7, Annex 2.4: Water Framework Directive Surface Water and Groundwater Assessment to incorporate potential effects of increased SSC upon phytoplankton.	No
Mon_063_025_020623	S42	Email	Pre-construction monitoring and surveys 5) Aswath bathymetric survey to IHO Order 1a of the area within the Offshore Order Limits extending to an appropriate buffer around the site, must be undertaken. The survey shall include all proposed cable routes. This should fulfil the requirements of MGN654 and its supporting 'Hydrographic Guidelines for Offshore Renewable Energy Developers', which includes the requirement for the full density data and reports to be delivered to the MCA and the UKHO for the update of nautical charts and publications. This must be submitted as soon as possible, and no later than [three months] prior to construction. The Order Limit shapefiles must be submitted to MCA. The Report of Survey must also be sent to the MMO.	Condition 24 requires the undertaker to do a swath-bathymetry survey. Notifications will be provided to NRW under condition 24 of the dML.	No
Mon_066_036_020623	S42	Email	We recommend that a Statement of Common Ground (SoCG) is started by the Applicant early within the EPP, to accurately catalogue all areas of agreement for the project and highlight any areas of disagreement. ETG consultation/agreement logs have been successfully used by other projects as the foundation for the SoCG.	The Applicant will develop Statement of Common Ground with all key stakeholders during the examination phase.	No
Mon_066_037_020623	S42	Email	Best Practice Advice for Offshore Wind Natural England has produced a series of documents to provide Environmental Assessments: Best Practice Advice for Evidence and Data Standards for offshore wind farm development in English inshore and offshore waters. The advice is provided in a series of documents which range from baseline characterisation surveys and pre-application engagement, through to expectations at application and post-consent monitoring.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_038_020623	S42	Email	The project is divided into four phases: Baseline characterisation surveys Pre-application engagement and the evidence plan process Data and evidence expectations at examination Post-consent monitoring and other environmental requirements.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_039_020623	S42	Email	The above link also provides access the Nature Conservation Considerations and Environmental Best Practice for Subsea Cables for English Inshore and UK Offshore Waters. This project provides Natural England and JNCCs joint environmental best practice advice for subsea cable projects in English inshore and UK offshore waters.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_040_020623	S42	Email	It is the expectation that developers follow our Best Practice through the application and consenting process. As such our advice and recommendations to the PEIR are framed around this advice.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No





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Mon_066_041_020623	S42	Email	If you have any issues using SharePoint Online, please contact the site owners or contact: REDACTED	The Applicant notes your response.	No
Mon_066_044_020623	S42	Email	Natural England's Structure/Framework for Attributing Risk. The comments provided within this letter and its Annexes have been colour coded using the structure/framework as specified in the risk table in Appendix I of this letter. In this letter, the coloured headings are coded based on the highest risk associated with the topic in question. Natural England would like to highlight that at this stage all comments highlighted as yellow, amber, or red need to be addressed, with the potential for these issues to become more significant if not resolved at application.	The Applicant notes your response.	No
Mon_066_045_020623	S42	Email	Impacts on the Natural Environment–Natural England's Key Concerns Generic Issues - MARKED RED BASED OFF THEIR APPENDIX Natural England highlights that for several receptors, the PEIR is based on incomplete data (offshore ornithology, marine mammals) or refers to additional data collection that is not presented or still to be carried out (physical processes, benthic ecology). Natural England cannot therefore make any conclusive judgements based on this PEIR, including the cumulative/in-combination assessments and the HRA. Accordingly, our advice focuses on the methodology used. We emphasise the need to base the submitted ES on robust datasets that meet (and where appropriate exceed) minimum standards, for example marine mammal and offshore ornithology impact assessments should be based on at least 24 monthly surveys.	The Environmental Statement has been based on robust datasets that meet/exceed minimum standards. For marine mammals and offshore ornithology assessments, two years of aerial survey data is presented and analysed (Volume 2, Chapter 4: Marine mammals chapter; Volume 2, Chapter 5: Offshore ornithology chapter). The benthic and physical processes assessments have been informed by 2022 and 2023 intertidal surveys, and 2021 and 2022 subtidal benthic surveys (Volume 2, Chapter 1: Physical processes chapter; Volume 2, Chapter 2: Benthic subtidal and intertidal ecology chapter).	
Mon_066_046_020623	S42	Email	We also highlight the risks associated with further data processing to validate the conclusions and having sufficient time to consult pre-application and sufficiently resolve matters prior to submission. We reserve the right to change our comments and position during the ES consultation, subject to the outcome of further data analysis. Furthermore, Natural England seeks confirmation that the timetable set out for DCO submission allows for evidence standards to be met.	Noted. The Applicant confirms that the timetable set out for DCO submission allows for evidence standards to be met.	No
Mon_066_047_020623	S42	Email	Please note that Natural England defer to Natural Resources Wales as the relevant statutory consultee in some instances. This is reflected by the use of a Purple RAG rating in our advice.	The Applicant notes your response.	No
Mon_066_048_020623	S42	Email	Physical Processes, Benthic Ecology and Fish Ecology - MARKED PURPLE BASED OFF THEIR APPENDIX Natural England notes that many of the thematic areas require additional monitoring, surveys and data analysis prior to submission We highlight the risks associated with further data processing to validate the conclusions made in the PEIR. In particular that we are unable to advise on the potential scale and level of risk this project may pose to nature conservation during this consultation. Additionally, it is unclear to Natural England how this project will progress towards submission and ensure there is sufficient time to incorporate the outstanding data which is needed to validate conclusions made in the PEIR, and inform the Environmental Statement (ES).	The Benthic subtidal and intertidal ecology technical report of the Environmental Statement has been updated to include the results of the site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Array Area Zol and the Mona Offshore Cable Corridor, including within Constable Bank and the Menai Strait and Conwy Bay SAC, and the intertidal survey undertaken in 2022 and 2023. The updated Benthic subtidal and intertidal ecology technical report of the Environmental Statement was submitted to the SNCBs via the Benthic Ecology, Fish and Shellfish and Physical Process EWG on 2 October 2023 (i.e. ahead of the final application) for comment. The results of the 2022 and 2023 surveys (i.e. the IEFs identified) have been carried through to, and assessed fully in, the Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	Yes
Mon_069_310_010623	S42	Email	Transboundary impacts screening (Volume 5, annex 5.2) Physical Processes1.6.1.3No transboundary impacts upon physical processes are anticipated. It is proposed that transboundary impacts upon physical processes are screened out of the EIA process.	The Applicant notes your response.	No
Mon_088_026_040623	S42	Email	The developer acknowledges that the project may potentially lead to physical impacts including changes to the tidal, wave, and sediment transport and associated sediment transport pathways. However, the developer proposes that the impacts on receptors, including designated sites, to not be significant.	The Applicant notes your response.	No





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Mon_088_027_040623	S42	Email	However, it has been observed that suspended particulate matter in the wake of OWF infrastructure to be higher than in surrounding waters suggesting increased turbulent mixing and upwelling as a consequence. The impact of which may cause changes in the distribution of heat and salinity, and resuspension of heavily polluted sediments. The WTW acknowledges that the Liverpool Bay area and the North East Irish Sea is subject to significant tidal range, wave environments and the periodic increases in suspended sediment concentration that the benthic ecology is adapted to. However, the increasing anthropogenic disturbance to this benthic ecology is not yet fully understood and the impact should be avoided or mitigated at all costs.	Noted, this observation has been incorporated into Physical Processes assessment. Further detail of impacts to suspended sediment concentrations can be found in Volume 2, Chapter 1: Physical processes chapter; Volume 2, Chapter 2: Benthic subtidal and intertidal ecology chapter. All sediment chemistry data is presented in Volume 6, Chapter 2.1: Benthic subtidal and intertidal ecology technical report of the Environmental Statement. Other chapters and reports summarise and cross-reference this as appropriate. Volume 2, Chapter 2: Benthic subtidal and intertidal ecology cross references the Benthic subtidal and intertidal ecology technical report within the relevant assessments relating to sediment and water quality (i.e. assessment of the potential release of sediment-bound contaminants). The WFD assessment (Volume 6, Chapter 2.2: Water Framework Directive coastal waters assessment) and the physical processes assessment (Volume 2, Chapter 1: Physical processes of the environmental statement) do the same, where water quality aspects and sediment contaminants analysis is presented.	
Mon_153_002_280523	S47	Feedback form	The Irish sea is a beautiful landscape that will be visually impacted by these additional windfarms. The present ones impact of the sea views from the Isle of Man to the Cumbria and Lancashire coastlines. The tidal flow affected by the placement of the turbines could severely impact on the Manx coastline	Volume 2, Chapter 8: Seascape and visual resources chapter of the Environmental Statement presents an assessment of the project on the surrounding seascape. The Physical Processes assessment in Volume 2, Chapter 1: Physical processes chapter assesses the influence of infrastructure on tidal currents using numerical modelling studies.	No

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D.25.8 Benthic subtidal and intertidal ecology table of responses



Table D.25. 8: Benthic subtidal and intertidal ecology table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_020_001_010523	S47	Email	I would like to access the Bathymetry surveys carried out for the Environment Impact Reports by Gardline and XOcean. I believe all surveys are meant to become available through the UKHO Marine Data Portal at some stage; could you either provide a link to them (hopefully in the BAGS file format) or give me an indication of when they may become available? I can confirm that the potential wreck referenced as Mona_0113 is an old wooden sailing ship, very broken up. A H102 report has been made to the UKHO so an official UKHO reference number may be forthcoming in the future.	Volume 2, Annex 9.1: Marine archaeology technical report of the Environmental Statement has been updated to include this information and UKHO data will be reviewed for inclusion of UKHO record number should this be available for application. All relevant survey data will be uploaded to MEDIN and will be available in due course and will be issued to the UKHO in due course.	No
Mon_051_028_310523	S42	Email	Volume 6, Annex 7.1: Benthic subtidal and intertidal ecology technical report Major Comments The PSA sample analysis was carried out by Thomson Environmental Consultants, the PEIR states that the analysis was carried out in accordance with the North-East Atlantic Marine Biological Analytical Quality control, however for the purpose of dredge and disposal these results cannot be considered acceptable to support a marine licence as the consultants are not a validated laboratory for PSA under the MMO guidelines.	The Applicant can confirm that there was an error in the text in Volume 6, Chapter 2.1: Benthic subtidal and intertidal ecology technical report, submitted with the PEIR. The PEIR stated that Thomson Environmental Consultants had undertaken the PSA analysis. This has since been checked with the laboratory and the PSA was subcontracted by Thomson Environmental Consultants to Ocean Ecology. Ocean Ecology are a laboratory validated by MMO for sediment analysis to inform marine licence applications.	No
Mon_051_029_310523	S42	Email	The MMO note that the report states that samples were collected from 51 stations, however the results tables within the PEIR do not show the full 51 samples analysis results (14 samples for polychlorinated biphenyls (PCB), 22 for metals, and 23 samples for polycyclic aromatic hydrocarbons (PAH), none for organotins). The MMO recommends clarification of why only a subset of samples are presented in the report be included.	A total of 51 stations were sampled in the Mona Array Area in the 2021 survey as reported in the PEIR), however, as per the survey scope agreed with the SNCBs, not every station was sampled for sediment chemistry. A total of 14 sediment chemistry samples were collected in the Mona Array Area during the 2021 survey. There were some inconsistencies with how this was reported in the Benthic subtidal and intertidal ecology technical report submitted with the PEIR and some stations with the Morgan Offshore Wind Project Generation Assets: had been included in error. The Benthic subtidal and intertidal ecology technical report has been updated to correct these inconsistencies and to also include the results of the additional sediment chemistry sampling undertaken within the Mona Array Area Zol and the Mona Offshore Cable Corridor.	
Mon_051_030_310523	S42	Email	Section 1.7.2.9 states that "Levels of PCBs, for all samples, were found to be under the respective Cefas Action Levels (AL). Almost all samples were also below the limit of detection except sample stations ENV05 and ENV40". However, there are currently no action levels for individual PCBs, nor an Action Level 2for the sum of ICES7. Additionally, the sample referenced ENV05 is not listed with in this Appendix. The MMO would require the full set of samples in order to determine if action levels are met.	The Applicant notes that there were inconsistencies in the reporting of the sediment chemistry data for the PEIR which have been corrected for the final application. The results of total PCBs (compared to the Cefas AL1 and AL2 and the Canadian TEL/PEL thresholds) and total ICES-7 PCBs (compared to the Cefas AL1 threshold) are presented in Table 1.7 of the Benthic subtidal and intertidal ecology technical report submitted with the final application. The full PCB results per station are also presented in Appendix F of the Benthic subtidal and intertidal ecology technical report.	No
Mon_051_031_310523	S42	Email	The MMO recommends the document be updated to include the full set of samples taken, a clarification as to why only some of the samples have been analysed, and a justification for why the samples were tested for such contaminants.	The Benthic subtidal and intertidal ecology technical report has been updated to include the full set of sediment chemistry data for the Mona Array Area and ZoI and the Mona Offshore Cable Corridor. As per the benthic subtidal survey scopes agreed with the SNCBs, sediment chemistry analysis was not undertaken at every grab station sampled but all those stations sampled are now fully reported.	No
Mon_051_032_310523	S42	Email	Due to the sediment chemistry results being insufficient (as per the above comments) the MMO would suggest mitigations be added to reduce the risk of any areas containing high contamination results. Some suggested mitigations are using an appropriate dredger; removing the sediment to a land-based disposal site; or, implementing an exclusion zone for dredging around these areas.	The Applicant notes that there were inconsistencies in the reporting of the sediment chemistry data for the PEIR which have been corrected for the final application. This demonstrates that, overall, levels of contamination are low across the Mona Offshore Wind Project and do	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				not pose a risk to benthic ecology. No mitigation is therefore deemed to be necessary.	
Mon_051_037_310523	S42	Email	Minor Comments 9.2. The sediment and water quality information is presented across multiple sections of the report. The MMO would recommend that sediment contamination and quality be presented within one water and sediment quality section.	All sediment chemistry data is presented in Volume 6, Chapter 2.1: Benthic subtidal and intertidal ecology technical report of the Environmental Statement. Other chapters and reports summarise and cross-reference this as appropriate. Volume 2, Chapter 2: Benthic subtidal and intertidal ecology cross references the Benthic subtidal and intertidal ecology technical report within the relevant assessments relating to sediment and water quality (i.e. assessment of the potential release of sediment-bound contaminants). The WFD assessment (Volume 6, Chapter 2.2: Water Framework Directive coastal waters assessment) and the physical processes assessment (Volume 2, Chapter 1: Physical processes of the environmental statement) do the same, where water quality aspects and sediment contaminants analysis is presented.	No
Mon_054_003_010623	S42/S44	Email	Benthic Subtidal and Intertidal Ecology: NRW (A)defer comments on the Mona array to JNCC. With regards to the export cable route some impacts have not been assessed, and NRW (A) can not agree with the conclusions of various assessments that have been undertaken, due to the methodologies used, or lack of information provided. We provide advice on the further work necessary.	Comment noted and the Applicant's responses are provided against the detailed responses provided by NRW.	No
Mon_054_004_010623	S42/S44	Email	Marine Water and Sediment Quality and Marine WFD: NRW (A) have concerns regarding the conclusions of several assessments. We provide advice on how to resolve these along with other corrections or clarifications required.	Comment noted and the Applicant's responses are provided against the detailed responses provided by NRW.	No
Mon_054_029_010623	S42/S44	Email	Cable installation to landfall Horizontal Directional Drilling (HDD)—no assessment has been carried out to determine the impacts caused by the HDD option for cable connection to landfall. There is the potential for bentonite clay to be released and advected from the drilling location potentially much further than the coarser intertidal seabed sediments. Exit pits located in the intertidal may also require cable protection, which could then interrupt the longshore sediment transport processes and reduce the sediment supply down coast, potentially leading to coastal erosion.	Since the submission of the PEIR, open cut trenching has been removed from the project design and all export cables at the landfall will be installed via trenchless techniques, meaning that no cable protection will be required above seabed level in the intertidal area. An assessment of the potential release of bentonite during trenchless techniques has been added to the assessment of increased suspended sediment concentrations and sediment deposition on benthic receptors in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology.	Yes
Mon_054_056_010623	S42/S44	Email	Benthic Subtidal and Intertidal Ecology 1.2.1 Key Issues. Potential impacts to the different habitats present along the export cable route (ECR) have not been assessed with the exception of the section of the ECR that crosses Constable Bank, the Menai Strait and Conwy Bay SAC and the intertidal cable landfall. For Constable Bank and the Menai Strait and Conwy Bay SAC survey data is not yet available.	The Benthic subtidal and intertidal ecology technical report of the Environmental Statemen has been updated to include the results of the site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Offshore Cable Corridor, including within Constable Bank and the Menai Strait and Conwy Bay SAC. The results of these surveys (i.e. the IEFs identified) have been carried through to and assessed fully in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	No
Mon_054_057_010623	S42/S44	Email	Information on the location of the cable protection along the export cable route has not been presented and it is therefore not possible to assess some potential impacts.	Cable protection will only be used where sufficient trenching depths cannot be achieved. There is a commitment not to place any cable protection in Constable Bank (an Annex 1 habitat outside of a designated site), to minimize cable protection within the Menai Straights and Conwy Bay SAC, and to use trenchless techniques at the landfall so no cable installation will be required in the intertidal area above seabed level. In nearshore areas the use of cable protection will be minimised. Further detail on cable protection measures can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement.	Yes
Mon_054_058_010623	S42/S44	Email	Potential impacts from open-cut trenching to intertidal habitats have not been appropriately assessed.	Since the submission of the PEIR, open cut trenching has been removed from the PDE and all export cables at the landfall will be installed via trenchless techniques. Furthermore, the Applicant is	Yes





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				committed to ensuring that all construction activities at the Mona landfall associated with the trenchless techniques works will be located outside the clay with piddocks IEF. These measures which has been adopted as part of the Mona Offshore Wind Project will ensure that direct impacts (e.g. habitat loss or disturbance) to the ecologically sensitive and nationally protected clay with piddocks IEF will not occur.	
Mon_054_059_010623	S42/S44	Email	Potential impacts from increases in suspended sediment concentrations to the Menai Strait and Conwy Bay SAC, the Sabellaria alveolata reef and the Mytilus edulis beds have not been appropriately assessed.	The assessment of increased SSC and sediment deposition in section 2.9.2 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology chapter of the Environmental Statement has been updated to include further detail regarding the predicted nature of extent of plumes resulting from export cable installation in the Menai Strait and Conwy Bay SAC and noting that sandwave clearance has been removed from the PDE for the SAC. Due to the nature of the tidal flow, mobilised sediment is carried offshore and will not accumulate along the coastline (including the coastline within the SAC). Since the submission of the PEIR, the boundary of the Mona Offshore Cable Corridor and Access Area has been amended, to exclude the Sabellaria alveolata reef and Mytilus edulis bed at the landfall. The Sabellaria alveolata reef is now located more than 250 m to the west of the intertidal part of the Mona Offshore Cable Corridor and Access Area. Furthermore, since the submission of the PEIR, open cut trenching has been removed from the PDE and all export cables at the landfall will be installed via trenchless techniques. There will therefore be no SSC arising from trenching in the intertidal to impact on the S. alveolata reef. An assessment of the impacts of trenching in the subtidal on receptors at the landfall is included in section 2.9.2 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and this has been updated to include further detail regarding the predicted nature of extent of plumes resulting from subtidal export cable installation near the landfall. Significant effects on the S. alveolata, Mytilus bed and clay with piddocks IEFs are not predicted.	
Mon_054_060_010623	S42/S44	Email	NRW(A) are unable to agree with the conclusion that the long-term habitat loss resulting from the placement of cable protection in Constable Bank will be minor adverse	As outlined in Table 2.18 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement the Mona Offshore Wind Project has committed to no cable protection within Constable Bank. There will therefore be no long term habitat loss to this feature.	Yes
Mon_054_061_010623	S42/S44	Email	NRW(A) are unable to agree with the conclusion that the long-term habitat loss from cable trenching to the Peat and clay exposures habitat will be minor adverse.	Since the submission of the PEIR, open cut trenching has been removed from the PDE and all export cables at the landfall will be installed via trenchless techniques. Furthermore, the Applicant is committed to ensuring that all construction activities at the Mona landfall associated with the trenchless techniques works will be located outside the clay with piddocks IEF. These measures which has been adopted as part of the Mona Offshore Wind Project will ensure that direct impacts (e.g. habitat loss or disturbance) to the ecologically sensitive and nationally protected clay with piddocks IEF will not occur.	
Mon_054_062_010623	S42/S44	Email	The potential impacts from trenchless techniques i.e. Horizontal Directional Drilling (HDD) in the intertidal have not been assessed, in particular requirement for cable protection in the exit pits	Since the submission of the PEIR, open cut trenching has been removed from the PDE and all export cables at the landfall will be installed via trenchless techniques. An assessment of the release of bentonite during trenchless techniques has been added to the assessment of increased SSC and sediment deposition on benthic receptors. The Applicant can confirm that no cable protection will be installed on the surface in the intertidal.	





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Mon_054_063_010623	S42/S44	Email	Further information is required to understand the potential for cable protection to become exposed in the intertidal.	The Cable Specification and Installation Plan will outline measures such as appropriate cable trenching depths to minimise cable exposure and stranded assets. No above seabed level cable protection required in the intertidal area as trenchless techniques will be used at the landfall. More detail can be found in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	Yes
Mon_054_064_010623	S42/S44	Email	NRW(A) are unable to agree with the conclusion that the long-term habitat loss resulting from the placement of cable protection in the Menai Strait and Conwy Bay SAC will be minor adverse until the site specific survey data is presented.	The Benthic subtidal and intertidal ecology technical report of the Environmental Statement has been updated to include the results of the site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Offshore Cable Corridor, including within Constable Bank and the Menai Strait and Conwy Bay SAC. The results of these surveys have demonstrated that there are no designated features of the SAC present in the small area of overlap with the Mona Offshore Cable Corridor. Therefore, there will be no long term habitat loss to any of the features of the SAC. Furthermore, the refinements to the PDE since PEIR have resulted in a reduction in the extent of cables requiring cable protection within the SAC from 2,800 m in the PEIR to 800 m for the final application resulting in the long term loss of 8,000 m2 of non-designated habitats in the SAC, which represents 0.003% of the total area of the SAC.	Yes
Mon_054_065_010623	S42/S44	Email	Further assessments are required to understand the potential impacts to physical processes from the placement of cable protection on Constable bank and the Menai Strait and Conwy Bay SAC.	As outlined in Volume 2, Chapter 1: Physical processes of the Environmental Statement, cable protection is included within the supporting studies and impacts on physical processes and is included in Volume 6, Annex 1.1: Physical processes technical report of the Environmental Statement. The results of the relevant physical processes assessments have been brought through to the assessments in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement. Cable protection will only be used where sufficient trenching depths cannot be achieved. There is a commitment not to place any cable protection in Constable Bank (an Annex 1 habitat outside of a designated site), to minimize cable protection within the Menai Straights and Conwy Bay SAC, and to use trenchless techniques at the landfall so no cable installation will be required in the intertidal area above seabed level. In nearshore areas the use of cable protection will be minimised. Further detail on cable protection measures can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement.	Yes
Mon_054_066_010623	S42/S44	Email	Detailed Comments1.2.2.1Volume 1, Chapter 3Project Description With reference to Section 3.6.8.23Scour protection for foundations, NRW (A) advise that the rock used is as similar as possible to that which would naturally occur in the area. Regarding the use of frond mattresses, whilst the principle of fronds accreting sediment is generally beneficial, NRW (A) advise that polypropylene frond mattresses are not used due to the potential for the release of microplastics directly into the benthic environment.	The Applicant will use rock that is similar to the rock that occurs naturally in the area. A range of cable protection is under consideration. The final design will be selected post consent in consultation with stakeholders. Further information can be found in Volume 1, Chapter 3: Project Description of the Environmental Statement.	Yes
Mon_054_067_010623	S42/S44	Email	With reference to Section 3.6.14.3 Intertidal Area, Overview, NRW (A) strongly encourages the applicant to use Horizontal Directional Drilling (HDD) where possible given the potential environmental impacts of open cut trenching on sensitive features found during the intertidal survey. Clarification is sought on whether further geophysical survey data will be available prior to submission of the full ES to understand whether HDD is feasible.	Since the submission of the PEIR, open cut trenching has been removed from the PDE and all export cables at the landfall will be installed via trenchless techniques. Furthermore, the Applicant is committed to ensuring that all construction activities at the Mona landfall associated with the trenchless techniques works will be located outside the clay with piddocks IEF. These measures which have been adopted as part of the Mona Offshore Wind Project will ensure that direct impacts (e.g. habitat loss or disturbance) to the ecologically sensitive and nationally protected clay with piddocks IEF will not occur.	



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Mon_054_068_010623	S42/S44	Email	Volume 2, Chapter 7Benthic Subtidal and Intertidal Ecology With reference to Section 7.1.3.1Study Area, the potential impacts to the different habitats present along the export cable route (ECR) have not been assessed with the exception of the section of the ECR that crosses Constable Bank, the Menai Strait and Conwy Bay SAC and the intertidal cable landfall. NRW (A)assume these assessments have not been carried out because the specific survey data was not available at the time of writing the PEIR. We are therefore unable to appropriately comment on what the impacts to benthic habitats along the export cable route from the development are	The Benthic subtidal and intertidal ecology technical report of the Environmental Statement has been updated to include the results of the site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Offshore Cable Corridor, including within Constable Bank and the Menai Strait and Conwy Bay SAC. The results of these surveys (i.e. the IEFs identified) have been carried through to, and assessed fully in, the Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	No
Mon_054_069_010623	S42/S44	Email	Furthermore, no indication of where the cable protection will be placed along the export cable route has been presented. Cable protection placed before and/or after mobile features such as Constable Bank could have an impact on the form and function of the sandbank and thus have an indirect impact on benthic communities. NRW (A)are therefore unable to appropriately assess the potential impacts to benthic habitats even for those sections of the ECR that have been assessed in the PEIR (Constable Bank and the Menai Strait and Conwy Bay SAC) as this information has not been presented.	As outlined in Table 2.18 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement the Mona Offshore Wind Project has committed to no cable protection within Constable Bank. There will therefore be no long term habitat loss to this feature. The Benthic subtidal and intertidal ecology technical report of the Environmental Statement has been updated to include the results of the site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Offshore Cable Corridor, including within Constable Bank and the Menai Strait and Conwy Bay SAC. The results of these surveys have demonstrated that there are no designated features of the SAC present in the small area of overlap with the Mona Offshore Cable Corridor. Therefore, there will be no long term habitat loss to any of the features of the SAC.	No
Mon_054_070_010623	S42/S44	Email	With reference to Section 7.4.6.4 Designated Sites, it would be useful to overlap the project specific outputs of the physical processes assessment with the Annex I features of the Menai Strait and Conwy Bay SAC in order to see the spatial extent of the physical processes impacts in the SAC. Without this, it is difficult to determine the potential for any interaction with other features of the SAC, for example, the Annex I Submerged or partially submerged sea caves feature, to justify their being screened out of the assessment	The modelled output presented in Volume 6, Annex 1.1: Physical processes technical report of the Environmental Statement includes scale bars and the applicable designated areas to aid in the interpretation of findings. The appropriate text relating to the modelled outputs and the Menai Straights and Conwy Bay SAC has been incorporated into Volume 2, Chapter 2: Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	No
Mon_054_071_010623	S42/S44	Email	In Table 7.16 Measures adopted as part of the Mona Offshore Wind Project, NRW (A) request clarification as to what mitigation measures are being proposed to minimise potential impacts to Peat and Clay exposures (Section 7 habitat) protected under the Environment (Wales) Act 2016.	Since the submission of the PEIR, open cut trenching has been removed from the PDE and all export cables at the landfall will be installed via trenchless techniques. Furthermore, the Applicant is committed to ensuring that all construction activities at the Mona landfall associated with the trenchless techniques works will be located outside the clay with piddocks IEF. These measures which have been adopted as part of the Mona Offshore Wind Project will ensure that direct impacts (e.g. habitat loss or disturbance) to the ecologically sensitive and nationally protected clay with piddocks IEF will not occur.	Yes
Mon_054_072_010623	S42/S44	Email	In Table 7.16 Measures adopted as part of the Mona Offshore Wind Project, NRW(A) note that a 50m exclusion buffer from the edge of the reef will be proposed to avoid potential impacts to the <i>Sabellaria alveolata</i> reef. This buffer would mitigate for any direct damage to the reef from construction, but does not take into account any potential indirect impacts from increases in Suspended Sediment Concentration (SSC)as a result of the trenching works. Furthermore a walk-over survey might be required closer to the time of construction to map the extent of <i>S.alveolata</i> , particularly if a long time has elapsed since the time of the survey and the start of construction. Similarly, NRW(A) encourage the applicant to avoid any direct impacts to the <i>Mytilus edulis</i> beds via establishing an exclusion buffer, in accordance with what has been proposed for the <i>S. alveolate</i> reef–please refer to Paragraph 50of the current document regarding <i>M. edulis</i>	Since the submission of the PEIR, the boundary of the Mona Offshore Cable Corridor and Access Area has been amended, to exclude the <i>Sabellaria alveolata</i> reef and Mytilus edulis bed at the landfall. The <i>S. alveolata</i> reef is now located more than 250 m to the west of the intertidal part of the Mona Offshore Cable Corridor and Access Area. Furthermore, since the submission of the PEIR, open cut trenching has been removed from the PDE and all export cables at the landfall will be installed via trenchless techniques. There will therefore be no SSC arising from trenching in the intertidal to impact on the <i>S. alveolata</i> reef. As assessment of the impacts of trenching in the subtidal on receptors at the landfall is included in section 2.9.2 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and this has been updated to include further detail regarding the predicted nature of extent of plumes resulting from subtidal export cable installation near the landfall.	





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				NRW's comments regarding additional survey of the reef are noted, however, the Applicant revisited the reef during the 2022 Phase 1 intertidal infill survey and found no significant change in the extent of the reef since the previous year other than some degradation of the eastern edge. Together with the fact that the boundary of the Mona Offshore Cable Corridor and Access Area has been amended, to exclude the Sabellaria alveolata reef, the Applicant is therefore confident that there will be no direct impacts to the S. alveolata reef or the Mytilus bed.	
Mon_054_073_010623	S42/S44	Email	In line with our advice provided through the Expert Working Group (EWG), NRW (A) strongly encourages the applicant not to place any cable protection on Constable Bank and/or the Menai Strait and Conwy Bay SAC. We note in Table 7.16 Measures adopted as part of the Mona Offshore Wind Project, that the applicant is committed to investigating opportunities to limit the extent of cable protection in these areas and that the data gathered via the Summer 2022 survey should help inform this.	As outlined in Table 2.18 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement the Mona Offshore Wind Project has committed to no cable protection within Constable Bank. There will therefore be no long term habitat loss to this feature. The Benthic subtidal and intertidal ecology technical report of the Environmental Statement has been updated to include the results of the site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Offshore Cable Corridor, including within Constable Bank and the Menai Strait and Conwy Bay SAC. The results of these surveys have demonstrated that there are no designated features of the SAC present in the small area of overlap with the Mona Offshore Cable Corridor. Therefore, there will be no long term habitat loss to any of the features of the SAC.	No
Mon_054_074_010623	S42/S44	Email	As part of the actions to minimise the introduction and/or spread of Invasive Non-Native Species (INNS)noted in Table 7.16 Measures adopted as part of the Mona Offshore Wind Project, NRW (A) advise that a full Biosecurity Risk Assessment and INNS Management Plan are completed in relation to all marine operation activities associated with the current proposal. The risk assessment and management plan should include consideration of all activities, vehicles and equipment used as well as how the risk will be minimised through appropriate mitigation and adherence to best practice guidance and management measures. The risk assessment should include a review of all the available data in relation to the presence of marine INNS where applicable to the current proposal, and the potential risks associated with each species identified.	Response noted. A Biodiversity Risk Assessment and INNS Management Plan will be included within the Environmental Management Plan.	No
Mon_054_075_010623	S42/S44	Email	With reference to Section 7.8.1 Temporary habitat loss/disturbance, NRW (A) agree that as the sediment will be deposited close to its original location, it is likely that it will be similar to the seabed sediment increasing the potential for survival and recolonisation of benthic species. However, recovery of benthic habitats within Constable Bank will depend in part on the impacts to the physical processes of the sandbank, which have not been assessed–please refer to Section 1.1Physical Processes of the current document. NRW (A) are unable to agree with the conclusions until this assessment has been carried out.	As outlined in Table 2.18 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement the Mona Offshore Wind Project has committed to no sandwave clearance within Constable Bank. The assessments presented in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement have been updated accordingly and assessments provided for the impact of cable installation on habitats in Constable Bank.	Yes
Mon_054_076_010623	S42/S44	Email	With reference to Section 7.8.1.29-30 and 32Intertidal habitat IEFs (Important Ecological Features), NRW(A) are concerned that the potential impacts from open-cut trenching to intertidal habitats (<i>Verrucaria maura</i> IEF, the Littoral and eulittoral rock dominated by epifaunal communities IEF and the littoral sand and muddy sand supporting infaunal communities IEF) have not been appropriately assessed in the PEIR. The assessment outlined assumes that the impacts from open-cut trenching will be temporary, resulting in temporary habitat loss and/or disturbance as the trench will be infilled. This might be the case if the trench is created via ploughing, where the machine simultaneously closes the trench whilst laying the cable. However, if the trench is opened as a separate activity and subsequently infilled with different sediment/material for example cable mattressing (see Paragraph 71below) and/or left open to be naturally infilled, it is possible that the habitats might not recover and/or take a very long time to recover, potentially resulting in long-term habitat loss. Further information is required to understand exactly what the methodology for the open-cut trenching is and how the applicant is planning to infill the trench in the	Since the submission of the PEIR, open cut trenching has been removed from the PDE and all export cables at the landfall will be installed via trenchless techniques. This measure which has been adopted as part of the Mona Offshore Wind Project will ensure that direct impacts (e.g. temporary habitat disturbance) to intertidal habitat IEFs will be minimised and will be limited to trenchless techniques working areas and machinery, vehicle and personnel movements. Furthermore, the Applicant is committed to ensuring that all construction activities at the Mona landfall associated with the trenchless techniques works will be located outside the clay with piddocks IEF. These measures which have been adopted as part of the Mona Offshore Wind Project will ensure that direct impacts (e.g. habitat loss or disturbance) to the ecologically sensitive and nationally protected clay with piddocks IEF will not occur.	Yes





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			intertidal (including with what material). This is important to understand whether the impacts to intertidal habitats are temporary.		
Mon_054_077_010623	S42/S44	Email	With reference to Section 7.8.1.34Intertidal habitat IEFs, as previously noted in Paragraph 45, NRW (A) advise a 50m exclusion buffer is also set around the Mytilus edulis beds inline with the buffer that has been proposed for the <i>Sabellaria alveolata</i> reef. This buffer will prevent any direct damage to these sensitive features from the cable installation works, although it does not account for any indirect impacts from smothering. NRW (A) are concerned that the large amounts of sediment that will be mobilised during the cable trenching works over the course of 33 months will advect towards the M. edulis beds and the <i>S. alveolata</i> reef resulting in significant smothering to these habitats. NRW (A) request clarification on how far the cable trenches are from these features and what evidence there is from the physical processes modelling, to support the conclusions that the movement of sediment in the intertidal from the cable trenching installation works will not significantly impact the <i>M. edulis</i> beds and the <i>S. alveolata</i> reef	Since the submission of the PEIR, the boundary of the Mona Offshore Cable Corridor and Access Area has been amended, to exclude the <i>Sabellaria alveolata</i> reef and Mytilus edulis bed at the landfall. The <i>S. alveolata</i> reef is now located more than 250 m to the west of the intertidal part of the Mona Offshore Cable Corridor and Access Area. Furthermore, since the submission of the PEIR, open cut trenching has been removed from the project design and all export cables at the landfall will be installed via trenchless techniques. There will therefore be no SSC arising from trenching in the intertidal to impact on the <i>S. alveolata</i> reef. An assessment of the impacts of trenching in the subtidal on receptors at the landfall is included in section 2.9.2 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and this has been updated to include further detail regarding the predicted nature of extent of plumes resulting from subtidal export cable installation near the landfall. Significant effects on the <i>S. alveolata</i> and Mytilus bed are not predicted.	Yes
Mon_054_078_010623	S42/S44	Email	With reference to Section 7.8.1.36Intertidal habitat IEFs, NRW (A) advise that the sensitivity of littoral sand and muddy sand supporting infaunal communities IEF to temporary habitat loss/disturbance, should be considered 'medium' in line with the information presented in Section 7.8.1.30, which notes the IEF has a medium sensitivity to habitat structure change.	The sensitivity of littoral sand and muddy sand supporting infaunal communities IEF has been amended to medium in section 2.9 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement as suggested by NRW.	No
Mon_054_079_010623	S42/S44	Email	With reference to Section 7.8.1.36Intertidal habitat IEFs, the sublittoral very soft chalk or clay with piddocks IEF is characterised by specific abiotic and biotic features that would be adversely affected by open cut trenching, resulting in long-term habitat loss (as noted in Section 7.8.1.31). Clarification is therefore sought as to why it is being assessed as temporary habitat disturbance/loss here.	Since the submission of the PEIR, open cut trenching has been removed from the project design and all export cables at the landfall will be installed via trenchless techniques. Furthermore, the Applicant is committed to ensuring that all construction activities at the Mona landfall associated with the trenchless techniques works will be located outside the clay with piddocks IEF. These measures which have been adopted as part of the Mona Offshore Wind Project will ensure that direct impacts (e.g. habitat loss or disturbance) to the ecologically sensitive and nationally protected clay with piddocks IEF will not occur.	Yes
Mon_054_080_010623	S42/S44	Email	With reference to Section 7.8.1.54Y Fenaia Bae Conwy/Menai Strait and Conwy Bay SAC, repeated placement of anchors and jack-up vessel legs in Annex I Reefs could potentially result in permanent damage to the feature. Furthermore, deposition of high levels of sediment as a result of the sandwave clearance works on the Annex I Reef feature could also result in smothering and potentially long-term habitat loss depending on the recovery rate of the habitat and/or species (see Section 7.8.1.41for example on <i>Hiatella arctica</i>). As such, NRW (A) are unable to agree with the conclusions until the results from the ECR benthic survey are presented in order to understand the habitats that could be impacted in the Menai Strait and Conwy Bay SAC and their distribution.	The Volume 6, chapter 2.1: Benthic subtidal and intertidal ecology technical report of the Environmental Statement has been updated to include the results of the site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Offshore Cable Corridor, including within Constable Bank and the Menai Strait and Conwy Bay SAC. The results of these surveys have demonstrated that there are no designated features of the SAC present in the small area of overlap with the Mona Offshore Cable Corridor. The Benthic subtidal and intertidal ecology technical report, Volume 2, chapter 2: benthic subtidal and intertidal ecology chapter, Volume 2, chapter 1: physical processes chapter and the HRA Stage 2 ISAA Part 2 (SAC assessments) all assess the potential impact of smothering and habitat loss to the features of the Menai Strait and Conwy Bay SAC, and conclude there will be no significant impact due to the distance of the features from the works. As outlined in Table 2.18 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement the Mona Offshore Wind Project has committed to no sandwave clearance within the SAC, and limited cable protection, and the assessments have been updated accordingly.	Yes



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Mon_054_081_010623	S42/S44	Email	With reference to Section 7.8.2.15-16Intertidal habitat IEFs, NRW(A) note in Volume 6, Annex 6.1: Physical processes technical report, Figures1.166 and 1.168 Suspended sediment concentration ebb –offshore export cables in the intertidal area installation, that the suspended sediment plume created during the intertidal cable trenching could potentially reach the <i>S.alveolata</i> reef in high concentrations during the ebb tide. NRW (A) are therefore unable to agree that the impact to the S. alveolate reef from potential increases in SSC will be of negligible magnitude until further evidence is provided to support these conclusions. This should include a figure overlaying the extent of the sediment plume against the mapped habitat and figures on the potential amount of sediment deposition on the reef. Please also refer to Section 1.1Physical Processes of the current document and note that this comment also applies to potential impacts to the <i>M. edulis</i> beds and the sublittoral very soft chalk or clay with piddocks IEF.	Since the submission of the PEIR, the boundary of the Mona Offshore Cable Corridor and Access Area has been amended, to exclude the <i>Sabellaria alveolata</i> reef and Mytilus edulis bed at the landfall. The <i>S. alveolata</i> reef is now located more than 250 m to the west of the intertidal part of the Mona Offshore Cable Corridor and Access Area. Furthermore, since the submission of the PEIR, open cut trenching has been removed from the PDE and all export cables at the landfall will be installed via trenchless techniques. There will therefore be no SSC arising from trenching in the intertidal to impact on the <i>S. alveolata</i> reef. An assessment of the impacts of trenching in the subtidal on receptors at the landfall is included in section 2.9.2 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology chapter of the Environmental Statement, and this has been updated to include further detail regarding the predicted nature of extent of plumes resulting from subtidal export cable installation near the landfall. Significant effects on the <i>S. alveolata</i> , Mytilus bed and clay with piddocks IEFs are not predicted.	Yes
Mon_054_082_010623	S42/S44	Email	With reference to Section 7.8.2.17-20Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC, no spatial figures have been presented to understand the extent of the sediment plume and potential interactions with Annex I features of the Menai Strait and Conwy Bay SAC (please also refer to Section 1.1Physical Processes of the current document). Furthermore, until the results of the export cable route survey are presented, NRW (A)are unable to assess whether there are any potentially sensitive habitats that would be impacted by the plume and are therefore unable to agree with the conclusions at this stage.	The modelled output presented in Volume 6, Annex 1.1: Physical processes technical report of the Environmental Statement includes scale bars and the applicable designated areas to aid in the interpretation of findings. The appropriate text relating to the modelled outputs and the SAC has been incorporated into the Benthic subtidal and intertidal ecology chapter of the Environmental Statement. The Benthic subtidal and intertidal ecology technical report of the Environmental Statement has been updated to include the results of the site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Offshore Cable Corridor, including within Constable Bank and the Menai Strait and Conwy Bay SAC. The results of these surveys have demonstrated that there are no designated features of the SAC present in the small area of overlap with the Mona Offshore Cable Corridor.	No
Mon_054_083_010623	S42/S44	Email	NRW (A) advise with reference to Section 7.8.2.44Y Fenaia Bae Conwy/Menai Strait and Conwy Bay SAC, that the sensitivity of the Annex I subtidal reef IEF, in particular the biotope Hiatella-bored vertical sublittoral limestone rock (CR.MCR.SfR.Hiato),to increases in suspended sediment concentrations and associated deposition should be assessed as medium, in line with the information presented in the Marine Evidence based Sensitivity Assessment (MarESA–medium sensitivity to smothering and siltation rate changes (light))	The sensitivity of the CR.MCR.SfR.Hia biotope has been amended in section 2.9 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement as suggested by NRW.	No
Mon_054_084_010623	S42/S44	Email	With reference to Section 7.8.3 Disturbance/remobilisation of sediment-bound contaminants, please refer to Paragraph 54of the current document regarding the potential impact of the suspended sediment plume.	Since the submission of the PEIR, the boundary of the Mona Offshore Cable Corridor and Access Area has been amended, to exclude the <i>Sabellaria alveolata</i> reef and Mytilus edulis bed at the landfall. The <i>S. alveolata</i> reef is now located more than 250 m to the west of the intertidal part of the Mona Offshore Cable Corridor and Access Area. Furthermore, since the submission of the PEIR, open cut trenching has been removed from the project design and all export cables at the landfall will be installed via trenchless techniques. There will therefore be no SSC arising from trenching in the intertidal to impact on the <i>S. alveolata</i> reef. An assessment of the impacts of trenching in the subtidal on receptors at the landfall is included in section 2.9.2 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and this has been updated to include further detail regarding the predicted nature of extent of plumes resulting from subtidal export cable installation near the landfall. Significant effects on the <i>S. alveolata</i> , Mytilus bed and clay with piddocks IEFs are not predicted.	Yes





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				These updates are also reflected in the assessment of disturbance/remobilisation of sediment-bound contaminants.	
Mon_054_085_010623	S42/S44	Email	With reference to Section 7.8.4.8Long term habitat loss (Constable Bank), NRW (A) disagree that the magnitude of impact is low, as stated, the impact is predicted to be of long term duration, continuous and non-reversible. Furthermore the area lost is large: 39,440m2. We understand there is a commitment to investigate opportunities to limit the extent of cable protection within Constable bank once the site-specific geophysical data is available, but at this point we have to base our assessment on the information that has been presented in the PEIR. NRW (A) therefore advise that the magnitude of impact should be considered High based on the scale of the impact and that it is of long-term duration and non-reversible. As such, based on the sensitivity of the receptor and the magnitude of impact (High), the permanent habitat loss to Constable Bank will be of Major adverse significance, which is significant in EIA terms. Further understanding of the extent of cable protection required once the site-specific geophysical data is available, will help determine whether the potential impact could be reduced	As outlined in Table 2.18 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement the Mona Offshore Wind Project has committed to no cable protection within Constable Bank. There will therefore be no long term habitat loss to this feature.	Yes
Mon_054_086_010623	S42/S44	Email	With reference to Section 7.8.4.9Long term habitat loss (Peat and clay exposures), NRW (A) disagree that the magnitude of impact is low as the impact is predicted to be of long-term duration, continuous and non-reversible. The report notes only a very small proportion (2,040m2) of the sublittoral soft clay could be affected by the long-term habitat loss. However, Section 1.8.3.25 of Volume 6, Annex 7.1: Benthic subtidal and intertidal ecology technical report notes that the clay covers 3,634m2of the lower shore. This would result in approximately 56% of the Piddocks with a sparse associated fauna in sublittoral very soft chalk or clay (CR.MCR.SfR.Pid) –a Section 7 habitat listed under the Environment (Wales) Act 2016–being permanently lost.	Since the submission of the PEIR, open cut trenching has been removed from the project design and all export cables at the landfall will be installed via trenchless techniques. Furthermore, the Applicant is committed to ensuring that all construction activities at the Mona landfall associated with the trenchless techniques works will be located outside the clay with piddocks IEF. These measures which have been adopted as part of the Mona Offshore Wind Project will ensure that direct impacts (e.g. habitat loss or disturbance) to the ecologically sensitive and nationally protected clay with piddocks IEF will not occur.	Yes
Mon_054_087_010623	S42/S44	Email	NRW (A) therefore advise that the magnitude of impact should be considered high based on the scale of the impact and that it is of long term-duration and non-reversible. Based on the matrices presented in Table7.12 Definition of terms relating to the sensitivity of the receptor, we advise that the sensitivity of this receptor to habitat loss impacts would fall under the 'very high' category. This is because the habitat is of national importance with high vulnerability and no ability to recover. For it to fall under the 'high' sensitivity category it would mean there is 'low recoverability'. The Assessing Welsh Fishing Activities (AWFA) assessment proforma (Beam trawl on peat and clay exposures (gov.wales)) which assesses the impact to this habitat from beam trawling, describes the habitat and its associated species as fragile and easily damaged by one pass of a beam trawl. The irreplaceable nature of the peat and clay exposures means that if erosion occurs to the habitat substrate by repeated passes of the beam trawl gear, then recovery will not occur. The impact from cable trenching is likely to be much greater than that from beam trawl gear, emphasising that recovery in this habitat will not occur.	Since the submission of the PEIR, open cut trenching has been removed from the project design and all export cables at the landfall will be installed via trenchless techniques. Furthermore, the Applicant is committed to ensuring that all construction activities at the Mona landfall associated with the trenchless techniques works will be located outside the clay with piddocks IEF. These measures which have been adopted as part of the Mona Offshore Wind Project will ensure that direct impacts (e.g. habitat loss or disturbance) to the ecologically sensitive and nationally protected clay with piddocks IEF will not occur.	Yes
Mon_054_088_010623	S42/S44	Email	Based on the sensitivity of the receptor (very high) and the magnitude of impact (high) the permanent habitat loss to the very soft chalk or clay with piddocks will be of Major adverse significance, which is significant in EIA terms. It would be useful to understand what measures are being proposed to mitigate impacts to the Peat and clay exposures. Under the Environment (Wales) Act 2016, public authorities must seek to maintain and enhance biodiversity in the exercise of their functions in relation to Wales. Peat and clay exposures with either existing or historical evidence of piddock activity are unusual communities of limited extent, adding to the biodiversity interest where they occur. NRW (A) query how deep the habitat is and whether it would be possible to carry out Horizontal Direction Drilling (HDD) at this location in order to avoid long-term habitat loss and/or whether it is possible to avoid the habitat by micro-siting?	Since the submission of the PEIR, open cut trenching has been removed from the project design and all export cables at the landfall will be installed via trenchless techniques. Furthermore, the Applicant is committed to ensuring that all construction activities at the Mona landfall associated with the trenchless techniques works will be located outside the clay with piddocks IEF. These measures which have been adopted as part of the Mona Offshore Wind Project will ensure that direct impacts (e.g. habitat loss or disturbance) to the ecologically sensitive and nationally protected clay with piddocks IEF will not occur.	Yes
Mon_054_089_010623	S42/S44	Email	With reference to Section 7.8.4.9Long-term habitat loss, NRW (A) are concerned that the potential impacts from trenchless techniques i.e. HDD in the intertidal have not been assessed, in particular the potential for requirement of cable protection in the exit pits,	Since the submission of the PEIR, open cut trenching has been removed from the project design and all export cables at the landfall will be installed via trenchless techniques. An assessment of the release of	Yes





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			resulting in long-term habitat loss. HDD might also result in the release of bentonite, which could have an impact on sensitive features in the intertidal (for example Sabellaria alveolata reef)—please refer to Section 1.1Physical Processes of the current document. As part of the ES, the applicant should assess the potential impacts from HDD to intertidal habitats.	bentonite during trenchless techniques has, however, been added to the assessment of increased SSC and sediment deposition on benthic receptors. The Applicant can confirm that no cable protection will be installed on the surface in the intertidal area. Further information can be found in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	
Mon_054_090_010623	S42/S44	Email	Furthermore, NRW (A) are concerned that the potential for the cable protection to become exposed in the intertidal during the operation of the development has not been assessed. Exposed cable could potentially require cable protection, resulting in further long-term habitat loss–please refer to Section 1.1Physical Processes of the current document to understand the concerns and assessment required	Since the submission of the PEIR, open cut trenching has been removed from the project design and all export cables at the landfall will be installed via trenchless techniques. The Applicant can confirm that no cable protection will be installed on the surface in the intertidal area. Further information can be found in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	Yes
Mon_054_091_010623	S42/S44	Email	With reference to Section 7.8.4.11Long term habitat loss (Menai Strait and Conwy Bay SAC), NRW (A) disagree that the magnitude of impact is low as the impact is predicted to be of long-term duration, continuous and non-reversible. Furthermore the area lost is large: 28,000m2. We understand there is a commitment to investigate opportunities to limit the extent of cable protection within the SAC, but at this point we have to base our assessment on the information that has been presented in the PEIR. NRW (A) therefore advise that the magnitude of impact should be considered High based on the scale of impact and that it is of long term-duration and non-reversible.	The Benthic subtidal and intertidal ecology technical report of the Environmental Statement has been updated to include the results of the site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Offshore Cable Corridor, including within Constable Bank and the Menai Strait and Conwy Bay SAC. The results of these surveys have demonstrated that there are no designated features of the SAC present in the small area of overlap with the Mona Offshore Cable Corridor. Therefore, there will be no long term habitat loss to any of the features of the SAC. Furthermore, the refinements to the project design since PEIR have resulted in a reduction in the extent of cables requiring cable protection within the SAC from 2,800 m in the PEIR to 800 m for the final application resulting in the long term loss of 8,000 m2 of non-designated habitats in the SAC (a reduction from 28,000m2 at PEIR), which represents 0.003% of the total area of the SAC.	Yes
Mon_054_092_010623	S42/S44	Email	Based on the sensitivity of the receptor and the magnitude of impact (High), the long-term habitat loss to Menai Strait and Conwy Bay SAC will be of Major adverse significance, which is significant in EIA terms. Further understanding of the extent of cable protection required within the SAC once the additional site-specific survey data is available will also determine whether there are any features present in the areas where the cable protection is being proposed (this is an assumption the PEIR has made in the absence of that data). NRW (A) await presentation of the data and the proposed locations of the cable protection, to understand whether the potential impact could be reduced further.	The Benthic subtidal and intertidal ecology technical report of the Environmental Statement has been updated to include the results of the site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Offshore Cable Corridor, including within Constable Bank and the Menai Strait and Conwy Bay SAC. The results of these surveys have demonstrated that there are no designated features of the SAC present in the small area of overlap with the Mona Offshore Cable Corridor. Therefore, there will be no long term habitat loss to any of the features of the SAC. Furthermore, the refinements to the project design since PEIR have resulted in a reduction in the extent of cables requiring cable protection within the SAC from 2,800 m in the PEIR to 800 m for the final application resulting in the long term loss of 8,000 m2 of non-designated habitats in the SAC (a reduction from 28,000m2 at PEIR), which represents 0.003% of the total area of the SAC.	Yes
Mon_054_093_010623	S42/S44	Email	With reference to Section 7.8.4.27-37Decommissioning phase, NRW (A) understand the assessment has assumed the worst-case scenario for the cable protection to be left in situ. In the absence of understanding future best practice, NRW (A)advise all options must be considered including complete removal of cable protection. Please refer to the report recently published by Natural England to inform the evidence gap in relation to the feasibility of and options for removing scour and cable protection upon decommissioning of offshore windfarms: Scour and Cable Protection Decommissioning Study -NECR403 (naturalengland.org.uk)	NRW's comment is noted and, where relevant, the MDS has been updated in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement for impact pathways where the removal of cable protection could represent a greater impact on benthic habitats than leaving it in situ (e.g. permanent habitat loss, introduction of artificial structures etc.).	No





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Mon_054_094_010623	S42/S44	Email	With reference to Section 7.8.5.1-9Colonisation of hard structures, NRW(A) are pleased to see that whilst the applicant has noted the potential creation of different marine habitat types from the colonisation of hard structures in their assessment, they have also acknowledged this pressure involves a permanent loss of one marine habitat type and a shift in the baseline conditions from soft substrate areas to hard substrate, in areas where the infrastructure is present.	The assessment of the introduction of artificial structures presented in section 2.9.7 of the Benthic subtidal and intertidal ecology technical report of the Environmental Statement also considers the shift in baseline conditions from soft substrate areas to hard substrate in areas where the infrastructure is present.	No
Mon_054_095_010623	S42/S44	Email	With reference to Section 7.8.6.10Intertidal habitat IEF, please refer to Paragraph 47above regarding the production of a Biosecurity Risk Assessment and Invasive Non-Native Species (INNS) Management Plan.	Response noted. A Biodiversity Risk Assessment and INNS Management Plan will be included within the Environmental Management Plan.	No
Mon_054_096_010623	S42/S44	Email	With reference to Section 7.8.6.21Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC, according to MarESA there is no evidence at present that the Cushion sponges and hydroids on turbid tide-swept sheltered circalittoral rock (CR.MCR.CfaVS.CuSpH) biotope has been affected by INNS, however, <i>Didemnum vexillum</i> could pose a potential threat. In light of this information and the known presence of <i>D. vexillumin</i> the proximity of the Mona OWF, NRW (A)advise that the sensitivity of this habitat to the introduction of INNS should be considered High (in line with the approach taken for the low resemblance stony reef IEF further above). The significance of effect for the CR.MCR.CfaVS.CuSpH biotope (Section 7.8.6.26) would still remain minor adverse and therefore not significant in EIA terms. Please note this comment also applies to the operational impacts from the potential introduction of invasive non-native species to the Annex I subtidal reefs IEF in Section 7.8.6.38and Section 7.8.6.41and to the decommissioning impacts in Section 7.8.6.53and 7.8.6.56respectively	Comment noted and the sensitivity of the biotope has been adjusted accordingly in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	No
Mon_054_097_010623	S42/S44	Email	With reference to Sections7.8.8.10-12, 7.8.8. 23 and7.8.8.34-39 Operations and maintenance phase(changes in physical processes to Constable Bank and Menai Strait and Conwy Bay SAC), please refer to comments raised in Section1.1Physical Processes of the current document, regarding the lack of assessment carried out on the potential impacts to physical processes from the placement of cable protection on Constable Bank and the Menai Strait and Conwy Bay SAC. Furthermore, no assessment on secondary scour has been carried out. Impacts to physical processes could have an indirect impact on benthic habitats. NRW (A) are therefore unable to agree with these conclusions until those assessments are carried out.	As outlined in Table 2.18 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement the Mona Offshore Wind Project has committed to no cable protection within Constable Bank and the assessments have been updated accordingly. The results of the relevant physical processes assessments presented in Volume 2, Chapter 1: Physical processes of the Environmental Statement have been brought through to the assessments in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement. An assessment of secondary scour can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement. A Cable Specification and Installation Plan will be developed with details of scour protection management to be used around offshore structures and foundations to reduce scour. The scour protection measures will be subject to engineering design to ensure they minimise as much as practical the occurrence of scour.	Yes
Mon_054_098_010623	S42/S44	Email	With reference to Section 7.8.8.13Intertidal habitat IEFs, in the assessment of temporary habitat loss/disturbance the applicant assumes the habitats will recover from the cable trenching activities as the trenches will be back-filled. However, in this section the assessment notes the burial of cable installation might be achieved by the provision of any necessary cable protection within the burial trench below bed level. Clarification is sought on whether the applicant intends to have cable protection within the cable trench before back-filling, how much / what type of cable protection (i.e. cable mattressing) and what depth the sediment will be above the cable protection. NRW(A) advise that in order for the benthic habitats to recover, there should be at least ca. 0.5m of the original sediment on top of the cable protection. Please note that this is linked to comments made on the potential impacts from open-cut trenching provided in Paragraph 49of the current document.	Since the submission of the PEIR, open cut trenching has been removed from the project design and all export cables at the landfall will be installed via trenchless techniques.	Yes
Mon_054_099_010623	S42/S44	Email	With reference to Section 7.8.9.10Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC, given the information presented, NRW (A) agree that the impact will result in a very minor alteration to one or more characteristics and can therefore be considered of	The Applicant can also confirm that no cable protection will be installed on the surface in the intertidal area.	Yes





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			negligible magnitude based on the definitions in Table 7.10Definition of terms relating to the magnitude of an impact. However, the argument presented here to define the impact of negligible magnitude implies the impact might be of higher magnitude than it is i.e. "The impact is predicted to be of local spatial extent, long term duration, continuous and high reversibility". We therefore advise that the definitions of terms relating to the 'negligible magnitude' of an impact in Table 7.10are incorporated here for clarity. This comment also applies to Section 7.8.10.9.		
Mon_054_100_010623	S42/S44	Email	With reference to Section 7.8.11Future monitoring, at this stage, NRW (A) are unable to agree that no future monitoring is required given the key issues raised above.	Since the submission of the PEIR, open cut trenching has been removed from the project design and all export cables at the landfall will be installed via trenchless techniques. Furthermore, the Applicant is committed to ensuring that all construction activities at the Mona landfall associated with the trenchless techniques works will be located outside the clay with piddocks IEF. The boundary of the Mona Offshore Cable Corridor and Access Area has been amended, post-PEIR, to exclude the Sabellaria alveolata reef and Mytilus edulis bed at the landfall. These measures which have been adopted as part of the Mona Offshore Wind Project will ensure that direct impacts (e.g. habitat loss or disturbance) to the ecologically sensitive IEFs at the landfall will not occur. Significant effects are therefore not predicted and no monitoring is deemed necessary.	Yes
Mon_054_101_010623	S42/S44	Email	In Table 2.6 Cumulative temporary habitat loss for the Mona Offshore Wind Project construction phase and other tier 1 plans/projects/activities in the CEA benthic subtidal and intertidal ecology study area, NRW(A) advise that the HyNet North West Hydrogen Pipeline Project should also be screened into the cumulative effects assessment for those sections of the project that are offshore and potentially for the cable landfall at the Point of Ayr. We note this project was screened out in Volume 5, Annex 5.1 Cumulative effects screening matrix, as no conceptual or physical effect receptor pathway was identified. There are three separate applications for HyNet, one of which could potentially interact with the Mona OWF.	The HyNet North West Hydrogen Pipeline Project has been included as a tier 3 project in the CEA in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and assessed accordingly although noting that only a Scoping Report was in the public domain at the time of writing and so no quantitative assessment has been possible.	No
Mon_054_102_010623	S42/S44	Email	With reference to Section 7.10.2.21Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC, please refer to comments made regarding Section 7.8.2.44in Paragraph 56of the current document, regarding the sensitivity of the Hiatella-bored vertical sublittoral limestone rock (CR.MCR.SfR.Hiato) biotope, as it is also applicable here.	The sensitivity of the CR.MCR.SfR.Hia biotope has been amended in section 2.9 and 2.10 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement as suggested by NRW.	No
Mon_054_103_010623	S42/S44	Email	Volume 6, Annex 7.1: Benthic subtidal and intertidal ecology technical report With reference to Section 1.8.3.39 Sabellaria alveolata reef, it would be useful if the applicant could provide photographs of what the isolated patches of <i>S. alveolata</i> located east of the main reef look like? Were these patches on boulders? NRW (A) understand that these patches did not meet the reef criteria, but if possible the boulders could be relocated to another area of the beach outside the direct cable trenching impact area.	The Benthic subtidal and intertidal ecology technical report of the Environmental Statement has been updated to include a photo of the patch of <i>S. alveolata</i> to the east of the main reef at Target Note 3 (TN3) where <i>S. alveolata</i> occurred between sea defences constructed of boulder and wood.	No
Mon_054_104_010623	S42/S44	Email	With reference to Table 1.16 IEFs within the Mona benthic subtidal and intertidal ecology study area, Sublittoral very soft chalk or clay with piddocks is noted as a sub-feature of the Menai Strait and Conwy Bay SAC feature. Our understanding is that the cable landfall and thus this habitat fall outside of the SAC boundary. If that is the case then the feature is not a sub-feature of the Menai Strait and Conwy Bay SAC. However, this habitat is still a Section 7 habitat protected under the Environment (Wales) Act 2016.	Comment noted and the IEF table has been updated accordingly in the Benthic subtidal and intertidal ecology technical report and chapter of the Environmental Statement.	No
Mon_054_105_010623	S42/S44	Email	Habitats Regulations Assessment Stage 2 Information to Support an Appropriate Assessment Please note that some of the concerns raised above are also applicable to the Habitats Regulations Assessment (HRA)Stage 2 Information to Support and Appropriate Assessment (ISAA), in particular: •No survey data has been presented in the PEIR to understand whether there are any potential Annex I features present within the cable route •Information on the potential locations of cable protection along the export cable route has	The Benthic subtidal and intertidal ecology technical report of the Environmental Statement has been updated to include the results of the site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Offshore Cable Corridor, including within Constable Bank and the Menai Strait and Conwy Bay SAC. The results of these surveys have demonstrated that there are no designated features of the SAC present in the small area of overlap with the Mona	No





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			not been presented Without the above information it is not possible to fully assess the potential impacts of the development on the Menai Strait and Conwy Bay SAC.	Offshore Cable Corridor. There will therefore be no direct impacts to any designated feature of the SAC and accordingly only indirect effects (e.g. increases in SSC and sediment deposition, and changes in physical processes) are assessed for the designated features of the SAC in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	
				On the basis that there is no direct overlap with any designated features of the Menai Strait and Conwy Bay SAC, all direct impacts have been screened out of the ISAA on the basis of no LSE.	
Mon_054_106_010623	S42/S44	Email	NRW (A) seek clarification regarding Table 1.3 A summary of all European sites for which the potential for LSE could not be discounted at the Stage 1 screening stage and for which appropriate assessment is required, on why the Dee Estuary SAC features have been screened into the ISAA and not into the PEIR. If a potential impact pathway is identified here, it is also applicable in the PEIR.	As demonstrated by the physical processes modelling (which was not available at the time of writing the LSE screening), there is no route to impact for the Dee Estuary SAC as it is outside the ZoI of the Mona Offshore Wind Project. Therefore, the features of the Dee Estuary SAC have not been considered in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement. The LSE screening for the final application has also been updated to now screen out the Dee Estuary for Annex I habitats on the basis of no receptor-impact pathway.	No
Mon_054_107_010623	S42/S44	Email	Also regarding Table 1.3, NRW(A) advise that the potential introduction of invasive non- native species should also be screened in for the relevant qualifying features of the Menai Strait and Conwy Bay SAC. The impact should then be taken through to the stage 2 appropriate assessment stage where the relevant mitigation measures i.e. the production and adherence to a Biosecurity Risk Assessment can then be implemented.	Noted at the impact associated with the introduction and spread on INNS is assessed in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and has been screened in to the Stage 2 ISAA.	No
Mon_054_108_010623	S42/S44	Email	Furthermore in Table 1.3, NRW (A) note that only the Annex I Reef and Annex I Sandbanks which are slightly covered by seawater all the time features have been screened in for the Menai Strait and Conwy Bay SAC. Clarification is sought on whether the potential for increases in Suspended Sediment Concentration (SSC)and sediment deposition could extend to other features of the SAC i.e. Submerged or partially submerged seacaves? It would be useful to see a map with the extent of the plume against the features of the Menai Strait and Conwy Bay SAC and also against the Dee Estuary SAC features to understand any potential overlap.	The assessment of increased SSC and sediment deposition in section 2.9.2 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and the Stage 2 ISAA has been updated to include further detail regarding the predicted nature of extent of plumes resulting from export cable installation in the Menai Strait and Conwy Bay SAC and noting that sandwave clearance has been removed from the PDE for the SAC. The modelled output presented in Volume 6, Annex 1.1: Physical processes technical report of the Environmental Statement includes scale bars and the applicable designated areas to aid in the interpretation of findings. The appropriate text relating to the modelled outputs and the SAC has been incorporated into the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and the Stage 2 ISAA. Due to the nature of the tidal flow, mobilised sediment is carried offshore and will not accumulate along the coastline (including the coastline within the SAC) and therefore there is considered to be no potential for an LSE on the submerged or partially submerged seacaves feature of the SAC.	
Mon_054_109_010623	S42/S44	Email	In Section 1.7.2.41Conservation Objectives, NRW (A) advise that the conservation objectives for the Dee Estuary SAC should be taken from the Regulation 33 advice package as these are the agreed conservation objectives for cross-border sites: Dee Estuary-Reg33-Volume 1-English-091209_1.pdf (naturalresources.wales)	Noted and the conservation objectives for the Dee Estuary SAC has been taken from the Regulation 33 advice package in the ISAA.	No
Mon_054_110_010623	S42/S44	Email	With reference to Table 1.7: Measures adopted as part of the Mona Offshore Wind Project relevant to the assessment of adverse effect on European sites designated for Annex 1 habitat features from temporary habitat loss/disturbance, NRW (A) advise that a full Biosecurity Risk Assessment and Invasive Non-Native Species (INNS) Management Plan is completed in relation to all marine operation activities associated with the current proposal. The risk assessment and management plan should include consideration of all activities, vehicles and equipment used as well as how the risk will be minimised through	Response noted. A Biodiversity Risk Assessment and INNS Management Plan will be included within the Environmental Management Plan.	No



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			appropriate mitigation and adherence to best practice guidance and management measures. The risk assessment should include a review of all the available data in relation to the presence of marine INNS where applicable to the current proposal, and the potential risks associated with each species identified.		
Mon_054_111_010623	S42/S44	Email	With reference to Sections1.7.3.36–38 Reefs, as noted previously, no spatial figures have been presented to understand the extent of the sediment plume and potential interactions with Annex I features of the Menai Strait and Conwy Bay SAC. Furthermore, until the results of the export cable route survey are presented, NRW (A) are unable to assess whether there are any potentially sensitive habitats that could be impacted by the plume, we are therefore unable to agree with the conclusions at this point.	The assessment of increased SSC and sediment deposition in section 2.9.2 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and in the Stage 2 ISAA has been updated to include further detail regarding the predicted nature of extent of plumes resulting from export cable installation in the Menai Strait and Conwy Bay SAC and noting that sandwave clearance has been removed from the project design for the SAC. The modelled output presented in Volume 6, Annex 1.1: Physical processes technical report of the Environmental Statement includes scale bars and the applicable designated areas to aid in the interpretation of findings. The appropriate text relating to the modelled outputs and the SAC has been incorporated into the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and the Stage 2 ISAA. Due to the nature of the tidal flow, mobilised sediment is carried offshore and will not accumulate along the coastline (including the coastline within the SAC) and therefore there is considered to be no potential for an LSE on the submerged or partially submerged seacaves feature of the SAC.	No
Mon_054_112_010623	S42/S44	Email	With reference to Sections1.7.3.95–99, should the results of the ECR survey data show that the cable route interacts with Annex I features of the Menai Strait and Conwy Bay SAC, the applicant will need to assess and carefully consider any potential long-term habitat loss to these features against the conservation objectives for the SAC. At this point and without the survey data, NRW (A)are unable to agree with the conclusions presented here for the potential long-term habitat loss of Annex I Reef and Annex I Sandbanks which are slightly covered by seawater all the time. We note there is a commitment to investigate opportunities to limit the extent of cable protection within the Menai Strait and Conwy Bay SAC. NRW (A) welcome this commitment and as per our advice during pre-application consultation, encourage the applicant to not place any cable protection within the SAC and in particular within Annex I features.	The Benthic subtidal and intertidal ecology technical report of the Environmental Statement has been updated to include the results of the site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Offshore Cable Corridor, including within Constable Bank and the Menai Strait and Conwy Bay SAC. The results of these surveys have demonstrated that there are no designated features of the SAC present in the small area of overlap with the Mona Offshore Cable Corridor. Therefore, there will be no long term habitat loss to any of the features of the SAC. Furthermore, the refinements to the project design since PEIR have resulted in a reduction in the extent of cables requiring cable protection within the SAC from 2,800 m in the PEIR to 800 m for the final application resulting in the long term loss of 8,000 m2 of non-designated habitats in the SAC (a reduction from 28,000m2 at PEIR), which represents 0.003% of the total area of the SAC. HRA: on the basis that there is no direct overlap with any designated features of the Menai Strait and Conwy Bay SAC, all direct impacts, including long term habitat loss, have been screened out of the ISAA on the basis of no LSE.	Yes
Mon_054_114_010623	S42/S44	Email	In Section 1.7.4.3 Assessment of adverse effects –in-combination with other plans and projects, NRW(A) advise that the potential introduction of INNS should also be considered in the in-combination assessment.	An assessment of the cumulative introduction of INNS is presented in 7.10.5 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement. An in-combination assessment of this impact pathway has also been included in the ISAA.	No
Mon_054_117_010623	S42/S44	Email	For clarity, it would be helpful to accurately signpost where the contaminated sediment assessment of the Environmental Statement (ES) takes place. In Volume 2, Chapter 6 Physical Processes, Table 6.5states that contaminated sediment will be assessed within the WFD assessment. However, it appears to have been considered in Volume 2, Chapter 7 Benthic Subtidal and Intertidal Ecology and Annex 7.1 Benthic Subtidal and Intertidal Ecology Technical Report.	All sediment chemistry data is presented in Volume 6, Chapter 2.1: Benthic subtidal and intertidal ecology technical report of the Environmental Statement. Other chapters and reports summarise and cross-reference this as appropriate. Volume 2, Chapter 2: Benthic subtidal and intertidal ecology cross references the Benthic subtidal and intertidal ecology technical report within the relevant assessments relating to sediment and water quality (i.e. assessment of the potential	No





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				release of sediment-bound contaminants). The WFD assessment (Volume 6, Annex 2.2: Water Framework Directive coastal waters assessment) and the physical processes assessment (Volume 2, Chapter 1: Physical processes of the environmental statement) do the same, where water quality aspects and sediment contaminants analysis is presented.	
Mon_054_118_010623	S42/S44	Email	In Volume 2, Chapter 7 Benthic Subtidal and Intertidal Ecology, Section 7.8.3.4Subtidal habitat IEFs, only arsenic is identified as being above the CEFAS Action Level 1. However, the data provided in Volume 6, Annex 7.1 Benthic Subtidal and Intertidal Ecology Technical Report, the sum of ICES 7 for Polychlorinated biphenyls (PCBs) is also above the CEFAS Action Level. There are also further questions with respect to conclusions drawn around PAHs (please see Paragraph 93below regarding text in Annex 7.1).	The Applicant notes that there were inconsistencies in the reporting of the sediment chemistry data for the PEIR which have been corrected for the final application. Levels of arsenic exceed Cefas AL1 (but was below AL2) at one station in the Mona Array Area and two stations in the Mona Offshore Cable Corridor. Levels of cadmium exceed Cefas AL1 (but was below AL2) at one station in the Mona Array Area. Levels of all other metals were below Cefas AL1. The results of total PCBs (compared to the Cefas AL1 and AL2 and the Canadian TEL/PEL thresholds) and total ICES-7 PCBs (compared to the Cefas AL1 threshold) are presented in Table 1.7 of the Benthic subtidal and intertidal ecology technical report submitted with the final application and none of the totals exceed the relevant thresholds. The full PCB results per station are also presented in Appendix F of the Benthic subtidal and intertidal ecology technical report.	No
Mon_054_120_010623	S42/S44	Email	The statement in Volume 6, Annex 7.1 Benthic Subtidal and Intertidal ecology technical report, Section 1.7.2.11Polycyclic aromatic hydrocarbons (PAHs), that PAHs are all below CEFAS Action Level 1 for individual PAHs does not appear to be correct given the data shown in Appendix G: Sediment contamination results, G2 Concentration of PAHs. For example, for site ENV36 Benzo(k)fluoranthene is given as 2 mg/kg where the Action Level 1 is 0.1 mg/kg.	The Applicant notes that there were inconsistencies in the reporting of the sediment chemistry data for the PEIR which included errors in the reporting units for PAHs and also in the thresholds presented for comparison (i.e. there are no Cefas ALs for PAHs). These errors have been corrected for the final application and concentrations of PAHs compared to the Canadian TEL and PEL, where available and also the Effects Range Low (ERL) and Effects Range Median (ERM) and, in all instances concentrations of PAHs in the sediments were below the relevant thresholds, where a threshold is specified.	No
Mon_054_122_010623	S42/S44	Email	With reference to Section 1.5.1.3 Impact Assessment, please refer to comments in Section 1.1Physical Processes and Section 1.2Benthic Subtidal and Intertidal Ecology of the current document, around the assessment of impacts on higher sensitivity habitats from landfall works. These concerns, and their solutions, will need to be fed through to the WFD assessment	The WFD assessment has been updated in accordance with the updates made in the Benthic subtidal and intertidal ecology chapter and Physical processes chapter of the Environmental Statement.	No
Mon_054_123_010623	S42/S44	Email	With reference to Section 1.5.1.13Water quality, in the context of the planned works to be undertaken, phytoplankton need to be assessed using information around suspended sediment.	Additional detail and context have been added to the water quality assessment within Volume 6, Annex 2.2: Water Framework Directive Coastal Waters Assessment and Volume 7, Annex 2.4: Water Framework Directive Surface Water and Groundwater Assessment to incorporate potential effects of increased SSC upon phytoplankton.	No
Mon_054_134_010623	S42/S44	Email	With reference to Sections 8.8.2.2 -11, Magnitude of Impact, whilst NRW (A) appreciate that habitat loss/disturbance will be temporary, according to Volume 1, Chapter 3, Project description, Figure 3.23 and Morgan Offshore Wind Project, Volume 1, Chapter 3, Figure 3.13), offshore construction activity area is timetabled throughout Q4 year 1 to Q1 year 4, which is likely to mean some level of disturbance for over 2.5 years within the array. Furthermore, as described in Section 8.8.2.15, Sensitivity of Receptor; Marine Species, gravelly and sandy habitats which form a large part of the array area, may take 5-10 years to recover. Therefore, NRW (A) are unable to agree that the magnitude of the effect can be considered as low. In the final ES, NRW (A) recommend that the habitat loss disturbance is quantified in the context of the availability of similar habitat types in the wider fish and shellfish study area.	Refinements have been made to the project design since the publication of the PEIR which have substantially reduced some of the project design parameters resulting in temporary habitat disturbance. Specifically the width of disturbance associated with sandwave clearance for export cables has been reduced from 80 m to 20 m. The result is that the total habitat disturbance predicted during the construction phase has more than halved from approximately 131km2 at PEIR to 61km2 for the final application. The Applicant is confident that this is consistent with the definition of a low magnitude (i.e. Some measurable change in attributes, quality or vulnerability, minor loss or, or alteration to, one (maybe more) key characteristics, features or elements). The magnitude of impact has been reviewed based upon the refined project description.	Yes





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Mon_060_007_010623	S42	Email	Benthic Ecology Comments Over-arching Comments Volume 1, chapter 3: Project description3.6.3 Unexploded Ordnance clearance Please note the Unexploded Ordnance Joint Interim Position Statement: Marine environment: unexploded ordnance clearance joint interim position statement –GOV.UK (www.gov.uk).This states that low noise alternatives to high order detonations should be prioritised. UXO clearance should be considered in the context of both underwater noise and seabed impacts. We welcome future engagement on UXO clearance.	The Applicant notes the response. Consideration of UXO craters is included in the assessment of temporary habitat disturbance/loss in section 2.9.1 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	No
Mon_060_008_010623	S42	Email	3.6.8.25 Scour protection for foundations JNCC appreciate that multiple types of scour protection, other than rock, have been considered in relation to scour protection for foundations. We are working on the assumption that the same consideration has been given to the cable and crossing protection. JNCC note that the final choice of scour protection will be made after detailed design of foundation structure and that several aspects will be taken into consideration when these decisions are made. The use of scour and cable protection across the Mona area should be minimised as far as possible. Consideration should be given to selecting scour and cable protection that most closely resembles the local environment where this is possible. JNCC would also like to see the potential for removal at decommissioning added to this list of considerations.	The proposed amount of cable protection has been refined from the PEIR to the Environmental Statement. Cable protection will only be installed where considered necessary, and minimised as far as is reasonably practical. With regards to scour protection, the Applicant will try to use rock that is similar to the rock that occurs naturally in the area. Whilst the project design assumes that cable and scour protection may be left in situ, where relevant, the MDS has been updated in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement for impact pathways where the removal of cable protection could represent a greater impact on benthic habitats than leaving it in situ (e.g. permanent habitat loss, introduction of artificial structures etc.).	Yes
Mon_060_009_010623	S42	Email	3.13.2.4 Foundations Currently the project description, with regard to the turbine foundations, states "any scour protection will be left in situ". Yet Volume 2, chapter 7: Benthic subtidal and intertidal ecology, 7.8.2.83 indicates that there is the potential for scour protection, and cable protection to be removed. JNCC would welcome more clarity on the likelihood of protection material removal at decommissioning to allow clearer assessment of permanent impacts resulting from the Mona project.	Whilst the project design assumes that cable and scour protection may be left in situ, where relevant, the MDS has been updated in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement for impact pathways where the removal of cable protection could represent a greater impact on benthic habitats than leaving it in situ (e.g. permanent habitat loss, introduction of artificial structures etc.).	Yes
Mon_060_010_010623	S42	Email	Volume 2, chapter 7: Benthic subtidal and intertidal ecology7.1.3 Study Area JNCC note that the incorporation of site-specific surveys for the Mona Offshore Cable Corridor and the Zone of Influence (ZOI) have not been incorporated within the PEIR. While JNCC were aware that this would be the case we would like to highlight that without this information we are unable to provide any meaningful and accurate advice in relation to the cable corridor or ZOI study areas. Assessment of these study areas will be addressed in the Environmental Statement and until such times JNCC is unable to provide comment.	site-specific surveys undertaken in 2022 (and not therefore reported in	
Mon_060_011_010623	S42	Email	7.8.4 Long term habitat loss JNCC note the classification of cable protection as long-term. Given the length of time that these materials will be in place (i.e. at least the project lifetime), JNCC would consider this to result in permanent habitat loss, particularly given the current lack of information on the feasibility of removal.	The MDS is for habitat loss is that cable protection to be left in situ following decommissioning (as this represents the greatest and longest loss of habitat). Therefore, the continued presence of cable protection, post-decommissioning, has also been considered as permanent habitat loss in the decommissioning phase of the long term habitat loss impact in section 2.9.4 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	Yes
Mon_060_012_010623	S42	Email	Detailed Comments Volume 1, chapter 3: Project description3.6.4.7 Sandwave clearance for cables, and sandwave clearance and/or seabed preparation for foundations JNCC note that "It is expected that material subject to seabed preparation activities will be deposited in the vicinity of where they were removed." JNCC would strongly recommend that any material from sandwave levelling or dredging be retained within the same sediment system from which it was removed. This could include, where appropriate, deposition upstream of the operations to allow natural backfill.	Noted, material from sandwave clearance will be deposited in the vicinity of the clearance site. Additionally, up to 7.2% of the sediment from seabed preparation in the Mona Array Area may be removed from the system to be used as ballast for the gravity base foundations. Further detail can be found in Volume 2, Chapter 1: Physical processes chapter of the Environmental Statement.	Yes





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Mon_060_013_010623	S42	Email	Volume 2, chapter 7: Benthic subtidal and intertidal ecology Figure 7.5: Results of the Annex I reef assessment within the Mona benthic subtidal and intertidal ecology study area JNCC would appreciate further information regarding the potential impact on Annex I Stony Reef from seabed impacts such as sandwave levelling and deposition of sandwave levelling sediments given that up to 50% of the inter-arrayand 60% of the interconnector cables would require sandwave clearance as well as up to 50% of foundation locations (Volume 1, chapter 3: Project description, Rev 04, dated 15/02/2023, 3.6.4.5 Sandwave clearance for cables, and sandwave clearance and/or seabed preparation for foundations).	The project design has been updated from PEIR, the width of sandwave clearance has been reduced from PEIR to the application. Further details of the Annex I stoney reef assessment have been presented in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology. Five stations within the Mona Array Area and ZoI were classified as low resemblance to Annex I stony reef (outside an SAC). The impacts of sandwave clearance and sediment deposition, including any potential effects on potential reef features, have been considered when assessing the temporary habitat disturbance/loss impacts.	Yes
Mon_060_014_010623	S42	Email	Table 7.14 maximum design scenario considered for the assessment of potential impacts on benthic subtidal and intertidal biology. While JNCC appreciated the attempts made to quantify the impacts from the Mona project, Table 7.15 could be much improved. JNCC would recommend, that all figures reflecting seabed impacts are broken down and collated into a reference tool (such as a spreadsheet) accounting for all impacts and allowing consultees to refer, check and compare figures to ensure full understanding of the impacts from the Mona project. It would also be helpful to have clear distinction between Statutory Nature Conservation Body inshore and offshore remits. The table currently switches between subtidal, tidal, array and offshore cable corridor resulting in difficulties assessing individual remits. JNCC note that quantitative figures have not been provided for all operations, in particular decommissioning, and no explanation has been provided as to why this is the case. We require justification as to why Scenario 2, 68 turbines(Volume 1, chapter 3: Project description, Rev 04, dated 15/02/2023, Table 3.6: Maximum design parameters: wind turbines) has been used over Scenario 1, 107 turbines. JNCC appreciate the 68 larger turbines may represent the worst-case scenario but justification and details as to why this is the case would be welcomed. With regard to repair works, JNCC would question how conclusions regarding repair and remediation works have been reached. JNCC are keen to understand where the estimated number of repairs and the estimated scale of impact from said repairs have been derived from. We would also query whether there is the potential for further remediation requirements which could impact on the seabed, such as additional scour protection.	The MDS table in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement has been restructured to group impacts which occur within the Mona Array Area, Mona Offshore Cable Corridor and landfall. This new presentation should improve the ability of the SNCBs to determine the figures relevant to their remit. Furthermore a summary table has been added to the chapter to summarise which IEFs have assessed for each impact. The Applicant considers that this presents the SNCBs with sufficient transparency in how the MDS has been calculated from the PDE for each impact to enable a full understanding of the impacts from the Mona Offshore Wind Project. Specific values regarding impacts in the decommissioning phase have not been quantified as the activities in the decommissioning phase will be guided by legislation and guidance which will be available at the time of decommissioning. To produce a precautionary assessment it has therefore been assumed that the magnitude of impacts such as temporary habitat loss in the decommissioning phase will be similar to the construction phase. This is precautionary as it is likely some structures will be left on the seabed and activities such as sandwave clearance would not be required. The suction bucket jacket 68 turbine scenario has been determined to be the MDS for long term habitat loss based on the parameters provided in the PDE. The options for a greater number of turbines (e.g. 96 suction bucket jacket foundations noting the option for 107 turbines has been removed from the PDE) however these options are associated with a smaller (i.e. from scour protection and the foundation itself) seabed footprint than the 68 turbine option. The PDE for cable repair and reburial activities has been generated based on experience from previous projects regarding the potential needs of each element of the project. These values are determined by the project engineers who have taken in to consideration a range of geophysical and logistical factors.	Yes
Mon_060_015_010623	S42	Email	7.8 Assessment of significant effects JNCC would like to highlight that the use of cable and scour protection can, in itself, cause secondary scour which should be included in assessment of significant effects. JNCC previously advised in our response to the Mona Offshore Wind Project Environmental Impact Assessment Scoping Report (Ref. EN010137-000008, JNCC Ref OIA-08713, dated 1 June 2022) 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	An assessment of secondary scour can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement. A Cable Specification and Installation Plan will be developed with details of scour protection management to be used around offshore structures and foundations to reduce scour. The scour protection measures will be subject to engineering design to ensure they minimise as much as practical the occurrence of scour. The effect of infrastructure in the water column and its effect on the tidal, wave and sediment transport regimes of the surrounding area has been considered in the changes in physical processes impact (section 2.9.8 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement).	Yes





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			surrounding habitats including the effects from scour and changes in hydrodynamics resulting from the introduction of hard substrate.	This impact of physical change to another seabed type has been captured in the assessment of the long term habitat loss impact (section 2.9.4 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement) where the pressure of physical change to another seabed type has been considered. The assessment of the introduction of artificial structures into a soft sediment environment, and the potential effects associated with new biological communities, is presented in section 2.9.5 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	
Mon_060_016_010623	S42	Email	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. It does not appear that this advice has been taken into account. It is not always clear which subtidal Important Ecological Features (IEFs)are being assessed. For example, 7.8.2.14 does not differentiate between the two subtidal IEFs, as such it is unclear whether both IEFs are being considered. JNCC would ask that it be highlighted, for each potential effect and each project phase, which IEFs are being considered. It would also be helpful to have one over-arching table providing a high-level overview of what IEFs have been assessed for each of the potential effects and project phases to assure the consultees that each outcome has been accounted for.	marine growth from foundations during the maintenance phase spans several impact pathways. As such this impact has been considered within two impact pathway assessments: 1) increased SSC and sediment deposition (i.e. in relation to the deposition and smothering element; section 2.9.2 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement) and 2) in the assessment of the introduction of artificial structures and the potential for this to extend the reef effect in the vicinity of foundations. The assessments presented within section 2.9 of the Benthic subtidal	
				and intertidal ecology chapter of the Environmental Statement have been updated to include an upfront paragraph clearly outlining which IEFs are relevant to the particular impact pathway. Furthermore a summary table has been added to the chapter to summarise which IEFs have assessed for each impact.	
Mon_060_017_010623	S42	Email	7.8.5.3 Subtidal habitat IEF We note the use of the term habitat creation throughout this section and Table 7.14. As noted in previous advice and as referenced above (7.8 Assessment of significant effects) the pressure should be referred to as habitat alteration or physical change to another sediment type. Section 7.8.5.4 notes potentially beneficial effects of an increase in biodiversity. Please note that in soft sediment areas it is unlikely that increases in biodiversity due to addition of artificial hard substrate would be considered a benefit.	The name of the impact pathway has been amended from 'Colonisation of hard structures' as presented in the PEIR to 'Introduction of artificial structures' for the final application and the relevant pressures used to inform this assessment are 'physical change to another seabed type'.	No
Mon_060_018_010623	S42	Email	Volume 6, annex 7.1: Benthic subtidal and intertidal ecology technical report1.7.6.4 Geogenic reef assessment JNCC would like to take the opportunity to reiterate the following advice. When assessing potential stony reef habitat, the use of Irving (2009) guidelines is correct, however, we would like to make bp / EnBW and RPS aware that JNCC and the Statutory Nature Conservation Bodies have also produced further guidance helping to refine the characterisation of 'low resemblance' reef. JNCC Report 656, published in September 2020 provides some overarching principles for the application of the Annex I stony reef guidance, specifically in relation to 'low resemblance' reef and the potential for reefs to have 'medium' or 'high' resemblance classification even when one or more of the criteria are 'low'. We request that the recent surveys be reviewed against this report to ensure that there are no other areas of 'medium' or 'high' resemblance reef present which may require further mitigation planning.hiip://data.jncc.gov.uk/data/4b60f435-727b-4a91-aa85-9c0f99b2c596/JNCC-Report-656-FINAL-WEB.pdf	Advice noted and the Golding et al. (2020) report has been reviewed as part of the site-specific data analysis. On this basis, the low resemblance reef within the Mona Array Area is deemed to be Annex I low resemblance reef (albeit outside the boundary of an SAC). No reef was recorded in the Mona Offshore Cable Corridor.	No
Mon_060_019_010623	S42	Email	1.7.6.1 Seapens and burrowing megafauna communities' assessment Given the presence of burrow abundance categorised as "frequent" on the SACFOR scale and that "no attempt was made to determine the species which formed the burrows" JNCC would question the conclusion that "no evidence of any species associated with 'sea pen and burrowing megafauna communities' habitat" and would therefore like to take the opportunity to reiterate the following advice. The definition of the OSPAR T&D feature 'Seapens and	The habitats assessments have been revisited and the results presented in the Benthic subtidal and intertidal ecology technical report of the Environmental Statement updated to include the seapens and burrowing megafauna communities habitat as an IEF on a precautionary basis due to the abundance of burrows present. This IEF is now assessed in in	No





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			burrowing megafauna communities' is the subject of on-going discussions between Contracting Parties as scientific knowledge improves, particularly for deep sea areas. OSPAR (2008) defines the 'Seapen and burrowing megafauna communities' feature as "Plains of fine mud, at water depths ranging from 15-200m or more, which are heavily bioturbated by burrowing megafauna with burrows and mounds typically forming a prominent feature of the sediment surface. The habitat may include conspicuous populations of seapens, typically <i>Virgularia mirabilis</i> and <i>Pennatula phosphorea</i> ." The narrative then notes that -"the tall seapen <i>Funiculina quadrangularis</i> may also be present." The OSPAR (2010) Background Document for Seapen and Burrowing megafauna communities instead notes that " burrows and mounds may form a prominent feature of the sediment surface with conspicuous populations of seapens"At a meeting of the OSPAR Contracting Parties in Bergen in November 2011, a key recommendation was that the presence of burrowing megafauna is the essential defining characteristic of the feature; the presence or absence of seapens does not in itself define the feature. Seapens may form a prominent feature of the seabed surface, but do not have to be present to define the OSPAR T&D habitat (SS.SMu.CFiMu.SpnMeg and/or SS.SMu.CFiMu.MegMax).	sections 2.9 and 2.11, where relevant of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	
Mon_060_020_010623	S42	Email	This assumption is equally true of the Scottish 'burrowed mud' PMF, with the exception of the seapen <i>Funiculina quadrangularis</i> , which is designated as part of this PMF. JNCC believe that this is the most up-to-date position on the composition of this habitat. JNCC have published the following report on the UK interpretation of the feature:JNCC clarifications on the habitat definitions of two habitat Features of Conservation Importance: Mud habitats in deep water, and; Seapen and burrowing megafauna communities In recent advice to Defra (concerning data from the Nephrops fisheries stock assessments) the threshold considered to demonstrate the presence of the OSPAR habitat Seapen and burrowing megafauna communities is a burrow density of >0.2/m2. For further information on classifying Seapen and burrowing megafauna communities from Nephrops stock surveys see Section 5.1 of the JNCC's 2014 advice on possible offshore Marine Conservation Zones considered for consultation in 2015, available at: hiip://data.jncc.gov.uk/data/91e7f80a-5693-4b8c-8901-11f16e663a12/2-pre-consultation-T2mcz-advice-140627-V5.0.pdf	The habitats assessments have been revisited and the results presented in the Benthic subtidal and intertidal ecology technical report of the Environmental Statement updated to include the seapens and burrowing megafauna communities habitat as an IEF on a precautionary basis due to the abundance of burrows present. This IEF is now assessed in in sections 2.9 and 2.11, where relevant of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	No
Mon_066_036_020623	S42	Email	We recommend that a Statement of Common Ground (SoCG) is started by the Applicant early within the EPP, to accurately catalogue all areas of agreement for the project and highlight any areas of disagreement. ETG consultation/agreement logs have been successfully used by other projects as the foundation for the SoCG.	The Applicant will develop Statement of Common Ground with all key stakeholders during the examination phase.	No
Mon_066_037_020623	S42	Email	Best Practice Advice for Offshore Wind Natural England has produced a series of documents to provide Environmental Assessments: Best Practice Advice for Evidence and Data Standards for offshore wind farm development in English inshore and offshore waters. The advice is provided in a series of documents which range from baseline characterisation surveys and pre-application engagement, through to expectations at application and post-consent monitoring.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_038_020623	S42	Email	The project is divided into four phases: Baseline characterisation surveys Pre-application engagement and the evidence plan process Data and evidence expectations at examination Post-consent monitoring and other environmental requirements.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_039_020623	S42	Email	The above link also provides access the Nature Conservation Considerations and Environmental Best Practice for Subsea Cables for English Inshore and UK Offshore Waters. This project provides Natural England and JNCCs joint environmental best practice advice for subsea cable projects in English inshore and UK offshore waters.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No





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Mon_066_040_020623	S42	Email	It is the expectation that developers follow our Best Practice through the application and consenting process. As such our advice and recommendations to the PEIR are framed around this advice.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_041_020623	S42	Email	If you have any issues using SharePoint Online, please contact the site owners or contact: REDACTED	The Applicant notes your response.	No
Mon_066_044_020623	S42	Email	Natural England's Structure/Framework for Attributing Risk. The comments provided within this letter and its Annexes have been colour coded using the structure/framework as specified in the risk table in Appendix I of this letter. In this letter, the coloured headings are coded based on the highest risk associated with the topic in question. Natural England would like to highlight that at this stage all comments highlighted as yellow, amber, or red need to be addressed, with the potential for these issues to become more significant if not resolved at application.	The Applicant notes your response.	No
Mon_066_045_020623	S42	Email	Impacts on the Natural Environment–Natural England's Key Concerns Generic Issues - MARKED RED BASED OFF THEIR APPENDIX Natural England highlights that for several receptors, the PEIR is based on incomplete data (offshore ornithology, marine mammals) or refers to additional data collection that is not presented or still to be carried out (physical processes, benthic ecology). Natural England cannot therefore make any conclusive judgements based on this PEIR, including the cumulative/in-combination assessments and the HRA. Accordingly, our advice focuses on the methodology used. We emphasise the need to base the submitted ES on robust datasets that meet (and where appropriate exceed) minimum standards, for example marine mammal and offshore ornithology impact assessments should be based on at least 24 monthly surveys.	The Environmental Statement has been based on robust datasets that meet/exceed minimum standards. For marine mammals and offshore ornithology assessments, two years of aerial survey data is presented and analysed (Volume 2, Chapter 4: Marine mammals chapter; Volume 2, Chapter 5: Offshore ornithology chapter). The benthic and physical processes assessments have been informed by 2022 and 2023 intertidal surveys, and 2021 and 2022 subtidal benthic surveys (Volume 2, Chapter 1: Physical processes chapter; Volume 2, Chapter 2: Benthic subtidal and intertidal ecology chapter).	No
Mon_066_046_020623	S42	Email	We also highlight the risks associated with further data processing to validate the conclusions and having sufficient time to consult pre-application and sufficiently resolve matters prior to submission. We reserve the right to change our comments and position during the ES consultation, subject to the outcome of further data analysis. Furthermore, Natural England seeks confirmation that the timetable set out for DCO submission allows for evidence standards to be met.	Noted. The Applicant confirms that the timetable set out for DCO submission allows for evidence standards to be met.	No
Mon_066_047_020623	S42	Email	Please note that Natural England defer to Natural Resources Wales as the relevant statutory consultee in some instances. This is reflected by the use of a Purple RAG rating in our advice.	The Applicant notes your response.	No
Mon_066_048_020623	S42	Email	Physical Processes, Benthic Ecology and Fish Ecology - MARKED PURPLE BASED OFF THEIR APPENDIX Natural England notes that many of the thematic areas require additional monitoring, surveys and data analysis prior to submission We highlight the risks associated with further data processing to validate the conclusions made in the PEIR. In particular that we are unable to advise on the potential scale and level of risk this project may pose to nature conservation during this consultation. Additionally, it is unclear to Natural England how this project will progress towards submission and ensure there is sufficient time to incorporate the outstanding data which is needed to validate conclusions made in the PEIR, and inform the Environmental Statement (ES).	The Benthic subtidal and intertidal ecology technical report of the Environmental Statement has been updated to include the results of the site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Array Area Zol and the Mona Offshore Cable Corridor, including within Constable Bank and the Menai Strait and Conwy Bay SAC, and the intertidal survey undertaken in 2022 and 2023. The updated Benthic subtidal and intertidal ecology technical report of the Environmental Statement was submitted to the SNCBs via the Benthic Ecology, Fish and Shellfish and Physical Process EWG on 2 October 2023 (i.e. ahead of the final application) for comment. The results of the 2022 and 2023 surveys (i.e. the IEFs identified) have been carried through to, and assessed fully in, the Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	Yes
Mon_069_014_010623	S42	Email	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	Comment noted and the information in the MMEA has been referenced in the Benthic subtidal and intertidal ecology technical report of the Environmental Statement to characterise the wider regional benthic subtidal and ecology study area. The MMEA is further referred to within Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and	No





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			detail will be provided below in respect of specific areas of the MMEA that should be reviewed.	Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement, and Volume 2, Chapter 4: Marine mammals of the Environmental Statement and Volume 6, Annex 4.1: Marine mammals technical report of the Environmental Statement (3.4 (a) Marine Mammals - Cetaceans and 3.4 (b) Seals).	
Mon_069_015_010623	S42	Email	Clarity is sought as to some statements within the PEIR in respect of dredging activities within the Island's harbours and volumes associated with these activities. The Department of Infrastructure can provide this data should it be requested by the project team.	Comment noted and the information in the MMEA has been referenced in the Benthic subtidal and intertidal ecology technical report of the Environmental Statement to characterise the wider regional benthic subtidal and ecology study area.	No
Mon_069_020_010623	S42	Email	Chapter 7 Benthic Subtidal and Intertidal Ecology Table 7.24, 7.25 (throughout this chapter and elsewhere, including Fish and Shellfish Ecology) For the Isle of Man projects listed below; Douglas Harbour, Isle of Man-Castletown Bay, Isle of Man –not aware of this as a current operation	Comment noted and in the absence of a confirmed position on whether these dredging projects in the Isle of Man are active, they have been included on a precautionary basis in CEA in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and the CEA in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement	No
Mon_069_021_010623	S42	Email	Has IoM Government (Department of Infrastructure) (DoI) been consulted on the details and assumptions related to the above projects? It is not clear whether these projects are active, or that the correct quantities or assumptions about waste disposal sites have been made. Recommend clarification with DoI.	Comment noted and in the absence of a confirmed position on whether these dredging projects in the Isle of Man are active, they have been included on a precautionary basis in CEA in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and the CEA in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement	No
Mon_069_024_010623	S42	Email	Designated sites Noting: 7.4.6.3 Of the identified designated sites in Table 7.8, only the Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC has been taken forward for assessment within this chapter. Noted with respect to Isle of Man Marine Nature Reserves.	Comment noted and the Applicant confirms that all Isle of Man Marine Nature Reserves are located out with the zone of influence of the Mona Offshore Wind Project.	No
Mon_069_311_010623	S42	Email	Subtidal and intertidal ecology1.6.1.5No potential transboundary impacts upon benthic subtidal and intertidal ecology are anticipated. It is proposed that transboundary impacts on benthic subtidal and intertidal ecology are screened out of the EIA process. NOTED.	Comment noted and no transboundary impacts upon benthic subtidal and intertidal ecology are predicted in the final application.	No
Mon_069_322_010623	S42	Email	In addition, MNH provides the following general comments: •The need for protection of the seabed with particular reference to areas of high conservation or carbon sequestration value, such as sea grass beds, <i>Zostera marina</i> , as highlighted in the Manx Marine Nature Reserves.	Comment noted and the Applicant confirms that all Isle of Man Marine Nature Reserves are located out with the zone of influence of the Mona Offshore Wind Project.	No
Mon_069_324_010623	S42	Email	·Protection of the seabed from scour and silt during the positioning of rock berms and trench digging and removing boulders.	Comment noted and the MDS for all impact pathways has been fully assessed in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement. It should be noted that all Isle of Man Marine Nature Reserves are located out with the zone of influence of the Mona Offshore Wind Project.	No
Mon_088_008_040623	S42	Email	The WTW advocates that projects such as Mona OWF deliver strategic compensation, and strategic marine environment monitoring throughout the life cycle of the OWF. Conform to at a minimum the OWF environmental standards/ nature-based design standards as proposed in BESS, and commit to deliver Biodiversity Net Gain (BNG). Comparative terrestrial projects are mandated by the Environment Act 2021 to deliver BNG. As OWF projects move progressively offshore and out of designated waters the developer should be required to demonstrate that the BNG measures undertaken have a positive impact on existing habitat and biodiversity, including no habitat loss and are location specific. It is important that intertidal, coastal and offshore measures are delivered where appropriate. Marine BNG should be proportional to the size and impact of the individual project, but ensure that the measures are mutually inclusive of other project BNG deliverables. This strategic approach will ensure a positive feedback loop to BNG.	Response noted. Onshore, intertidal and offshore biodiversity benefit opportunities for the Mona Offshore Wind Project are explored in the Biodiversity Benefit and Green Infrastructure Statement of the Environmental Statement (Document Reference J7).	No
Mon_088_010_040623	S42	Email	Mona Array Area WTW understands that the benthic sub tidal ecology baseline and assessment of the	The Benthic subtidal and intertidal ecology technical report of the Environmental Statement has been updated to include the results of the	No



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			maximum design scenario (MDS), which includes the Mona Array Area and the Mona Offshore Cable Corridor, as presented in the PIER is not all determined on site specific data collection. Baseline characterisation is required in accordance with the Infrastructure Planning (EIA) Regulations 2017. However, the baseline characterization should only be considered a 'snapshot' of the present benthic ecosystem.	site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Offshore Cable Corridor, including within Constable Bank and the Menai Strait and Conwy Bay SAC. The results of these surveys (i.e. the IEFs identified) have been carried through to, and assessed fully in, the Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	
Mon_088_013_040623	S42	Email	Geotechnical and geophysical survey information will be collected but at this time detailed knowledge of the pelagic and benthic environment is not known. Site investigation will reduce project risk by identifying opportunities and limitations in environmental constraints and impacts enabling a fit-for-purpose design which manages seabed and water column risk.	A summary of the geophysical and benthic surveys undertaken for the Mona Offshore Wind Project that have been used in the characterisation of the benthic subtidal ecology baseline are summarised in section 1.7.2 of the Benthic subtidal and intertidal ecology technical report of the Environmental Statement.	No
Mon_088_014_040623	S42	Email	The Mona Array represents ~450km2 area of potential benthic surface change. The introduction of OWF infrastructure; 68 to 107 monopiles, 4 offshore substations, inter-array cabling, cable protection and scour prevention methods, at this scale into a predominantly soft sediment benthic environment will see a hard substrate created as a consequence of the cumulative impact. This will see a change in benthic community type from infauna to epifauna dominance, which will in-turn see a change in the dominant feeding type. This represents a bottom-up-pressure which will ultimately impact predator-prey relationships.	The numbers quoted by the Wildlife Trust Wales in the S42 response represented the total area of the Mona Array Area presented in the PEIR. It should be noted, however, that not all seabed within the Mona Array Area will be affected. Following the refinement of the project design after PEIR there is predicted to be up to 2,252,412 m2 of long term habitat loss and 2,745,616 m2 of artificial structures introduced within the Mona Offshore Wind Red Line Boundary. Additionally the option for 107 turbines has been removed from the project design as has the option for monopile foundations. The impact of a potential change in community has been considered primarily in section 2.9.5 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement (i.e. introduction of artificial structures), where consideration is given to the impact of these new communities on the existing soft sediment environment. The potential impact of this change further up the food chain is considered in Volume 2, Chapter 8: Fish and shellfish ecology of the Environmental Statement.	
Mon_088_024_040623	S42	Email	The proposed ECC makes landfall in the vicinity of the Traeth Pensarn Site of Special Scientific Interest (SSSI). WTW understands that this concern has been raised by Natural Resources Wales (NRW) and the developer has amended the MDS accordingly. However, WTW is still concerned that the proposed route to the West of the SSSI will impact sensitive reef and soft sediment features recorded in this area, including honeycomb worm reef; Sabellaria alveolate, and vegetated shingle. These features are susceptible to sediment resuspension, trenching, and drilling activity. The Sabellaria alveolate reef at Llanddulas acting as the larvae source site for recruitment at other sub-populations in the North East Irish Sea, and the vegetated shingle site identified as one of 13 judged to be of significant importance in Wales.	Direct impacts to the <i>Sabellaria alveolata</i> reef at the Mona landfall have been avoided through the use of trenchless techniques which have resulted in the reef now being located outside the Mona Offshore Wind project Red Line Boundary. Regarding the potential indirect effects, such as an increase in suspended sediment concentrations, these have been assessed within the Environmental Statement. Additionally during construction works, the Applicant commits to a 50 m exclusion buffer from the edge of the <i>Sabellaria alveolata</i> reef, as per industry standard practice. The buffer will be based on the extent of the reef as mapped during the 2023 Mona Phase I intertidal survey. The modelling predicts that some sediment may be deposited on the shoreline with a maximum depth of around 18 mm at the trenching location and reducing to up to 10 mm in close proximity (circa 100 m – 200 m) and typically far less along the shoreline (1 mm to 2 mm) which is redistributed further on successive tides flowing cable installation. The Applicant is therefore confident that a 50 m exclusion buffer based on the extent mapped in the 2023 surveys is sufficiently precautionary to minimise any potential indirect effects. Regarding the coastal vegetated shingle site protected as part of the SSSI within the Traeth/Pensarn SSSI, this feature is found above the high water spring line and is outside the Mona Offshore Wind Project Red Line Boundary resulting in no potential impact pathways in regard to the intertidal works being undertaken for the Mona Offshore Wind Project.	
Mon_088_025_040623	S42	Email	The ECC will pass though the Liverpool Bay SPA; specific concerns arsing from which the WTW will defer to responses made by the Royal Society for the Protection of Birds (RSPB), and the Menai Strait and Conway Bay SAC, as well as the aforementioned SSSI.	Comment noted and the Benthic subtidal and intertidal ecology chapter of the Environmental Statement includes a full assessment of the impact on the benthic habitats in Constable Bank and the Menai Strait and	No



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			These designated sites reflect the biodiversity importance of the area's intertidal sands, reefs and sandbanks. The proposed ECC encroaches on the sandbank feature known as Constable Bank which the developer acknowledges. The soft sediments of this area are breeding and spawning sites for several commercial fish species, including Atlantic Herring <i>Clupea harengus</i> , and other identified species of principle importance. The decline of fish recruitment and collapse of stocks in the Irish Sea is contributed to by the increasing pressure which is being applied to nursery grounds of which Constable Bank is an example. Further industrialisation of this area may breach a threshold beyond which the disturbance cannot be accommodated by the environment.	Conway Bay SAC, although noting that none of designated features of the SAC are present within the small area of overlap with the Mona Offshore Cable Corridor (as determined by the site-specific surveys) and so will not be directly impacted. The potential effects on fish species and their habitats have been assessed in full in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement. Soft sediments are not typically used by herring for spawning. Relevant fish spawning and nursery grounds are characterised and assessed within Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement.	
Mon_088_031_040623	S42	Email	The assessed impact of the inter array cables has been previously discussed in the Mona Array Area section of this response. An evidence-based assessment of benthic change impact which includes the developer response to resurfacing, and BNG measures to be undertaken, is advocated by the WTW.	The numbers quoted by the Wildlife Trust Wales in the S42 response represented the total area of the Mona Array Area presented in the PEIR. It should be noted, however, that not all seabed within the Mona Array Area will be affected. Following the refinement of the project design after PEIR there is predicted to be up to 2,192,412 m2 of long term habitat loss and 2,685,616 m2 of artificial structures introduced within the Mona Offshore Wind Red Line Boundary. Additionally the option for 107 turbines has been removed from the PDE as has the option for monopile foundations. The impact of a potential change in community has been considered primarily in section 2.9.5 of Volume 2. Chapter 2 Benthic subtidal and intertidal ecology chapter of the Environmental Statement (i.e. introduction of artificial structures), where consideration is given to the impact of these new communities on the existing soft sediment environment. The potential impact of this change further up the food chain is considered in Volume 2, Chapter 8: Fish and shellfish ecology of the Environmental Statement. Intertidal and offshore biodiversity benefit opportunities for the Mona Offshore Wind Project are explored in Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7).	
Mon_146_003_260523	S47	Feedback form	Care must be taken not to damage the honeycomb worm reef at Llanddulas.	The Sabellaria alveolata reef at the landfall has been fully surveyed and mapped by the Applicant. Since the submission of the PEIR, the boundary of the Mona Offshore Cable Corridor and Access Area has been amended to exclude the Sabellaria alveolata reef and Mytilus edulis bed at the landfall. Furthermore, the Applicant is committed to installing the export cables at the landfall via trenchless techniques (i.e. no open cut trenching in the intertidal). These measures will ensure there are no direct impacts to the reef.	Yes
Mon_156_005_010623	S47	Feedback form	The whole project MUST be abandoned because it is damaging to the Manx people, industries, and economy, plus ecology and marine life.	Impacts to marine ecology receptors and human receptors (e.g. shipping and navigation, commercial fisheries and socio-economics including the interaction with lifeline ferry services) have been fully assessed for all phases of the project, based on a maximum design scenario approach. Designated sites within the Isle of Man territorial waters, and their associated habitats and species, have been considered and documented in the assessment process. Seascape and visual impacts and impacts on designated heritage assets from the offshore infrastructure have also been considered. The assessment has engaged with stakeholders from the Isle of Man to ensure all relevant and available data has been included and is therefore based upon the best evidence to underpin the assessment of impacts. Most assessments have determined that there will be no significant effect from the Mona Offshore Wind Project. Where a significant effect has been identified, the Applicant has set out appropriate mitigation within the application. Detailed mitigation will be	





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				determined post-consent once the project parameters are fully refined and understood. Key stakeholders, including those on the Isle of Man, will be consulted to ensure the mitigation approach is suitable.	
Mon_168_001_200423	S47	Consult Online	Absolutely all for wind power in the Irish Sea, but please make sure you don't impact the critical IOM Ferry routes and any sensitive coral or fish nursery areas on the seabed of the Irish Sea, of which there are many. It would be excellent to see offshore wind projects coupled with officially recognised marine park zones once they are constructed - seems like an easy win for you, and I imagine they are areas where dredge fishing are restricted anyway.	The Benthic subtidal and intertidal ecology technical report of the Environmental Statement includes the full baseline characterisation for the Mona Offshore Wind Project based on site-specific surveys undertaken in 2021 and 2022. No corals were recorded during these surveys. The Applicant is however committed to reducing impacts on sensitive benthic habitats and has adopted a number of measures as part of the Mona Offshore Wind Project to avoid such impacts (e.g. no cable protection in Constable Bank). Further information can be found in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology. A detailed assessment has been conducted to fully appraise the potential impacts to marine life, including fish and shellfish, and identify any mitigation measures or monitoring required to minimise any potential impacts. Further information can be found in Volume 2, Chapter 3: Fish and shellfish ecology. A full assessment of impacts to shipping and navigation can be found in Volume 2, Chapter 7: Shipping and navigation.	Yes

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D.25.9 Fish and shellfish ecology table of responses



Table D.25. 9: Fish and shellfish ecology table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_051_007_310523	S42	Email	Volume 2, Chapter 8: Fish and Shellfish Ecology-Major Comments The herring spawning habitat suitability assessment has been completed following the guidelines of Boyle and New (2018), rather than the recommended MarineSpace (2013) methods for herring and sandeel. The MMO recommends 'heat' map of potential herring spawning habitat and potential sandeel habitat is formed, following the MarineSpace methods. These methods use a suite of data to determine potential herring spawning habitat and potential sandeel habitat, including particle size analysis (PSA)data, British Geological Survey (BGS) data, Regional Seabed Monitoring Plan (RSMP) data, herring larval survey data, fishing fleet data and scientific publications	A combination of the Boyle and New (2018) and MarineSpace (Latto et al., and Reach et al., 2013) approaches have been used to define potential herring spawning grounds and sandeel grounds. The criteria for prime, sub-prime, suitable and unsuitable substrates has been drawn from the MarineSpace (2013) methods and applied as appropriate for herring and for sandeel, and the criteria has been adapted to "preferred", "marginal" and "unsuitable" classifications, to align with the Folk classification groupings available in EMODnet, and presented together with EMODnet substrate classifications, and mapped spawning grounds defined by Coull et al. (1998) for herring and Ellis et al. (2012) for sandeel in Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement. Heat mapping of aggregated 10-years of NINEL herring larval data has been undertaken using kernel density plots, following consultation with Cefas and NRW, and incorporated into the Environmental Statement within Volume 6, annex 3.1: Fish and shellfish ecology technical report.	Yes
Mon_051_008_310523	S42	Email	The MMO notes that mapped data, to inform the assessment on habitat suitability for herring spawning grounds, has been provided. However, the MMO disagrees that there will be no significant impacts to herring. The study area includes the herring spawning ground off the Isle of Man (Ellis et al., 2011/Coull et al., 1998/Dickey-Collas et al., 2001). Figures 8.6 and 8.7 indicate that the 135decibel (dB)behavioural effect threshold noise contour for mono-piling overlaps much of the known Isle of Man herring spawning ground. Whilst the 135dB noise contours are not shown in the maps of herring larval densities shown by the NINEL data (Figures 1.15 to1.17), a rudimentary comparison by eye also indicates that there will be an overlap of noise disturbance with areas of low, medium and high larval densities. For these reasons, predicted impacts from underwater noise (UWN)to herring will be significant. There is potential for UWN due to piling activities to interfere with herring spawning activities including aggregating, spawning and laying eggs, which could result in avoidance of the spawning grounds or reduced spawning success. Therefore, it is likely the MMO will recommend temporal mitigation in the form of a piling restriction during the Isle of Man herring spawning season (1 September to 31 October inclusive). However, more certainty in the UWN assessment will need to be provided, before the MMO can be sure the above mitigation is appropriate. The MMO recommends that additional noise reduction mitigation is used in the form of bubble curtains (see Würsig et al., 1999), or other alternative measures.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. Further information has been presented within the assessment for underwater sound impacts from pile driving to provide more certainty in the data, including mapped contours for concurrent piling and contours presented with the aggregated 10-year NINEL larval contour plot to support visual interpretation of the data. Measures adopted as part of the project for underwater sound are presented within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3)	Yes
Mon_051_009_310523	S42	Email	The report has quantified the impacts to fish spawning grounds and habitat as a percentage of area affected. The MMO does not recommend the calculation of total spawning habitat for the following reasons: The calculation is usually based on previous nursery/spawning ground date, however areas can change over time or become recolonised. (ii)Whilst spawning and nursery ground maps are used to provide the most recent and appropriate information to identify spawning areas, they do not fully define/consider/identify the following: •All potential areas of spawning;•Any habituation that may occur;•Specific substrate requirements;•More suitable topography;•Environmental factors that may influence spawning intensity such as temperature, oxygenation, natural disturbance, anthropogenic disturbance etc.;•Calculations of specific spawning areas are based on peak spawning times i.e., the number of days of a spawning period rather than considering the entire spawning season. The MMO recommends acknowledging the overlap with the spawning and/or nursery grounds but to avoid quantifying the impacts based on percentage overlap.	It is recognised that mapped spawning and nursery grounds do not represent a hard boundary and changes occur over time in terms of extent and intensity of activity and are based on historic data. Based on feedback from NRW, presentation of percentage overlap with mapped spawning and nursery grounds has been included where appropriate in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement, however this percentage overlap will not form the basis of the assessment in line with the feedback from the MMO.	No
Mon_051_010_310523	S42	Email	Figures 8.4 to 8.7 map noise contours between 120dB and 150dB as overlapping with the Wyre Lune and Ribble Estuary Marine Conservation Zones (MCZ). These values fall below the 186dB cumulative sound exposure level (SELcum) threshold for temporary threshold shift (TTS)in fish, however given		No





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			that there is considerable uncertainty with the UWN modelling provided, the MMO considers at this stage that MCZs with fish as designated features should not be screened out of further assessment until the necessary clarifications the UWN modelling and assessment have been resolved.	assessment for underwater sound impacts from pile driving to provide more certainty in the data, including mapped contours for concurrent piling and contours presented with the Wyre Lune MCZ and Ribble Estuary MCZ in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement.	
Mon_051_011_310523	S42	Email	Minor Comments 2.5. The MMO notes that ten impacts were identified for fish receptors with two being scoped out for all phases, and a further two scoped out for one or more phases. The report has scoped in temporary habitat loss/disturbance and long-term habitat loss as potential impacts to fish receptors during all stages of the development. Given the lifespan of the project (30+ years of operation) and considering not all infrastructure will be removed during decommissioning, it cannot be guaranteed that alterations made to the habitat will be fully reversed once decommissioning is complete. With this in mind, 'long-term' alterations to the habitat should be considered 'permanent'.	Long term habitat loss, where appropriate, has been considered permanent within Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement, in acknowledgment that changes to the habitat may not be fully reversed following decommissioning.	No
Mon_051_017_310523	S42	Email	The Maximum Design Scenario (MDS) stated in Table 8.15 is not the same as that stated elsewhere in the report. The MDS stated in the Project Description Chapter should be 107 wind turbine generators (WTG)and four OSPs, whereas 'Increased Suspended Sediment Concentrations (SSCs) and associated sediment deposition' and 'UWN' state 68 WTGs and one OSP is the MSD. Additionally, in Table 3.15, in Volume 1, Chapter 3: Project description, it states the MDS will be jacket foundations with four legs with up to two pin-piles per leg, however three legs with two pin-piles per leg is considered the MDS in document Table 8.16 of Volume 2, Chapter 15: Inter-related effects (offshore). The final report should clearly and consistently state the MDS with respect to piling throughout the PEIR when estimating the impacts of UWN and SSC on fish receptors	For each of the impacts assessed within the topic chapters (Volume 2, Chapters 1 to 11; Volume 3, Chapters 1 to 11; and Volume 4, Chapters 1 to 4), the MDS is identified from the range of potential options for each parameter within Volume 1, Chapter 3: Project description of the Environmental Statement. The MDS assessed is therefore the scenario which would give rise to the greatest potential impact, and therefore effect, and can vary depending on the impact being assessed.	Yes
Mon_051_018_310523	S42	Email	The report has provided noise contours down to 110dB for the most sensitive fish receptors; this covers the 135dB threshold (Hawkins et al.,2014) which is recommended for determining an impact range for behavioural responses in herring. The report suggests that 160dB should be considered a more appropriate threshold and has cited a number of studies to support this, however all but one study focus on less acoustically sensitive fish species, with only one study assessing herring (Doksaeter et al., 2012). Additionally, Doksaeter et al., (2012) found that although naval sonar transmissions did not elicit a significant behaviour response below 168dB for herring, impulse sounds from striking a fence did produce a response at a lower sound exposure level of 145dB. For these reasons the MMO disagrees with the use of 160dB for a behavioural response threshold for acoustically sensitive fish receptors such as herring. The MMO recommends focusing on the 135dB threshold as per Hawkins et al., (2014) for the UWN assessment.	Additional clarity has been provided within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement with regards to the different metrics used and the measured differences between such metrics (based on Bellman et al., 2020). SPLpk and SELss metrics are presented, based on the 135dB SELss threshold and the equivalent SPLpk.	no
Mon_051_019_310523	S42	Email	The MMO considers the cumulative impacts of UWN on sensitive fish receptors, such as herring and cod, will be significant in EIA terms. The fact that the construction timelines of developments overlap mean it is possible that piling activity may be undertaken at multiple OWF sites at the same time, resulting a more significant concurrent piling scenario. The proximity of OWF developments also means that there will be significant overlaps for impacts such as TTS, with the impact range for piling at Mona estimated to be 39.2km.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. Appropriate mitigation measures have been considered where necessary following the assessment of the impacts of underwater sound from pile driving cumulatively with other projects, based upon the revised modelling outputs in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement. Measures adopted as part of the project for underwater sound are presented within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3)	Yes
Mon_051_020_310523	S42	Email	Minor Comments 6.5. The impacts of UWN due to unexploded ordnance (UXO) clearance have been briefly assessed withing the PEIR and are to be further assessed within the final report, once preconstruction survey results of UXOs are available. Consent for UXO clearance is usually the subject of a separate marine licence application (MLA). Whether as part of the DCO application or a separate MLA, the MMO expects to see supporting evidence and an appropriate assessment of impacts to fish from UXO to be presented for review. The assessment should include an UWN impact assessment using the hearing threshold guidelines for explosions (Popper et al., 2014).	UXO clearance is included in the application for consent to ensure all pre-construction activities are covered. Underwater sound modelling has been undertaken for UXO clearnace and injury ranges are presented to support the EIA and HRA. The hearing thresholds within Popper <i>et al</i> 2014 have been used were appropriate.	No
Mon_051_033_310523	S42	Email	Volume 6, Annex 8.1: Fish and shellfish ecology technical report Major Comments	The PSA data classifications have been adjusted to reflect "preferred", "marginal" and "unsuitable" in all figures and	No





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			The habitat suitability assessments presented within Figures 1.14 and 1.18 for herring and sandeel, use EMODnet seabed sediment and site-specific grab sample data to characterise seabed sediments inside the project boundary and across the wider study area. The tables for both herring and sandeel are presented appropriately. However, for herring and sandeel, the EMODnet data is then overlain by site-specific PSA data which has been categorised as "Prime, Sub-Prime, Suitable and Unsuitable". The MMO recommends the PSA data is presented as sediment classifications using the Folk Sediment classification units (Folk, 1954), and colour-coded to be consistent with the 'preferred' and 'marginal' habitat preferences for herring and sandeel. Doing so will ensure that the PSA data are easily comparable to EMODnet sediment data and will prevent misinterpretation. The MMO also recommends having the PSA data for analysed sample locations provided in a table, with the constituent proportions of sand, gravel and mud (as a percentage), for review, in order to verify the Applicant's categorisation of the PSA samples.	associated text describing substrate suitability for herring and sandeel to better align with the EMODnet seabed substrates data. The PSA data (% of fines, sands and gravel) is presented within the Benthic subtidal and intertidal ecology technical report of the Environmental Statement (Volume 6, annex 2.1).	
Mon_051_034_310523	S42	Email	The MMO considers the impacts of UWN to cod will be significant, given the acoustic sensitivity of cod and the proximity and importance of the spawning grounds. It is likely that the MMO will recommend temporal piling restrictions as mitigation for cod. However, more certainty in the UWN assessment will need to be provided, before the MMO can be sure the above mitigation is appropriate.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. Appropriate mitigation measures have been considered where necessary following the assessment of the impacts of underwater sound from pile driving cumulatively with other projects, based upon the revised modelling outputs in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement. Measures adopted as part of the project for underwater sound are presented within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3)	Yes
Mon_051_035_310523	S42	Email		Heat mapping of aggregated 10-years of NINEL herring larval data has been undertaken using kernel density plots, following consultation with Cefas and NRW, and incorporated into the Environmental Statement within Volume 6, annex 3.1: Fish and shellfish ecology technical report.	No
Mon_053_009_010623	S47	Email	There can be sea-bed changes as windfarms can, over time, affect the depth of water, and can obstruct tidal streams (whether this affects marine life or not?) and that offshore windfarms (the noise from the turbines) can impact fauna and other marine life; and	In relation to physical processes, the impacts related to obstructions to tidal flow are detailed within the physical processes assessment (Volume 2, Chapter 1: Physical processes of the Environmental Statement). In relation to marine mammals, the impacts of changes in physical processes is scoped out of the assessment for marine mammals as agreed through the Scoping Opinion. Noise from operational turbines is assessed in Volume 2, Chapter 4: Marine Mammals of the Environmental Statement. In relation to fish and shellfish, the Mona Offshore Wind Project EIA Scoping Report (Mona Offshore Wind Limited, 2022) discusses the noise generated during operation of turbines and provides full justification for scoping this impact out of further consideration for fish and shellfish ecology within the Environmental Statement (Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement).	Yes
Mon_054_005_010623	S42/S44	Email	Fish and Shellfish Ecology: NRW (A) can not agree with several aspects of and conclusions in the PEIR, due to either the methodologies used or lack of justification for the approaches taken. We provide advice on the further work necessary.	Thank you for the feedback, the specific items will be responded to individually for clarity.	No





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Mon_054_011_010623	S42/S44	Email	Fisheries: NRW (A) seek clarification regarding assessments undertaken and provide advice on appropriate mitigation.	Fisheries are considered Volume 2, Chapter 3: Fisheries and Shellfish of the Environmental Statement	No
Mon_054_119_010623	S42/S44	Email	NRW (A) agree in Table 8.16 Impacts scoped out of the assessment for fish and shellfish ecology, that accidental pollution can be scoped out of the assessment provided mitigation measures are included in the ES	Thank you for the feedback, the impact of accidental pollution will remain scoped out of assessment for Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_054_124_010623	S42/S44	Email	Fish and ShellfishEcology1.4.1Key Issues NRW (A) do not agree that the impacts from underwater noise on fish receptors can be assessed as 'minor adverse' either alone or in-combination with other planned projects in Liverpool Bay.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. Appropriate mitigation measures have been considered where necessary following assessment of the impacts of underwater sound from pile driving based upon the revised modelling outputs in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement. The project has concluded that there may be a significant effect on herring spawning for the project alone and on cod and herring spawning cumulatively as a result of piling. The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Project refinements and potential mitigation options will be considered within the Underwater Sound Management Strategy (UWSMS), an outline of which has been submitted with the application for consent. The UWSMS will be updated post-application, discussed and agreed with stakeholders.	
Mon_054_125_010623	S42/S44	Email	NRW (A) agree with the conclusions of no adverse effects on site integrity for qualifying Annex II diadromous fish features on the Dee Estuary and River Dee and Bala Lake SACs.	The Applicant notes your response.	No
Mon_054_126_010623	S42/S44	Email	Detailed comments1.4.2.1HRA Screening Report, Screening Matrices and Integrity Matrices With reference to Section 1.3.3.6, Initial Identification for Annex II fish, NRW(A) welcomes the adaptation of the regional screening approach for Atlantic salmon (and pearl mussel).	The Applicant notes your response	No
Mon_054_127_010623	S42/S44	Email	With reference to Section 1.4.4.3, Dee Estuary/Aber Dyfrdwy SAC, NRW (A) note that although twaite shad (<i>Alosa fallax</i>) have been recorded in a fish trap on Chester weir near the tidal limit of the River Dee, there are no records of a spawning population in the river.	Thank you for this feedback, reference to this statement has been incorporated into Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement to support baseline characterisation, and the HRA Stage 2 ISAA Part 1: Intro and background and Part 2: SAC assessments.	No
Mon_054_128_010623	S42/S44	Email	1.4.2.2Volume 2, Chapter 8: Fish and Shellfish Ecology NRW (A) note that Table 8.7, Summary of site-specific survey data reports that the Benthic Subtidal Surveys for the offshore cable corridor and Zone Of Influence (ZOI) have not been included within the PEIR. The assessment of impacts to herring spawning habitat and in particular to, sandeel habitat, rely in part on these site-specific results and are consequently incomplete. The advice below is provided on the understanding that full benthic survey results do not significantly change the proportions or availability of sandeel or herring habitat.	Since PEIR, a full survey dataset has been collected and included in the Environmental Statement. The 2022 benthic subtidal ecology survey data is presented within Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement to support baseline characterisation, with further details presented within Volume 6, annex 2.1: Benthic subtidal and intertidal ecology technical report of the Environmental Statement.	No
Mon_054_129_010623	S42/S44	Email	With reference to Section 8.4.7.1, Important ecological features, the assigning of Species of Principal Importance (SPI) status versus Important Ecological Features (IEF) is not clear or consistent, nor is it clear how the further assessment takes SPI status into consideration. Some species, such as twaite and allis shad are designated as IEF and SPI although they do not breed in any rivers in the study	Species of Principal Importance (SPI) in England are assigned under the NERC Act (2006), and the determination of Important Ecological Features takes into account this listed status. Text has been added to Volume 6, annex 3.1: Fish and shellfish	No





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			area, while others such as spurdog, which is protected and has nursery grounds overlapping the array area is only assigned IEF status.	ecology technical report of the Environmental Statement to clarify that SPI status is not assigned by the author.	
Mon_054_130_010623	S42/S44	Email	NRW (A) advise that Table 8.10, Defining criteria for IEFs, is amended so that any fish listed as IUCN Red list listed or under OSPAR as Critical endangered/Threatened or Vulnerable is of International Value.	IEF defining criteria has been reviewed for Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement, noting NRW's comments.	No
Mon_054_131_010623	S42/S44	Email	With regard to Table 8.11, IEF species and representative groups within the Mona Offshore Wind Project, NRW (A) refer to comments above regarding the importance of some fish species. For instance, species such as European eel and Basking shark, both of which are IUCN red list, should be of International Importance. NRW (A) also note that for cod it states that cod is not an important commercial species in the area. Cod stock in the Irish sea collapsed around the year 2000 and catches have been decreasing since so there has been very limited or no commercial fishing for the species. As such, NRW (A) do not consider a lack of commercial fishing to provide suitable justification for assigning cod as lower importance	IEF defining criteria has been reviewed for Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement, noting NRW's comments. The status of the cod stock in the study area has been taken into account in the valuation of the receptors and the resulting impacts assessments.	No
Mon_054_132_010623	S42/S44	Email	Within Table 8.15, Maximum design scenario considered for the assessment of potential impacts on fish and shellfish ecology, NRW (A) note that the maximum design scenario for underwater noise is for 68 monopiles. However, in Volume 1, Chapter 3 Project Description, Table 3.6 Maximum design parameters: wind turbines, it states that the array will either be of 68x16 m diameter monopiles or 104 smaller wind turbine generators. Whilst NRW (A) agree that larger monopiles may require higher hammer energy and may produce a larger spatial ensonified area, the total duration of piling may increase with the increase in number of piles. NRW (A) advise that this needs to be clarified in the final ES to ensure that a realistic worst case is assessed.	The MDS presented in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement has been updated to reflect the exclusion of monopiles from the project design.	Yes
Mon_054_133_010623	S42/S44	Email	Table 8.17, Measures adopted as part of the Mona Offshore Wind Project includes implementing soft-start and ramp-up as a primary measure to reduce the potential for impacts to fish and shellfish receptors. Soft-start and ramp up is also mentioned as a mitigation measure throughout the remainder of the chapter. Whilst NRW (A) recognise that soft-start and ramp-up are standard practise in piling operations, we are unaware of any evidence to support their effectiveness to mitigate impulsive noise impact for fish or elicita fleeing behaviour. Furthermore, due to the lack of evidence to support fleeing behaviour, NRW (A) advised in the Expert Working Group (EWG) that spawning fish are assessed as static receptors. Consequently, NRW (A) advise that within the final ES assessment, a realistic worst case scenario discounting soft-start and ramp-up measures is presented.	As the soft-start and ramp up process will be engaged for marine mammal mitigation on the Mona Offshore Wind Project, it is therefore not considered appropriate to discount this in the underwater sound modelling to ensure a realistic scenario is presented. Soft starts also reduce the instantaneous sound entering the marine environment from background levels. It is acknowledged that some fish species will benefit from this measure, and others will not. Based on this, fish will be presented as both static and fleeing receptors in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement, with the reality likely somewhere in-between the two. Fish will still be subject to all sounds present in the water column. As such the impacts on the fish of these phases have been modelled for both static and moving receptors.	No
Mon_054_134_010623	S42/S44	Email	With reference to Sections 8.8.2.2 -11, Magnitude of Impact, whilst NRW (A) appreciate that habitat loss/disturbance will be temporary, according to Volume 1, Chapter 3, Project description, Figure 3.23 and Morgan Offshore Wind Project, Volume 1, Chapter 3, Figure 3.13),offshore construction activity area is timetabled throughout Q4 year 1 to Q1 year 4, which is likely to mean some level of disturbance for over 2.5 years within the array. Furthermore, as described in Section 8.8.2.15, Sensitivity of Receptor; Marine Species, gravelly and sandy habitats which form a large part of the array area, may take 5-10 years to recover. Therefore, NRW (A) are unable to agree that the magnitude of the effect can be considered as low. In the final ES, NRW (A) recommend that the habitat loss disturbance is quantified in the context of the availability of similar habitat types in the wider fish and shellfish study area.	Refinements have been made to the project design since the publication of the PEIR which have substantially reduced some of the project design parameters resulting in temporary habitat disturbance. Specifically the width of disturbance associated with sandwave clearance for export cables has been reduced from 80 m to 20 m. The result is that the total habitat disturbance predicted during the construction phase has more than halved from approximately 131km2 at PEIR to 61km2 for the final application. The Applicant is confident that this is consistent with the definition of a low magnitude (i.e. Some measurable change in attributes, quality or vulnerability, minor loss or, or alteration to, one (maybe more) key characteristics, features or elements). The magnitude of impact has been reviewed based upon the refined project description.	Yes





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Mon_054_135_010623	S42/S44	Email	NRW (A) note in Section 8.8.2.23, Herring and sandeel, that the site-specific surveys do not include the cable corridor. NRW (A) expect that the assessment of impacts to sandeel and herring habitat will be updated in the final ES.	The 2022 benthic subtidal ecology survey data has been presented within Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement to support sandeel and herring substrate suitability assessment, with further details of the survey presented within Volume 6, Annex 2.1: Benthic subtidal and intertidal ecology technical report of the Environmental Statement.	No
Mon_054_136_010623	S42/S44	Email	Within Section 8.8.2.33Herring and Sandeel, the sensitivity of herring is 'downgraded' from medium/high to low based on the lack of suitable habitat in the array area. NRW (A) advise that sensitivity should remain as high and availability of suitable habitat is better considered in scoring the magnitude of the impact. According to Table 8.12Definition of terms relating to the magnitude of an impact,low magnitude is defined as "Some measurable change in attributes, quality or vulnerability, minor loss or alteration to (maybe more) key characteristics, features or elements". As described above, NRW (A) advises that in the final ES habitat loss is assessed as loss of suitable habitat (feature) within the array area as percentage of the availability of that feature in the wider fish and shellfish study area.	The magnitude of impact and sensitivity of herring and sandeel has been reviewed in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement to account for NRW's comments. The sensitivity of herring has been amended to high in section 3.9.2.37, and availability of suitable habitat has been discussed under the magnitude in section 3.9.2.12, of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement. This has included quantification of the impact relative to suitable habitats in the study area, although it should be noted that spawning and nursery habitat mapping is broadscale so these proportions should be interpreted with caution.	
Mon_054_137_010623	S42/S44	Email	Provided that the updated ES based on the site-specific surveys do not significantly increase the impacted area of sandeel habitats, NRW (A) agree with Section 8.8.2.41Significance of effect, Marine species, that the overall significance of the impact to sandeel is assessed as minor adverse.	Thank you for this feedback; the 2022 data has been reviewed to determine any changes in baseline characterisation of sandeel in Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement, and the assessment significance of habitat loss in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement	No
Mon_054_138_010623	S42/S44	Email	With reference to Section 8.8.2.42Significance of effect, Marine species, as discussed above NRW (A) do not agree with 'downgrading' herring sensitivity to low. If assessed as medium/high sensitivity with a low magnitude, based on the limited herring spawning habitat available in the fish and shellfish area, the resulting significance of effect would be minor or moderate adverse. NRW (A) advise that if in the final ES this approach is adopted, along with a qualitative expert assessment considering the available evidence, the final overall significance of effect on herring spawning habitat is likely to be low adverse and hence not significant in EIA terms.	The sensitivity of herring has been amended to high in section 3.9.2.45 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement, resulting in an effect of minor adverse significance which is not significant in EIA terms.	No
Mon_054_139_010623	S42/S44	Email	Volume 2, Chapter 8, Section 8.8.3 Underwater noise impacting fish and shellfish receptors As a general comment, in this section it would be beneficial to include reference to the relevant tables and information presented in Volume 5, Annex 3.1: Underwater sound technical report. This would greatly aid the reader in crosschecking information.	Additional cross-referencing has been implemented between Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement and the assessment of underwater sound impacts on fish and shellfish ecology in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement	No
Mon_054_141_010623	S42/S44	Email	A large number of scenarios for piling are described using various metrics and assumptions, however it is difficult to discern which single scenario represents the realistic worst case. Noise may act on fish IEFs at various levels both directly through death/injury to fish in the ensonified area and indirectly through TTS and behavioural effects/masking.	Additional clarity has been provided in the text in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement to clearly explain the scenario which underpins the assessment, and how the other materials presented feed into this.	No
Mon_054_142_010623	S42/S44	Email	NRW (A) note that in several places soft-start and ramp up procedures are included in the noise assessment. However, as detailed above NRW (A) is not aware of any evidence of this being effective for fish, and furthermore NRW (A) (and other key consultees) have advised in the EWG meetings that fish should be modelled as static receptors. NRW (A) strongly recommend that in the final ES impacts are only presented for fish as static receptors.	As the soft-start and ramp up process will be engaged for marine mammal mitigation on the Mona Offshore Wind Project, it is therefore not considered appropriate to discount this in the underwater sound modelling to ensure a realistic scenario is presented. Soft starts also reduce the instantaneous sound entering the marine environment from background levels. It is acknowledged that some fish species will benefit from this measure, and others will not. Based on this, fish will be	No





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				presented as both static and fleeing receptors in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement, with the reality likely somewhere in-between the two. Fish will still be subject to the all sounds present in the water column. As such the impacts on the fish of these phases have been modelled for both static and moving receptors.	
Mon_054_143_010623	S42/S44	Email	The assessment of impacts from underwater noise is further obfuscated by not adhering to the assessment criteria adopted in other sections. Thus, the magnitude of the effect of underwater noise impact does not follow the definition from Volume 1, Chapter 5: Environmental Impact Assessment methodology, Table 5.4Definition of the spatial extent, duration, frequency and reversibility when defining the magnitude of an impact, or those in Volume 2, Chapter 8, Table 8.12Definition of terms relating to the magnitude of an impact, to include the spatial extent of the impact. Rather the spatial extent of the impact is considered in the context of the sensitivity of the IEF, which according to the assessment methodology should be based on the receptor importance, vulnerability and recoverability only.	Tables defining the magnitude and sensitivity on receptors to underwater sound are included in Volume 2, Chapter 4: Marine mammals of the Environmental Statement and Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement. They define magnitude and sensitivity specifically for marine mammal or fish and shellfish receptors and therefore will differ from the generic magnitude/sensitivity tables or tables that have been developed for other ecological receptors, or those included in Volume 1, Chapter 5: EIA Methodology of the Environmental Statement. The assessment for those chapters aligns with the defined sensitivity and magnitude for those receptors.	No
Mon_054_144_010623	S42/S44	Email	NRW (A) recommend that for clarity in the final ES, one assessment for each species of particular interest (sandeel, cod and herring) is presented which shows each individual effect of noise (injury/death, TTS, behavioural effects and effects to eggs/larvae) and the resulting 'cumulative' or overall significance of the effect. This is particularly relevant for the subsequent assessments of interrelated and cumulative impacts on IE Fspecies.	Whilst the magnitude section of the assessment for underwater sound is applied to all species considered, the sensitivity and impact significance are described for each species separately, with particular focus on herring and cod. In addition, species specific summaries have been included as requested by NRW at the end of the sensitivity section, with particular focus on cod and herring, other marine fish species (including sandeel), shellfish and diadromous fish.	No
Mon_054_145_010623	S42/S44	Email	NRW (A) are unable to agree with the conclusions of minor adverse effect to fish from underwater noise due to the limitations specified above (and further detailed below).	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. Appropriate mitigation measures have been considered where necessary following assessment of the impacts of underwater sound from pile driving based upon the revised modelling outputs in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement. The project has concluded that there may be a significant effect on herring spawning for the project alone and on cod and herring spawning cumulatively as a result of piling. The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Project refinements and potential mitigation options will be considered within the Underwater Sound Management Strategy (UWSMS), an outline of which has been submitted with the application, discussed and agreed with stakeholders.	
Mon_054_146_010623	S42/S44	Email	In Section 8.8.3.4 Construction Phase, Magnitude of impact, the scenario of two vessels piling concurrently at 35.2 km distance is described, however, it is not clear in the subsequent assessment	The project design envelope has been refined since submission of the PEIR, and updated noise modelling has been undertaken. Concurrent piling ranges are presented in Volume 5, Annex 3.1:	





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			(or from Volume 5, Annex 5.1 Underwater Sound Technical Report) where the impact from this scenario is presented.	Underwater sound technical report, indicating that the concurrent piling ranges are similar to single piling, therefore concurrent piling is not expected to significantly increase the impact level. Additional clarity has been provided in the text in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement to clearly explain the scenario which underpins the assessment.	
Mon_054_147_010623	S42/S44	Email	With reference to Section 8.8.3.7 Construction Phase, Magnitude of impact, and Sections 8.8.3.15 – 20 Injury and Section 8.8.3.40 Diadromous species responses –behaviour, please see Paragraph 106 relating to soft-start mitigation and fleeing behaviour.	As the soft-start and ramp up process will be engaged for marine mammal mitigation on the Mona Offshore Wind Project, it is therefore not considered appropriate to discount this in the underwater sound modelling to ensure a realistic scenario is presented. Soft starts also reduce the instantaneous sound entering the marine environment from background levels. It is acknowledged that some fish species will benefit from this measure, and others will not. Based on this, fish will be presented as both static and fleeing receptors in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement, with the reality likely somewhere in-between the two. Fish will still be subject to all sounds present in the water column. As such the impacts on the fish of these phases have been modelled for both static and moving receptors.	No
Mon_054_149_010623	S42/S44	Email	Section 8.8.3.15 Injury, states that the greatest realistic predicted injury ranges result from a single monopile scenario, however, this appears to contradict Annex 3.1, Section 1.9.2.13 Concurrent Piling, which states that "For injury the MDS is considered to be that of two adjacent piles, separated by a distance of 1km due to the maximal overlap of sound propagation contours leading to the maximum generated sound levels." NRW (A) advise that in the final ES it is clear what constitutes the realistic worst-case scenario (with fish as static receptors) and why. This should be based on the largest area ensonified to the relevant threshold, whether resulting from simultaneous piling at two spatially separate areas added together, or the enhanced field resulting from simultaneous piling at adjacent piles separated by 1km. To aid understanding, it would be beneficial if this information on worst case noise contours was also presented in a mapped format.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. Additional mapped outputs, including for concurrent piling, have been presented in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement. This has included mapping of concurrent piling and presentation of injury ranges for both single and concurrent piling scenarios (noting that the maximum injury ranges for fish associated with concurrent piling may not necessarily be additive from a given piling location). The updated underwater sound modelling has been used to inform the refined maximum design scenario. Additional cross-referencing has been implemented between Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement and additional text has been added to Volume 2, chapter 3: Fish and shellfish ecology to ensure the scenario being assessed it clear.	
Mon_054_150_010623	S42/S44	Email	Section 8.8.3.16states that stationary or passive eggs will likely be protected through scheduling of operational timing to avoid peak egg densities where possible, however, this measure is not included as proposed mitigation. NRW (A) advise that in the final ES it is made clear whether timing restrictions for impact piling will be implemented, which species they applied to and the extent to which it will mitigate for effects to both spawning fish and developing eggs/larvae.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. Appropriate mitigation measures have been considered where necessary following assessment of the impacts of underwater sound from pile driving based upon the revised modelling outputs in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement. The project has concluded that there may be a significant effect on herring spawning for the project alone and on cod and herring spawning cumulatively as a result of piling. The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. Timing restrictions will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate.	





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				Project refinements and potential mitigation options will be considered within the Underwater Sound Management Strategy (UWSMS), an outline of which has been submitted with the application for consent. The UWSMS will be updated postapplication, discussed and agreed with stakeholders.	
Mon_054_151_010623	S42/S44	Email	Sections 8.8.3.16 –17provide various ranges for Peak Sound Pressure Levels (SPLpeak)and Cumulative Sound Exposure Level (SELcum). However, as described in the Popper et al., (2014) guidelines (page 34) "Since there is also concern for effects of multiple strikes where no single strike approaches the SPLpeak, the final step in the development of criteria is to define an SELcum which is based on the combination of SELss and number of strikes that would result in the onset of the lowest level of injury (RSI) that would be considered deleterious to the species of concern." Based on this, the most appropriate metric to use as a threshold is SELcum as it takes into account the cumulative effects of strikes over the piling operation. However, underwater sound modelling results are presented for both in SPLpea kin Table 8.18 Criteria for Onset of Injury to Fish due to Impulsive Piling (Popper et al., 2014)and SELcum in Table 8.20 Fish Injury Ranges for Single Monopile Installation Based on the Cumulative SEL Metric for Fleeing Fish, for fish as static receptors, and it is not clear which information is used going forward in assessing the sensitivity of various IEF fish. As per comments above for Section 8.8.3.15, NRW (A) advise that a realistic worst case is clearly identified and fully explained in the final ES.	Additional clarity has been provided in the text in section 3.9.3, Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement to clearly explain the scenario and metrics which underpin the assessment, and how the other materials presented feed into this. Fish mortality and injury ranges have been presented using both SPL and SELcum thresholds set out by Popper et al. (2014) with discussion of both these thresholds included in the accompanying text to account for the variability in responses to sound across the various fish species. As requested, both static and moving receptors have been modelled, noting that for some fish receptors the static assumption may be more relevant than a moving receptor.	No
Mon_054_153_010623	S42/S44	Email	NRW (A) broadly welcome the approach used to quantitatively assess behavioural effects of underwater noise on fish outlined in Section 8.8.3.30, in the absence of such thresholds in the Popper et al., (2014) guidelines. We note however, that there is no table presenting this information, nor is this scenario presented in Annex 3.1 Underwater Sound Technical Report. As noted above for the ranges presented for mortality/injury, it is not clear why SPLpeak has been presented rather than SELcum, given that the impact is still from piling over several hours and so a cumulative effect is to be expected. NRW (A) recommend that in the final ES further information is provided on how and why the scenario for the 160 SPLpeak contours represents a realistic worst case.	Additional clarity has been provided in the text in section 3.9.3, Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement to clearly explain the scenario and metrics which underpin the assessment, and how the other materials presented feed into this. Mortality and injury ranges are presented for both SPL and SELcum thresholds, as recommended by Popper et al. (2014) to account for variability in fish responses to underwater sound. Section 3.9.3 also presents the behavioural effects of underwater sound on fish, with additional rationale presented for the use of the 160 dB SPLpk to inform the behavioural effects assessment presented. The use of this threshold as a guide is based on a number of studies of effects on fish behaviour, as set out and discussed in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement	No
Mon_054_154_010623	S42/S44	Email	Sections 8.8.3.31 –39describe the sensitivity of fish receptors to underwater noise and provide the quantified loss of habitat for sandeel, cod and herring as well as some references on the recoverability or vulnerability of the species. As described in our general comments on underwater noise above, NRW (A) advise that for clarity and consistency the spatial extent of the impact is considered as the magnitude of effect, rather than being part of the sensitivity of receptor assessment.	The magnitude of impact and sensitivity of fish and shellfish receptors for the underwater sound impact assessment has been reviewed. The spatial extent of the impact of underwater sound on fish and shellfish receptors is considered with the magnitude of effect in section 3.9.3 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement	No
Mon_054_155_010623	S42/S44	Email	The figure presented in Section 8.8.3.31for behavioural effects for sandeel is 12.14% of available sandeel habitat in the fish and shellfish study area. NRW (A) advise that based on the definitions for magnitude, this would represent a high or medium magnitude impact to sandeel. However, NRW (A) agree that sandeel are less sensitive (less vulnerable) to sound than fish in group 3 and 4 and that they have high recoverability. Based on this and their importance it is realistic to score sandeel as low sensitivity overall for impacts from underwater noise.	Thank you for this feedback. The magnitude of impact and sensitivity of fish and shellfish receptors for the underwater sound impact assessment has been reviewed and presented within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_054_156_010623	S42/S44	Email	With reference to Section 8.8.3.32, NRW (A) advise, as above for sandeel, that an impact to cod spawning habitat of 12.32% should be assessed as being of high to medium magnitude. We note that the duration of piling may be short, but unless timing restrictions are proposed there is a risk that piling could coincide with the spawning season. Cod are a group 3 fish and vocalise during spawning and are therefore of high vulnerability to underwater noise. Cod are listed as vulnerable on the IUCN list and as threatened under OSPAR, furthermore local cod stocks in the Irish sea are depleted.	Thank you for this feedback. The magnitude of impact and sensitivity of fish and shellfish receptors for the underwater sound impact assessment has been reviewed and presented within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement. he status of the cod stock in the	No





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			Consequently, NRW (A) advise that cod should be considered to be of low to medium recoverability, making them overall of medium to high sensitivity to impacts from underwater sound.	study area has been taken into account in the valuation of the receptors and the resulting impacts assessments.	
Mon_054_157_010623	S42/S44	Email	NRW (A) agree in Sections 8.8.3.33 –34, that herring should be considered of high vulnerability to impacts from underwater sounds. NRW (A) note that similar to the assessments above for cod, effects are described as potentially being less due to the risk of overlap with herring spawning season. NRW (A) advise that in the final ES, unless timing restrictions are included as mitigation and conditioned, a risk remains that piling could affect spawning herring. NRW (A) further note that no overall conclusion is apparent for sensitivity for herring. Based on herring being a group 4 fish of national importance and medium recoverability, NRW (A) advise that herring are considered as of high sensitivity to impacts from underwater sound.	Thank you for this feedback. The magnitude of impact and sensitivity of fish and shellfish receptors for the underwater sound impact assessment has been reviewed and presented within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement. The overall conclusion of herring sensitivity has been included.	No
Mon_054_158_010623	S42/S44	Email	It is unclear why, in Section 8.8.3.36, the Popper et al., (2014) guidelines have not been referred to, or which values have been used as the threshold for harm. NRW (A) also note that despite the overlap with spawning habitat for several IEFs(some also listed as SPIs) they have not been considered, given the potential for overall effects to the population from a combination of injury/mortality, behavioural effects and loss of eggs/larvae. NRW (A) advise that in the final ES the metric used for assessing impacts to fish eggs/larvae is clarified and a clear and complete assessment presented, which will allow the overall effect on the receptor population to be considered.	Effects of piling on eggs and larvae (i.e. mortality and injury) have been considered in section 3.9.3.20 et seq. within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement, with specific reference to the Popper et al., (2014) guidelines. Further, a summary of the sensitivity assessment is presented in paragraph 3.9.3.53. It should be noted, that there is limited evidence on the effects of piling on fish eggs and larvae, although the best available evidence and industry best practice guidance has been used to support the assessment.	No
Mon_054_159_010623	S42/S44	Email	As described above, NRW (A) agree with the assessment of cod in Sections 8.8.3.38 –39, being of medium sensitivity to underwater noise, however, we do not agree with herring being assessed as of medium sensitivity.	The sensitivity of herring for the underwater sound impact assessment has been reviewed in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement and herring have been upgraded to high sensitivity for mortality and injury.	No
Mon_054_160_010623	S42/S44	Email	It is unclear in Section 8.8.3.43 Diadromous species responses—behaviour, why in this section the Popper et al.,(2014) guidelines have not been referred to, or which values have been used as the threshold for harm. In these guidelines recommendations are made for the metrics and thresholds to be used based on a thorough review of the available evidence base. Metrics such as Root Mean Square (RMS, which gives an average noise exposure) and thresholds based on fish behaviour in enclosed environments are cautioned against in the guidelines	The sensitivity of diadromous fish has been reviewed and updated within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_054_161_010623	S42/S44	Email	NRW (A) note in Section 8.8.3.44that the Piper et al., (2019) study was done on adult seaward migrating eels, rather than juveniles. European eels are most likely to be transient within the array area, either as emigrating adult silver eels on their way to spawn in the Sargasso sea, or as recently metamorphosed juvenile glass eels migrating back to freshwater and coastal areas.	The sensitivity of European eel has been reviewed and updated in section 3.9.3.65 within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_054_162_010623	S42/S44	Email	With reference to Section 8.8.3.45, Although shad have been recorded in Liverpool Bay, NRW (A) are not aware of any rivers supporting allis or twaite spawning populations in north Wales. In addition, NRW (A) note that the migration period for shad are the time frames for the migration into rivers which supports spawning populations and therefore not the months during which shad may spend in the array area. In the final ES, NRW (A) recommend that this is considered when assessing the magnitude of effect from underwater noise to the species.	The sensitivity of Shad has been reviewed and updated in section 3.9.3.67 within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_054_163_010623	S42/S44	Email	NRW (A) advise in Section 8.8.3.47, that shad should be assessed as having high sensitivity to underwater noise, based on them having high vulnerability as group 4 hearing fish of national importance and with low to medium recoverability.	The sensitivity of herring for the underwater sound impact assessment has been reviewed in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement and shad have been upgraded to high sensitivity for mortality and injury.	No
Mon_054_164_010623	S42/S44	Email	Sections 8.8.3.58 –61 Significance of effect, set out the significance of effects from underwater noise to marine fish. As outlined above, NRW (A) are unable to agree with the assessment and have provided detailed advice above on how the final ES should be revised to address our concerns.	The assessment of the impacts of underwater sound on fish and shellfish receptors has been reviewed in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement.	No





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Mon_054_165_010623	S42/S44	Email	NRW (A) agree with the assessment in Section 8.8.4.13 Sensitivity of receptor, Marine species, that juvenile fish are more likely to be affected by habitat disturbance and increased Suspended Sediment Concentrations (SSC). Despite this and the large overlap with spawning and nursery habitats of many species including spurdog, cod and flatfish, the significance of the effect to all marine species (Section 8.8.4.24) is assessed as being of minor adverse. In line with our comments made above on assessing temporary habitat loss/disturbance, NRW (A) advise that further consideration should be given to quantitatively assess impacts from SSC in the final ES.	associated deposition have been reviewed Volume 2, chapter 3:	No
Mon_054_166_010623	S42/S44	Email	Volume 2, Chapter 8, Section 8.10 Cumulative effects assessment NRW (A) is of the opinion that given the very large spatial scale of the Mona development, there is a potential risk of population scale effects, especially when considered in terms of synergistic and/or cumulative effects from other projects and pathways. As detailed above NRW (A) do not agree with how some impacts have been assessed, nor with the final significance of effects from some impacts. Consequently, NRW (A) are unable to agree overall with the assessment of cumulative impacts from the Mona proposal.	The cumulative effects assessment have been reviewed in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_054_167_010623	S42/S44	Email	In particular, NRW (A) are concerned that the impacts from underwater noise when assessed in combination with other Tier 1 and 2 offshore wind farms, only considers direct mortality and injury ranges, and behavioural effect at the qualitative high-level ranges. In the absence of a quantitative assessment for behaviour from Awel y Môr scenario using areas/ranges for TTS could have been used to provide an indication of the risk of population scale effects. In addition, despite the advice from NRW (A) and several other key consultees that spawning fish, such as herring and cod should be considered as static receptors for noise, fleeing and reliance on soft-start and ramp-up procedures are still considered in the cumulative assessment.	As the soft-start and ramp up process will be engaged for marine mammal mitigation on the Mona Offshore Wind Project, it is therefore not considered appropriate to discount this in the underwater sound modelling to ensure a realistic scenario is presented. Soft starts also reduce the instantaneous sound entering the marine environment from background levels. It is acknowledged that some fish species will benefit from this measure, and others will not. Based on this, fish will be presented as both static and fleeing receptors in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement, with the reality likely somewhere in-between the two. Fish will still be subject to all sounds present in the water column. As such the impacts on the fish of these phases have been modelled for both static and moving receptors.	No
Mon_054_168_010623	S42/S44	Email	In terms of other project impacts, the cumulative temporary habitat loss /disturbance in the fish and shellfish study area from Mona/Morgan project, plus Tier 1 and 2 offshore wind farm projects can be estimated as ~217 km2(Mona ~130 km2, Morgan 87 km2and Awel y Môr~10 km2). Despite this, impacts to fish species such as sandeel and herring who are substrate dependent, is assessed as minor adverse effects based on effects being temporary. NRW (A) note, however, that although the effect may be temporary, recovery could still take several years and all of the OWFs have a narrow construction timeframe of 2026-2030 so impacts to fish are likely to happen either simultaneously or consecutively.	The cumulative effects of the impact of temporary habitat loss in the fish and shellfish study area have been reviewed in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement. The Mona Project Design has been refined with considerable reductions in the maximum design scenario for temporary habitat loss from the PEIR. It should also be noted that the total habitat loss will not occur across the area, rather any disturbance to seabed sediments would only affect a small proportion of this area at one time, with recovery of the seabed and associated with populations occurring quickly following construction operations. The conclusions of the assessment remain at minor adverse significance of effect.	No
Mon_054_169_010623	S42/S44	Email	NRW (A) strongly advise that in the final ES further consideration and assessment is made of the potentially large spatial and temporal cumulative population scale effects of direct disturbance to fish habitats in combination with indirect effects through underwater noise	The cumulative effects of the impact of underwater sound have been reviewed in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_054_170_010623	S42/S44	Email	With reference to Section 8.12 Inter-related effects, as detailed above NRW (A) do not agree with how some impacts have been assessed and with the final significance of effects from some impacts. Consequently, we are also unable to agree overall with the assessment of Inter-related effects from the Mona proposal.	Inter-related effects have been reviewed in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_054_171_010623	S42/S44	Email	With reference to Section 8.13 Summary of impacts, mitigation measures and monitoring, NRW (A) advise that in the final ES, mitigation is considered to either control the noise through deployment of bubble curtains, or timing restrictions to avoid impacts to spawning fish from underwater noise.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. Appropriate mitigation measures have been	Yes



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				considered where necessary following assessment of the impacts of underwater sound from pile driving based upon the revised modelling outputs in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement. The project has concluded that there may be a significant effect on herring spawning for the project alone and on cod and herring spawning cumulatively as a result of piling. The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. Timing restrictions and noise abatement systems will be considered as part of a stepped strategy post consent and following the mitigation hierarchy avoid, reduce, mitigate. Project refinements and potential mitigation options will be considered within the Underwater Sound Management Strategy (UWSMS), an outline of which has been submitted with the application, discussed and agreed with stakeholders.	
Mon_054_449_010623	S42/S44	Email	Clarification is sought in Table 1.51Measures adopted as part of the project which are relevant to the assessment of adverse effect on European sites designated for Annex II diadromous fish features from underwater sound, on whether there will be continuous piling of 24hrs+, and if so, mitigation should be put in place that would allow a window of undisturbed movement for migrating fish.	The maximum design scenario assessed is based upon up to 20.5h of active piling per day, thus allowing a window for movement by migratory fish. Further, site specific underwater sound modelling demonstrates that piling will not lead to barrier effects between the Mona Array Area and the coast of the UK and therefore migration to/from relevant freshwater habitats (including Special Areas of Conservation) will not be adversely affected	Yes
Mon_056_001_010623	S47	Email	West Coast Sea Products Ltd along with the SWFPA and SFF at the earlier consultation stage provided full information on where our fishing vessels operate within the Mona lease area to target our primary species Queen Scallops and also King Scallops. This was communicated via Teams meetings and the face-to-face meeting in Kirkcudbright in 2022. Just prior to Christmas2022 the developer provided a solution to enable continuity of the Queen Scallop fishery within Mona and enable coexistence between renewables and dredging for Queen Scallops and King Scallops. This provided some degree of reassurance that the developer was taking coexistence seriously as well as a north to south inter cable array layout adjacent to the typical towing direction with the tides in this area of the Irish Sea.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a scallop mitigation zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of inter array cables in a north to south alignment, as far as possible to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_056_002_010623	S47	Email	With regards to Mona our thoughts are still of the same understanding following this meeting and that the developer honours a plan of coexistence with the Queen Scallop fishery–i.e. the 5-6kmwide corridor with limited cable crossings through the middle of the lease area, i.e. as per Figure 1.21of Volume 6, annex 8.1: Fish and shellfish ecology technical report. We trust at the next stage that the developer- shall hold discussions and engagement regarding micro-siting of turbines where inclose proximity to where we fish. Provided below is where we concentrated our effort within Mona 2022-23	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a scallop mitigation zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the	Yes



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			season in line with the latest survey area we have for Mona. The fishing effort is no different to what has been provided to the developer so to date at the 2022stakeholder engagement; although most of our fishing took place typically within a 5-10km box as shown below in yellow VMS dots and limited the northern extents within the lease area where historically catches rates are highest. The green VMS dots show King Scallop VMS activity for 2022-23 season in this area.	positioning of inter array cables in a north to south alignment, as far as possible to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_056_003_010623	S47	Email	We have the following comments to make regarding specific offshore features of the Mona windfarm project which would enable our operations to potentially coexist: -	The Applicant notes your response.	No
Mon_056_004_010623	S47	Email	We would prefer as much development of turbines and inter array cables away from where we fish as per the above map showing VMS activity. Positioning of turbines on top of specific tows or running a cable through a tow would be seen as a missed opportunity and irreversible needless loss when it may be a case of running the cable of fixing a turbine only a small distance away. Again we would welcome the same continued involvement with the developer in the next stage and particularly a corridor through the middle of the development north to south where the Queen Scallop ground is commercially fished	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a scallop mitigation zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of inter array cables in a north to south alignment, as far as possible to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_056_005_010623	S47	Email	Inter cable arrays –as much north-south routing as possible to enable north-south towing	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to provide an update to stakeholders on the Mona array layout principles, this included the commitment to positioning inter array cables away from tows and in a north to south alignment, as far as possible, to facilitate co-existence. This is detailed within the Mona Layout Principles Statement within the Environmental Statement. The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and	Yes



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				monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_056_006_010623	S47	Email	We would encourage that a tightly packed turbine boundary is employed in the project design and the largest available fixed turbines are used which may be 18-20mwtoreduce the number of turbines needed.(a) the perimeter is not of too much interest to us and (b) would reduce the no. turbines required inside and enable more room for the fishing vessels to move. Dogger Bank B for instance comprises of 1 mile distance perimeter turbines and inside the turbines are some 2-3miles apart. A 1mile distanced boundary would enable safe steaming access for the fishing vessels to and from the fishing grounds that fall within Mona.2mile distancing of turbines within along with a dedicated avoidance of the key Queen Scallop fishing grounds (yellow VMS dots) as indicated in the Figure above would provide greater confidence of continuity of our industry.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a scallop mitigation zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of inter array cables in a north to south alignment, as far as possible to help facilitate co-existence of commercial fisheries activity within the Mona Array Area.	
				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_056_007_010623	S47	Email	Cable burial. The consultation documents inform that the developer is wishing toachieve1m burial which eliminates potential snagging with fishing gear. However we have concerns that the developer may use rock burial or mattress where appropriate, i.e. when crossing points with other existing cables We would not be overly concerned where this does not affect our fishing patterns, e.g. perimeter or to the east or west, however would be detrimental to the sandy gravelly Queen Scallop beds. Scallop vessels have also paid witness to this with recently completed projects such as Moray east where rock dumping has been excessive. We would urge that as per the Figure provided in this response above that cable burial closely ties in with the surrounding gravelly substrate sea bed like for like.	Cable protection will only be used where sufficient trenching depths cannot be achieved. There is a commitment not to place any cable protection in Constable Bank (an Annex 1 habitat outside of a designated site), to minimize cable protection within the Menai Straights and Conwy Bay SAC, and to use trenchless techniques at the landfall so no cable installation will be required in the intertidal area above seabed level. In nearshore areas the use of cable protection will be minimised. A Cable Specification and Installation Plan will be produced which will outline measures such as appropriate cable trenching depths to minimise cable exposure and stranded assets and will be secured through the deemed marine licence and the standalone marine licence. Further detail on cable protection measures can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement and details on cable protection can be found in Volume 1, Chapter 3: Project description.	Yes
Mon_056_008_010623	S47	Email	Access to fishing during construction. The consultation documents outline that a 500m exclusion zone around works maybe operated up to 4 years. During construction of the project the greatest risk to our business is no access to fish as a result of the proposal for a 500m clearance of construction activities associated with turbine installation and inter-array cables. We concentrate 75% of our annual effort approx. within specific small areas of the Mona and Morgan windfarm areas therefore our fishing and processing business would be significantly impacted. We would encourage that the project adopts a phased approach, this may enable a degree of access to continue. If a corridor is to be provided in line with the Queen Scallop fishery as discussed in earlier consultation then we would regard that construction of the project would have a reduced impact on our operations.	During construction of the Mona Offshore Wind Project, rather than complete closure of the Offshore Development Areas, it is proposed that temporary 500m safety zones will be present around wind turbines and OSPs where works are underway. It is proposed that rolling advisory exclusion zones of 500m will also be present around vessels installing inter-array cables, interconnector cables and subtidal export cables. The loss or restricted access to fishing grounds created by such exclusion zones will be gradual as the presence of infrastructure increases. Temporary restrictions to fishing activity and/or anchoring, will also be required in areas where full cable burial to target depth has not yet been achieved and/or surface-laid cable exists (prior to cover by external cable protection). In such areas of temporarily shallow-buried/surface-laid cable, the restricted areas will be monitored by Guard Vessels. The loss or	





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				restricted access to fishing grounds is assessed within Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement.	
				A Cable Specification and Installation Plan will be produced which will outline measures such as appropriate cable trenching depths to minimise cable exposure and stranded assets and will be secured through the deemed marine licence and the standalone marine licence. Further detail on cable protection measures can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement and details on cable protection can be found in Volume 1, Chapter 3: Project description.	
Mon_056_009_010623	S47	Email	Fish and shellfish ecology (see Chapter 8 of our PEIR)Review of Volume 2, chapter 8: Fish and shellfish ecology does not provide much comfort with some of the statements and assessment of impacts made in such as section 8.8.3.53, 8.8.3.57, 8.8.5.1 and 8.8.5.13. We do not agree with the assessment and often downplays and insinuates that only a small proportion of the Queen Scallop habitat is situated within Mona, i.e. Section 8.8.5.13 - "Long-term loss of habitat directly around the cables and wind turbines represent only a very small proportion of habitat within the fish and shellfish ecology study area, and so are unlikely to cause significant impacts on the wider scallop populations."	The magnitude of impact and sensitivity of queen scallop to long term habitat loss has been reviewed and updated in section 3.9.5.15 Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement and within Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement. This has considered additional evidence relating to impacts to scallops since PEIR drafting and project design envelope refinements which have reduced many of the maximum design scenarios with respect to seabed disturbance.	Yes
Mon_056_010_010623	S47	Email	Following construction we are anxious and uncertain whether Queen Scallops shall still wish to spawn and gather in vast dense numbers like we see at the present on the sandy gravelly ground. The fact is that the report is not fit for purpose in its assertive statements and assessments on Queen Scallop ecology as no windfarms have ever been constructed on Queen Scallop habitats to date, particularly with Mona and Morgan projects which will be situated on the most prominent and productive strip of Queen Scallop ground in Europe.	Further literature sources have been reviewed and included in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement where available to support the evidence base defining the sensitivity of queen scallop. The assessment parameters have reviewed, and relevant measure have been considered.	Yes
Mon_056_011_010623	S47	Email	We are in the infancy of understanding the impact of wind turbines on shellfish habitats. We may find ourselves in a situation where we can operate with sufficient room between turbines, however the important Queen Scallop beds may be lost for us in the future	Further literature sources have been reviewed and included in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement where available to support the evidence base defining the sensitivity of queen scallop. The assessment parameters have reviewed, and relevant measure have been considered.	Yes
Mon_056_012_010623	S47	Email	Commercial fisheries (see Chapter 11 of our PEIR) The commercial fisheries chapter provides mention to the Queen Scallop fishing grounds following information provided by myself last year in face to face meetings, via online virtual meetings and information submitted by email. We are in disagreement with several impact assessments made on "Scallop vessels –Scottish west coast" which we regard as ourselves as a receptor in the report. The impact during construction and operation on the Queen scallop commercial fishery is considered as negligible—moderate in the report throughout which we do not agree within general. If the development enables a corridor of fishing, along with situating turbines and cables where our fishing vessels do not tow gear and situated in a north-south direction then we would regard that there would be a more minimal impact. However worse case if there is no desire by the developer for coexistence with our operations and, then there is the potential for us being omitted from the fishery entirely in which case our business would cease with our Queen Scallop fishing, processing and supply chain.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a scallop mitigation zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of inter array cables in a north to south alignment, as far as possible to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing	
				consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and	





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				monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_056_013_010623	S47	Email	We generally do not agree with the statements made in the report where by "Scallop vessels – Scottish west coast" are regarded as spatially adaptive, nor does the report acknowledge the spatial squeeze crisis in fishing access at present or at least acknowledge the cumulative effects of potentially losing access to prime Queen Scallop grounds within Morgan. The assessment in this regard is invalid in considering the cumulative losses.	Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement has been updated to reflect this. The sensitivity description has been amended to reflect the limited spatial adaptability for this receptor group. Cumulative effects are considered within the cumulative effects assessment section of Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement. This section considers the potential effects associated with spatial squeeze when assessing the Mona Offshore Wind Project cumulatively with other relevant plans and projects.	Yes
Mon_056_014_010623	S47	Email	Do you have comments on how the project could support and work with local, regional and national communities and the economy? Should the development proceed without any coexistence concepts such as space to fish as discussed at consultation meetings or a north-south corridor leaving the Queen Scallop ground free of development, then there shall be no community benefits to our community of Kirkcudbright within Dumfries and Galloway who have been relying on the fishing ground with Mona for over 50 years.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan. The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	t
Mon_056_015_010623	S47	Email	The only recommendation of how this project could support and favour our local community, the 130 employees and fishermen we employ and other businesses which feed off of us, is to follow the design recommendations we have provided in this report in addition to our consultation responses last year and meetings to date. Our consultation to date has been reasonably proactive and we wish for this to continue as the project progresses.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a scallop mitigation zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of inter array cables in a north to south alignment, as far as possible to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan	





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				has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_056_016_010623	S47	Email	4. Do you have any comments / feedback on how we have understood the technical and environmental constraints of the areas offered to us by the Crown Estate as part of its leasing process? This work informed our decision to locate Mona Offshore Wind Project at the proposed wind farm site. The constraints which were analysed and considered included water depths, wind capacity, wave height, seabed conditions, and the location of possible onshore connection and marine port facilities (among other things). See Volume 1 of our PEIR, Introductory Chapters, chapter 3: Project Description. It is disappointing that little regard has been given to the fishing industry by the Crown estate in the leasing process, particularly the Scallop industry, in the selection of the Mona site. If the development was located some 6-7miles east for instance the proposal would still be located in an area of the Irish Sea with sufficient wind, and could have easily avoided our fishing operations and not threaten continuity of our proud traditions.	Comments regarding the Crown Estates recognition of commercial fisheries activity, as much as a potential constraint on site selection as other parameters such as water depth; wind capacity and seabed conditions, are noted. However, it has been an important factor considered by bp/EnBW to inform the site selection of the array area, and associated design commitments. Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan.	Yes
Mon_062_010_020623	S47	Email	·	The magnitude of impact and sensitivity of queen scallop to long term habitat loss has been reviewed and updated in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_062_011_020623	S47	Email	Section 8.8.5.13 -"Long-term loss of habitat directly around the cables and wind turbines represent only a very small proportion of habitat within the fish and shellfish ecology study area, and so are unlikely to cause significant impacts on the wider scallop populations." Following construction, the SFF are anxious and uncertain whether Queen Scallops shall still wish to spawn and gather in vast dense numbers like we see at the present on the ground. The fact is that the report is not fit for purpose in its assertive statements and assessments on Queen Scallop ecology as no windfarms have ever been constructed on Queen Scallop habitats to date, particularly with Mona and Morgan projects which will be situated on the most prominent and productive strip of Queen Scallop ground in Europe.	Further literature sources have been reviewed and included in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement where available to support the evidence base defining the sensitivity of queen scallop. The assessment parameters have reviewed, and relevant measures have been considered within Volume 2, chapter 3: Fish and shellfish ecology and Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement.	Yes
Mon_062_012_020623	S47	Email	We are in the infancy of understanding the impact of wind turbines on shellfish habitats, therefore we may find ourselves in a situation where our members can operate with sufficient room between turbines, however the important Queen Scallop beds may be lost in the future.	Further literature sources have been reviewed and included in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement where available to support the evidence base defining the sensitivity of queen scallop. The assessment parameters have reviewed, and relevant measures have been considered within Volume 2, chapter 3: Fish and shellfish ecology and Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement.	Yes
Mon_066_036_020623	S42	Email	We recommend that a Statement of Common Ground (SoCG) is started by the Applicant early within the EPP, to accurately catalogue all areas of agreement for the project and highlight any areas of disagreement. ETG consultation/agreement logs have been successfully used by other projects as the foundation for the SoCG.	The Applicant will develop Statement of Common Ground with all key stakeholders during the examination phase.	No





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Mon_066_037_020623	S42	Email	Best Practice Advice for Offshore Wind Natural England has produced a series of documents to provide Environmental Assessments: Best Practice Advice for Evidence and Data Standards for offshore wind farm development in English inshore and offshore waters. The advice is provided in a series of documents which range from baseline characterisation surveys and pre-application engagement, through to expectations at application and post-consent monitoring.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_038_020623	S42	Email	The project is divided into four phases: Baseline characterisation surveys Pre-application engagement and the evidence plan process Data and evidence expectations at examination Post-consent monitoring and other environmental requirements.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_039_020623	S42	Email	The above link also provides access the Nature Conservation Considerations and Environmental Best Practice for Subsea Cables for English Inshore and UK Offshore Waters. This project provides Natural England and JNCCs joint environmental best practice advice for subsea cable projects in English inshore and UK offshore waters.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_040_020623	S42	Email	It is the expectation that developers follow our Best Practice through the application and consenting process. As such our advice and recommendations to the PEIR are framed around this advice.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_041_020623	S42	Email	If you have any issues using SharePoint Online, please contact the site owners or contact: REDACTED	The Applicant notes your response.	No
Mon_066_044_020623	S42	Email	Natural England's Structure/Framework for Attributing Risk. The comments provided within this letter and its Annexes have been colour coded using the structure/framework as specified in the risk table in Appendix I of this letter. In this letter, the coloured headings are coded based on the highest risk associated with the topic in question. Natural England would like to highlight that at this stage all comments highlighted as yellow, amber, or red need to be addressed, with the potential for these issues to become more significant if not resolved at application.	The Applicant notes your response.	No
Mon_066_045_020623	S42	Email	Impacts on the Natural Environment–Natural England's Key Concerns Generic Issues - MARKED RED BASED OFF THEIR APPENDIX Natural England highlights that for several receptors, the PEIR is based on incomplete data (offshore ornithology, marine mammals) or refers to additional data collection that is not presented or still to be carried out (physical processes, benthic ecology). Natural England cannot therefore make any conclusive judgements based on this PEIR, including the cumulative/in-combination assessments and the HRA. Accordingly, our advice focuses on the methodology used. We emphasise the need to base the submitted ES on robust datasets that meet (and where appropriate exceed) minimum standards, for example marine mammal and offshore ornithology impact assessments should be based on at least 24 monthly surveys.	The Environmental Statement has been based on robust datasets that meet/exceed minimum standards. For marine mammals and offshore ornithology assessments, two years of aerial survey data is presented and analysed (Volume 2, Chapter 4: Marine mammals chapter; Volume 2, Chapter 5: Offshore ornithology chapter). The benthic and physical processes assessments have been informed by 2022 and 2023 intertidal surveys, and 2021 and 2022 subtidal benthic surveys (Volume 2, Chapter 1: Physical processes chapter; Volume 2, Chapter 2: Benthic subtidal and intertidal ecology chapter).	No
Mon_066_046_020623	S42	Email	We also highlight the risks associated with further data processing to validate the conclusions and having sufficient time to consult pre-application and sufficiently resolve matters prior to submission. We reserve the right to change our comments and position during the ES consultation, subject to the outcome of further data analysis. Furthermore, Natural England seeks confirmation that the timetable set out for DCO submission allows for evidence standards to be met.	Noted. The Applicant confirms that the timetable set out for DCO submission allows for evidence standards to be met.	No
Mon_066_047_020623	S42	Email	Please note that Natural England defer to Natural Resources Wales as the relevant statutory consultee in some instances. This is reflected by the use of a Purple RAG rating in our advice.	The Applicant notes your response.	No
Mon_066_048_020623	S42	Email	Physical Processes, Benthic Ecology and Fish Ecology - MARKED PURPLE BASED OFF THEIR APPENDIX Natural England notes that many of the thematic areas require additional monitoring, surveys and data analysis prior to submission We highlight the risks associated with further data processing to validate the conclusions made in the PEIR. In particular that we are unable to advise on the potential scale and level of risk this project may pose to nature conservation during this consultation. Additionally, it is unclear to Natural England how this project will progress towards submission and ensure there is sufficient time to incorporate the outstanding data which is needed to validate conclusions made in the PEIR, and inform the Environmental Statement (ES).	The Benthic subtidal and intertidal ecology technical report of the Environmental Statement has been updated to include the results of the site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Array Area Zol and the Mona Offshore Cable Corridor, including within Constable Bank and the Menai Strait and Conwy Bay SAC, and the intertidal survey undertaken in 2022 and 2023. The updated Benthic subtidal and intertidal ecology technical report of the	Yes





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				Environmental Statement was submitted to the SNCBs via the Benthic Ecology, Fish and Shellfish and Physical Process EWG on 2 October 2023 (i.e. ahead of the final application) for comment. The results of the 2022 and 2023 surveys (i.e. the IEFs identified) have been carried through to, and assessed fully in, the Benthic subtidal and intertidal ecology chapter of the Environmental Statement.	
Mon_069_014_010623	S42	Email	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.	Comment noted and the information in the MMEA has been referenced in the Benthic subtidal and intertidal ecology technical report of the Environmental Statement to characterise the wider regional benthic subtidal and ecology study area. The MMEA is further referred to within Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement, and Volume 2, Chapter 4: Marine mammals of the Environmental Statement and Volume 6, Annex 4.1: Marine mammals technical report of the Environmental Statement (3.4 (a) Marine Mammals - Cetaceans and 3.4 (b) Seals).	No
Mon_069_020_010623	S42	Email	Chapter 7 Benthic Subtidal and Intertidal Ecology Table 7.24, 7.25 (throughout this chapter and elsewhere, including Fish and Shellfish Ecology) For the Isle of Man projects listed below; Douglas Harbour, Isle of Man Castletown Bay, Isle of Man –not aware of this as a current operation	Comment noted and in the absence of a confirmed position on whether these dredging projects in the Isle of Man are active, they have been included on a precautionary basis in CEA in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and the CEA in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement	No
Mon_069_021_010623	S42	Email	Has IoM Government (Department of Infrastructure) (DoI) been consulted on the details and assumptions related to the above projects? It is not clear whether these projects are active, or that the correct quantities or assumptions about waste disposal sites have been made. Recommend clarification with DoI.	Comment noted and in the absence of a confirmed position on whether these dredging projects in the Isle of Man are active, they have been included on a precautionary basis in CEA in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and the CEA in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement	No
Mon_069_025_010623	S42	Email	Chapter 8 Fish and Shellfish Ecology Technical Report Table 1.1: Summary of key desktop reports Suggest that the baseline characterisation is missing the following; Bangor University (Reports, publications etc.) hiip://sustainable-fisheries- iom.bangor.ac.uk/communications.php.en In particular; Isle of Man Government Reportshiip://sustainable-fisheries- iom.bangor.ac.uk/government-reports.php.en For example: Scallop stock survey 2022 hiip://sustainable-fisheries-iom.bangor.ac.uk/documents/government- reports/scallop/2022/SCESurveyReport2022_Final.pdf Queen scallop stock survey 2022·hiip://sustainable-fisheries- iom.bangor.ac.uk/documents/government- reports/scallop/2022/QSC_StockAdvice_Report_2022_Final.pdf	These information sources have been reviewed for inclusion within Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement as appropriate.	No
Mon_069_026_010623	S42	Email	These surveys include stations in the eastern Irish Sea that are co-surveyed by AFBI, as part of their annual scallop surveys, and which are summarised in the ICES Working Group, ICES. 2021. Scallop Assessment Working Group (WGScallop). ICES Scientific Reports. 3:114. 106 pp. hiips://doi.org/10.17895/ices.pub.9561: ·hiips://archimer.ifremer.fr/doc/00743/85501/90612.pdf AFBI may be able to provide additional details on their Irish Sea scallop surveys.	These information sources have been reviewed for inclusion within Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement as appropriate.	No





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Mon_069_027_010623	S42	Email	1.4.2.22and Figure 1.3should include the Orsted Isle of Man wind farm project: hiips://orsted.co.uk/insights/future-developments/isle-of-man	The Isle of Man OWF has been included within the CEA for Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement as a Tier 2 project.	No
Mon_069_028_010623	S42	Email	1.9.2.1Both king scallop and queen scallop show a preference for areas of clean firm sand, fine or sandy gravel and may occasionally be found on muddy sand, often in high densities (MarLIN, 2022). While king scallop are generally found in sandy, gravelly substrates, they can additionally be found in coarser sediments. King scallop achieve reproductive maturity between three to five years of age, live upwards of 15 years, and are evidenced to be most abundant in depths of 20m to 70m (Cappell et al., 2018; Howarth and Stewart, 2014; Salomonsen et al., 2015). Queen scallop are known to have particularly important commercial grounds located around the Isle of Man and can be found in depths of up to 100m and are specifically protected against unlicenced towed gear fishing under Isle of Man byelaws (SD 2018/0186, 2018). This is correct, but it seems odd to highlight only queen scallop, when both species are similarly protected, and, to highlight Marine Nature Reserves legislation, when there is a wide range of fisheries legislation and management measures in place for both species in Manx waters, including seasonal closures, closed areas and other technical-based conservation measures.	Isle of Man fisheries legislation and management measures have been reviewed and included as appropriate within Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement. The importance of scallops to commercial fisheries has been acknowledged both within this Chapter and the Volume 6, Annex 6.1: Commercial fisheries technical report of the Environmental Statement and considered throughout the impact assessments.	Yes
Mon_069_029_010623	S42	Email	In addition, unlicensed fishing of any kind, regardless of species, is vigorously enforced in Manx waters. See; hiips://www.gov.im/about-the-government/departments/environment-food-and-agriculture/environment-directorate/fisheries/sea-fisheries/legislation-policy-guidance/for details.	Noted. The Isle of Man fisheries legislation and management measures have been reviewed and included as appropriate within Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_069_030_010623	S42	Email	Suggest a broader recognition of fishery conservation measures, and highlight the MNRs, which are primarily for to protect scallop and queen scallop spawning and nursery interests, as appropriate.	Isle of Man fisheries legislation and management measures have been reviewed and MNRs have been included as appropriate within Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_069_031_010623	S42	Email	1.9.2.5King scallop have historically been targeted commercially through dredge fisheries within the vicinity of the Mona Offshore Wind Project, with the majority of the activity concentrated along the western portions of the Mona Array Area and around the Isle of Man (Figure 1.20). Agree with this general characterisation of the SCE fishery.	The Applicant notes your response.	No
Mon_069_032_010623	S42	Email	1.9.2.6 While the value of landings has fluctuated over the last 10 years, high intensity scallop dredging is present along the western-most corner and through the middle of the Mona Array Area (Figure 1.21). Other areas around and within the Mona Offshore Wind Project and Mona Array Area are rarely fished as they are considered important spawning grounds for the overall stock. Specifically, these areas are located within the western and easternmost portions of the Mona Array Area (Figure 1.21). Strongly disagree with this highly-selective characterisation of the QSC fishery.	The queen scallop fishery information presented in the PEIR is based upon feedback from direct consultation with the fishing industry. Further input has been sought for inclusion within Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement through further consultation.	No
Mon_069_033_010623	S42	Email	Why treat the species differently in a regional context? As recognised in the report, queen scallops are a vital component of the Manx fishing industry between July and October-but comparison of Figures 1.20 and 1.21 might suggest that QSC only occurred in the array area, and was not important elsewhere. However, the baseline is assessed, it must present equivalent information to provide assurance that all species have been appropriately considered.	The queen scallop fishery information presented in the PEIR is based upon feedback from direct consultation with the fishing industry. Further input has been sought for inclusion within Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement through further consultation.	No
Mon_069_034_010623	S42	Email	This is important as spawning and settlement connectivity of commercially-important scallop species within the Irish Sea is assumed, and so effect on queen scallop populations within the array area may affect settlement of larvae further north, and particularly around the Isle of Man. See Figures, 6c, 6d, 7c, 7d, 9c, 9d, 11c, 11d in 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 &	The queen scallop fishery information presented in the PEIR is based upon feedback from direct consultation with the fishing industry. Further input has been sought for inclusion within Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and Volume 2, Chapter 3: Fish	No





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			Conservation report No. 3, Bangor University. Pp. 25: hiip://sustainable-fisheries-iom.bangor.ac.uk/documents/government-reports/scallop/2008/BangorFisheriesReport_No3.pdfFigure 1.21requires a more regional presentation of queen scallop fishing activity, noting that fishing in Manx waters is by otter trawl and not dredge, and so the assessment must display and consider both gear types.	and shellfish ecology of the Environmental Statement through further consultation.	
Mon_069_036_010623	S42	Email	Queen and king scallop: fishing activity maps based on EU VMS data (2018-2022) from Citrix (available from MMO) merged with Nest Forms data (held by DEFA, IoM Government). Alternatively, EU logbook data from Citrix (available from MMO) could be used in place of Nest Form data.	The Applicant notes your response. The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	No
Mon_069_037_010623	S42	Email	1.10 Designated sites Table 1.8 Summary of Designated Sites within the fish and shellfish ecology study area and relevant qualifying interest features. Refer to: hiips://www.gov.im/mnrhiips://www.gov.im/media/1362728/mnr-designation-order-2018-300920.pdfhiips://www.gov.im/media/1362727/manx-marine-nature-reserves-byelaws-2018-sd-2018-0186-300920.pdfhiips://www.gov.im/media/1378920/designation-of-marine-nature-reserves-guidance-note.pdf)	MNR references have been updated with Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement.	No
Mon_069_038_010623	S42	Email	It is not clear why the Table has included only 4 of the Manx MNRs, when all 10 are within the FSE Study area, and all feature at least one species of relevance, and are included in Figure 1.22.	MNR references have been updated with Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement.	No
Mon_069_039_010623	S42	Email	Figure 1.22 also requires changing-the MNR names are in the wrong place in some cases. For example, Baie ny Carrickey is missing and Little Ness is on the wrong side of the island (see also text comment below). See below for correct version.	MNR references have been updated with Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement.	No
Mon_069_040_010623	S42	Email	1.10.12.1Little Ness MNR is located on the east coast of the Isle of Man, in the Irish Sea. Please amend accordingly.	MNR references have been updated with Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement.	No
Mon_069_041_010623	S42	Email	Table is missing the following; Langness MNR: Modiolus and Iceland clam, European eel, cod spawning/nursery ground Baie ny Carrickey MNR: European eel, spiny lobster Calf of Man and Wart Bank MNR: sand eel, spiny lobster, flame shell Port Erin Bay -see features Niarbyl Bay -see features West Coast MNR -see features Sand eel should also be included for Ramsey Bay MNR	MNR references have been updated with Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement to include those highlighted.	No
Mon_069_042_010623	S42	Email	Please amend and update/consider where relevant in the text e.g. Section 1.10.10, and associated PEIR Chapter 8 Fish and Shellfish Ecology.	MNR references have been updated with Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement.	No
Mon_069_043_010623	S42	Email	1.11.1.2 Diadromous fish. (Refer to: hiips://www.gov.im/media/1378920/designation-of-marine-nature-reserves-guidance-note.pdf) There are no Manx MNRs mentioned, despite having diadromous fish as designation features, although recognised as such in Table 1.10.	MNR references have been updated with Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement to include those highlighted	No
Mon_069_044_010623	S42	Email	Chapter 8 FSE PEIR Report Table 8.5 Consultation: June 2022-Isle of Man Government, Department of Infrastructure —Scoping Opinion: Ensure that appropriate consideration is given to designated marine protected sites and their associated species, particularly those protected under Manx law or identified and threatened or declining by the OSPAR Convention. Included within this are king and queen scallop, which are protected in most Marine Nature Reserves (MNRs) around the IoM. Designated sites within IoM territorial waters, and their associated habitats and species of principal importance, have been identified in volume 6: annex 8.1: Fish and shellfish ecology technical report of the PEIR and are listed in section 8.5.3, with the identified IEFs listed in section 8.4.7. As noted above in the Technical Report comments, and at 8.4.6 of the PEIR report —only 4/10 Manx MNRs have been included. As such it's not apparent that the consultation commitment noted in Table 8.5 has been achieved.	MNR references have been updated with Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement to include those highlighted.	No
Mon_069_045_010623	S42	Email	Table 8.6: Summary of key desktop reports. See related comments in Technical Report comments above.	These information sources have been reviewed for inclusion within Volume 6, annex 3.1: Fish and shellfish ecology technical	No





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				report of the Environmental Statement and Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement as appropriate.	
Mon_069_046_010623	S42	Email	8.4.3 Identification of designated sites As noted above, and noting the process of identification outlined, only 4 of ten Manx MNRs were included? As appropriate please amend both TR and PEIR to reflect more comprehensive inclusion	MNR references have been updated with Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement to include those highlighted.	No
Mon_069_047_010623	S42	Email	8.4.2 Baseline environment Please note comment made on the Technical Report above in relation to consideration of Manx interests in the baseline and their subsequent application in Chapter 8.	MNR references have been updated with Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement to include those highlighted.	No
Mon_069_048_010623	S42	Email	8.4.5.12 King and Queen Scallop As noted for Technical report, it's not clear why high levels of fishing for king scallop is acknowledged and presented, yet the equivalent for queen scallop is not? See graphics provided.	These information sources have been reviewed for inclusion within Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement as appropriate. Additional figures showing indicative queen scallop grounds as evidenced through stakeholder consultation is included in Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement. Further additional information is included in Volume 6, Annex 6.1: Commercial fisheries technical report of the Environmental Statement.	No
Mon_069_049_010623	S42	Email	There is acknowledgement of high densities of scallop in Manx waters, but only a very small selected area within the array site is highlighted. This cannot be considered as equivalent presentation of species, although both are highly relevant to both IoM and UK fishers in the region. This should be addressed.	The Applicant notes your response. The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	No
Mon_069_050_010623	S42	Email	See provided maps above for example; Data compiled recently for the Isle of Man Government to show fishing activity (using swept area as a proxy) clearly shows the distribution of these fisheries in Manx waters. An equivalent presentation of queen scallop fishing activity and important areas in adjacent UK waters also seems appropriate, not only for the very limited area of the array. While the technical report and Chapter report's king scallop data is broadly indicative, the queen scallop data is not.	The Applicant notes your response. The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	No
Mon_069_051_010623	S42	Email	8.4.6 Designated sites Table 8.9: Designated sites and relevant qualifying interests for the fish and shellfish ecology chapter. As noted above, this table does not appear to adequately include Manx MNRs, only 4/10 are present, yet features are common and all are within the Study Area. Please amend accordingly or provide explanation for omissions.	MNR references have been updated with Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement to include those highlighted.	No
Mon_069_052_010623	S42	Email	Table 8.10: Defining criteria for IEFs (adapted from CIEEM, 2018). Value of IEF Defining Criteria ·Nationally designated sites: Manx MNRs are designated under the Wildlife Act 1990·Species protected under national law: multiple designation features (species and habitats) of the Manx MNRs are protected under the Wildlife Act 1990. So the rationale for exclusion of some MNRs is not apparent and should be clarified.	MNR references have been updated with Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement to include those highlighted.	No
Mon_069_053_010623	S42	Email	Table 8.10: IEF species and representative groups within the Morgan Generation Assets- 'Herring is an important commercial species, but not in the immediate vicinity of the Mona Array Area or in the wider east Irish Sea. ·Mackerel is an important commercial species, but not in the immediate vicinity of the Mona Array Area or in the wider east Irish Sea.	The baseline characterisation and valuation of IEFs has been reviewed and revised, as appropriate to take into account commercial importance of IEFs in the fish and shellfish study area. These evaluations have been reviewed in Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and updated throughout section 1.4.2, in line with Volume 6, Annex 6.1: Commercial fisheries of the Environmental Statement.	No



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Mon_069_054_010623	S42	Email	These statements are queried, and should ideally be supported by VMS data showing species fishing activity.	These evaluations have been reviewed in Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement with support from the VMS data reported in Volume 6, Annex 6.1: Commercial fisheries of the Environmental Statement.	No
Mon_069_055_010623	S42	Email	The herring statement also appears to contradict Chapter 11 Commercial Fisheries TR, where it indicates the presence of this fishery in the areas. For example; 1.4.1.1 Commercial fishing in the east Irish Sea region has a wide spatial distribution and targets a number of valuable fisheries for demersal, pelagic and shellfish species. Key shellfish species include; king scallop, and queen scallop which are targeted by dredges; and whelk, lobster and crab, which are targeted by pots. The most important demersal target species include bass, sole, thornback ray and plaice, which are typically caught by beam and otter trawlers. Pelagic fish landings from this area are mainly of herring and mackerel, which are predominantly caught by pelagic trawls.	These evaluations have been reviewed in Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and updated throughout section 1.4.2, in line with Volume 6, Annex 6.1: Commercial fisheries of the Environmental Statement.	No
Mon_069_056_010623	S42	Email	Noting Figures 1.14 -1.17 in the FSE Technical Report—where is the actual commercial fishery located within the study area? It's important to understand the interaction between spawning grounds, larval areas and fishing areas in order to determine potential effects. Figures 1.51-1.54 of the Commercial Fisheries Technical Report do not include pelagic trawls, so how do we know where the fishery occurs in relation to the array site? How can an assessment of impact be made if the spatial interaction isn't apparent?	These evaluations have been reviewed in Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement. These have been updated in line with Volume 6, Annex 6.1: Commercial fisheries of the Environmental Statement to ensure the commercial importance of IEFs within the fish and shellfish ecology study area is taken into account within the impact assessments.	No
Mon_069_057_010623	S42	Email	The adjacent Morgan array proposal identified herring fishing within the array area, so given seasonal variability in this stock, it seems unlikely that the surrounding (Mona) area can be dismissed as indicated above, and appears to rely heavily on Coull et al., 1998 as the main reference. Given the acknowledged variability in this species' spawning patterns, further specific consultation on this conclusion with AFBI, as regional herring experts, is recommended.	As recommended, data on herring spawning has been sought from AFBI, alongside site specific and regional seabed sediment data, in order to better define and refine the herring spawning habitats around the Isle of Man, in consultation with the Expert Working Group. It is agreed that Coull et al., 1998 is an old reference and should not be solely relied upon for the purposes of the baseline characterisation. These data have been used to inform the IEF valuations which have been reviewed in Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement	No
Mon_069_058_010623	S42	Email	8.8.4.16:This section raises a number of concerns about how data is presented assessed and concluded. For example; ·Many shellfish species, such as edible crab and king and queen scallop, have a high tolerance to SSC and are reported to be insensitive to increases in turbidity (Wilber and Clarke, 2001);	The baseline and impact assessments have been updated to take into consideration the additional data sources highlighted during statutory consultation This specific example is updated in section 3.9.4, Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement	No
Mon_069_059_010623	S42	Email	This reference relates to a temperate/subtropical American species (<i>Agropecten irradians</i>) in estuarine conditions, and CANNOT be extrapolated to king and queen scallops. 'In the case of possible burial during settlement of SSC, both king and queen scallop have the potential to be impacted negatively. However, it has been found that any potential burial of queen scallop does not negatively impact emergence from sediment and survival rates in the short term of up to two days, with the caveat that they do have the potential to be negatively impacted when buried under several centimetres of sediment over longer time periods, up to seven days (Hendrick et al., 2016).'	The assessments have been updated to take into consideration the additional data sources highlighted during statutory consultation. This specific example is updated in section 3.9.4, Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_069_060_010623	S42	Email	The actual conclusion of this laboratory study was that 'the queen scallop (Aequipecten opercularis)' was 'highly intolerant to burial'. Why not also present the simple point also?	The assessments have been updated to take into consideration the additional data sources highlighted during statutory consultation with section 3.9.4, Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement updated to take this consultation response into account.	No
Mon_069_061_010623	S42	Email	'The MDS modelling of sediment plume movement and deposition depths have shown this is unlikely to occur in this case. King and queen scallop both have high intensity spawning grounds almost fully overlapping the Mona Array Area and are both more mobile than many other shellfish species and are expected to avoid active events causing increases in SSC. This potential avoidance behaviour is	The Applicant notes your response. The assessment of impact on spawning grounds is within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement.	No





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			less prevalent in juvenile king scallop, where burial from up to 5cm of SSC deposition can reduce growth rates, potentially having impacts on future spawning times (Szostek, et al., 2013). However, the relatively low level of SSC and deposition, and the large area available alternatively for spawning, is unlikely to significantly impact king scallop populations in the short or long term'		
Mon_069_062_010623	S42	Email	While these species are relatively more mobile than other shellfish, Szostek et al., 2013, also noted that 'A. opercularis frequently swim short distances (by repeated 'clapping' of the shells) to escape predators, while P. maximus exhibit this behaviour much less frequently and require a longer aerobic recovery time (Brand 2006).'	The Applicant notes your response.	No
Mon_069_063_010623	S42	Email	The research also involved juvenile scallops (30mm) which are more active than adults –so the extrapolated effect to include adult (commercial size) animals cannot be reasonably concluded.	The assessments have been updated to take into consideration the additional data sources and comments highlighted during statutory consultation. See section 3.9.4, Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_069_064_010623	S42	Email	As such, this appears to represent rather selective data and over-generalised conclusions, and is of concern in the context of such assessments if this practice is common, given the scope and scale of the material presented.	The assessments have been updated to take into consideration the additional data sources and comments highlighted during statutory consultation. See section 3.9.4, Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_069_065_010623	S42	Email	Table 8.29 and Figure 8.8: List of other projects, plans and activities considered within the CEA. Dredging activities and dredge disposal site. Douglas Harbour, Isle of Man. Castletown Bay, Isle of Man –not aware of this as a current operation	The Isle of Man has been consulted and the project has been removed from the cumulative assessments.	No
Mon_069_066_010623	S42	Email	Has IoM Government (Department of Infrastructure) been consulted on the details and assumptions related to the above projects?	The Isle of Man has been consulted on their dredging and disposal licences and the cumulative assessment have been updated where relevant.	No
Mon_069_067_010623	S42	Email	Tier 3: need to include Ørsted Isle of Man windfarm and, under the appropriate heading, Crogga gas exploration/production projects.	The Mooir Vannin Offshore Wind Farm has been included within the CEA in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement as a Tier 2 project. The Crogga project has been included in Volume 5, Annex 5.1: Cumulative effects screening matrix and included in the CEA in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_069_068_010623	S42	Email	Has Manx Utilities been consulted over plans for a second electricity interconnector between UK and east coast Isle of Man? This is considered likely within 10 years. And then assessed as appropriate in subsequent analysis.	Consultation with Manx Utilities has been carried which informs the CEA within the Mona Offshore Wind Project Environmental Statement.	No
Mon_069_069_010623	S42	Email	Table 8.32: Summary of potential environmental effects, mitigation and monitoring Underwater noise impacting fish and shellfish receptors Noting figures 8.4-8.7 and the significant overlap of the array and sound generation area on the spawning and nursery grounds of herring, sandeel and cod (and given their sensitivity to noise (*8.8.3.33 Herring are known to be particularly sensitive to underwater noise (i.e. Group 4 species).	The Applicant notes your response.	No
Mon_069_070_010623	S42	Email	And that the adjacent Morgan PEIR identified that 'further mitigation is currently being investigated to minimise risks of significant impacts if piling occurs during the herring spawning season.'	The Applicant has developed an outline Marine mammal mitigation protocol (MMMP) which has been submitted with the application for consent. The outline MMMP presents appropriate mitigation for activities that could potentially lead to injurious effects on marine mammals including: piling, UXO clearance and some types of geophysical activities. The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate.	Yes





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				Project refinements and potential mitigation options will be considered within the Underwater Sound Management Strategy (UWSMS), an outline of which has been submitted with the application for consent. The UWSMS will be updated postapplication, discussed and agreed with stakeholders.	
Mon_069_071_010623	S42	Email	The Isle of Man Government considers that a similar assessment is likely appropriate for the Mona development, and seeks reassurance that expert stakeholders, including AFBI, have specifically indicated that the Mona proposal are appropriate.	Expert stakeholders have been consulted on methodology and assessment throughout the Mona Offshore Wind Project application with relevance to fish and shellfish ecology, through the Expert Working Group (which includes the Isle of Man government). The AFBI has also been consulted to request data. A summary of consultation feedback relevant to fish and shellfish ecology is demonstrated in Table 3.6, Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_069_072_010623	S42	Email	It is recommended that specific consultation with AFBI on herring spawning and nursery areas is undertaken with regard to effects, mitigation and monitoring is undertaken, and with inclusion of Isle of Man Government (DEFA) due to developing interest in the fishery and relevant herring legislation in the region.	AFBI have been consulted during the pre-application process in particular to source data and information on herring spawning to refine and better define herring spawning grounds in the vicinity of the Isle of Man. Expert stakeholders have been consulted on methodology and assessment throughout the Mona Offshore Wind Project application with relevance to fish and shellfish ecology, through the EWGs, and a summary of consultation feedback relevant to fish and shellfish ecology is demonstrated in Table 3.6, Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement.	
Mon_069_073_010623	S42	Email	Table 8.32: Summary of potential environmental effects, mitigation and monitoring. It is also noted that there is no intention to undertake any monitoring of any fish and shellfish receptor for the Mona proposal.	No fish and shellfish ecology monitoring to test the predictions made within the impact assessment is considered necessary due to the certainty of effects. An Offshore In-principle Monitoring Plan (Document Reference J15) has been included in the Mona Offshore Wind Project application, which will be discussed and agreed with stakeholders once there the final detailed design to known.	No
Mon_069_074_010623	S42	Email	The Isle of Man Government is concerned that the lack of any monitoring will make it impossible to determine whether the PREDICTED effects are insignificant (as indicated), or incorrect-and do have an unpredictable effect on important receptors.	No fish and shellfish ecology monitoring to test the predictions made within the impact assessment is considered necessary due to the certainty of effects. An Offshore In-principle Monitoring Plan (Document Reference J15) has been included in the Mona Offshore Wind Project application, which will be discussed and agreed with stakeholders once there the final detailed design to known.	No
Mon_069_075_010623	S42	Email	Further, the absence of monitoring ensures that no additional data or increased understanding of windfarm impacts is obtained, which may be ultimately detrimental to the future credibility of sustainable offshore energy generation.	No fish and shellfish ecology monitoring to test the predictions made within the impact assessment is considered necessary due to the certainty of effects. An Offshore In-principle Monitoring Plan (Document Reference J15) has been included in the Mona Offshore Wind Project application, which will be discussed and agreed with stakeholders once there the final detailed design to known.	No
Mon_069_076_010623	S42	Email	Should there not be a monitoring component on the effects (e.g. landings, fishing activity patterns) on commercial fishery species (which are easier to collect data on) in order to determine the validity of the assumptions made about relevant species (e.g. scallops, queenies, crustaceans, herring etc.) and monitoring of assumed levels of effect, e.g. actually measuring the sediment loads and sound levels as predicted by modelling? Or monitoring of colonisation of potential INNS on structures? Without additional monitoring how can these EIA assessment methodologies be improved?	No fish and shellfish ecology monitoring to test the predictions made within the impact assessment is considered necessary due to the certainty of effects. Annual reviews of fishing activities will be undertaken for first five years of operations and maintenance phase to determine whether there are any changes to fishing activity within the Mona Array Area. An Offshore In-principle Monitoring Plan (Document Reference	Yes





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				J15) has been included in the Mona Offshore Wind Project application, which will be discussed and agreed with stakeholders once there the final detailed design to known.	
Mon_069_077_010623	S42	Email	In summary, it seems appropriate to be able to demonstrate (with evidence) the assumed lack of impact in at least some receptors. This requires some monitoring.	No fish and shellfish ecology monitoring to test the predictions made within the impact assessment is considered necessary due to ther certainty of effects. An Offshore In-principle Monitoring Plan (Document Reference J15) has been included in the Mona Offshore Wind Project application, which will be discussed and agreed with stakeholders once there the final detailed design to known.	No
Mon_069_078_010623	S42	Email	For all the assessments undertaken the conclusion of no significant impact, no mitigation and no monitoring appears to be unlikely to be valid.	No fish and shellfish ecology monitoring to test the predictions made within the impact assessment is considered necessary due to ther certainty of effects. An Offshore In-principle Monitoring Plan (Document Reference J15) has been included in the Mona Offshore Wind Project application, which will be discussed and agreed with stakeholders once there the final detailed design to known.	No
Mon_069_312_010623	S42	Email	Fish and shellfish ecology1.6.1.10lt is proposed that potential transboundary impacts on fish and shellfish ecology and their nature conservation interests are screened into the EIA process. A transboundary assessment has been completed and is included in volume 2, chapter 8: Fish and shellfish ecology of the PEIR. Potential impacts upon European Sites with fish as a qualifying feature are assessed within the Information to Support the Appropriate Assessment (ISAA).	The Applicant notes your response.	No
Mon_069_313_010623	S42	Email	NOTED, but the Isle of Man Government requests that the potential impacts IS NOT LIMITED to European Sites, as this assumes current or prior EU member status and designation. By definition, transboundary effects cannot assume that designations are the same either side of the boundary, and therefore Isle of Man marine conservation designations, for example Marine Nature Reserves (under the wildlife Act 1990) need to be treated as equivalent, or clearly justified as to why they are not. The Isle of Man is a signatory to various international treaties and conventions, via the UK and, as such, has its own jurisdictional responsibilities. This comment is also relevant to those made in respect of the Fish and Shellfish Ecology chapters.	MNRs have been included and assessed with Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_086_003_050623	S47	Email	Fish and shellfish ecology chapter The following comments are in reference to the Fish and Shellfish Ecology chapter of the PEIR, Volume 2, Chapter 8 and the Fish and Shellfish Ecology Technical Report, Volume 6, Annex 8.1. A general concern within the technical report is the lack of site-specific data used to characterise the baseline environment for fish and shellfish. The only site-specific data used (presented in Table 8.7) were grab samples and drop-down video that were deployed for benthic characterisation studies. These data have then been used to characterise a baseline beyond the scope of what the data were collected for. The use of data from other wind farm assessments feeds into the cycle of non-site-specific data being used to characterise a baseline, these data are either dated (over a decade old) or from sites some considerable distance from the Mona proposed area (>45 km in one case).	The Applicant has used a detailed desktop study, coupled with site-specific information with regards to (anecdotal) observations and habitat classification; this ensures that characterisation is not based upon a snapshot of site specific fisheries sampling data which may not be considered reflective of the typical communities present, given the highly mobile nature of many marine fish and shellfish species. The incorporation of time-series data from annual stock assessment surveys for example supports the characterisation by presenting information re. spatio-temporal change (e.g. the NINEL data, NIGFS data, scallop stock assessment data). The use of long time-series data (such as from the NIGFS) also provides support to the continued validity of both Coull et al., 1998 and Ellis et al., 2012, along with data collected within the wider region at other offshore wind farm developments.	No
Mon_086_004_050623	S47	Email	The reliance of offshore wind impact assessments on Coull et al., (1998) and Ellis et al., (2012) has been called into question in several of our responses to offshore developments. These data are over a decade old but seem to be used as a 'gold standard' to assess impacts on spawning and nursery grounds. If these data are to be used alongside the benthic site-specific data, Figures 8.3 highlights the importance of the Mona development area as a sand eel nursery and spawning ground with	Spawning ground maps are largely based upon broadscale data with reference to catches of 0-group fish, larvae and eggs. Given the high energy nature of the area, along with the variability/patchiness of the seabed sediments within the Irish Sea, it is not unexpected to find that large areas that were historically considered suitable for sandeel are no longer suitable from a substrate perspective, which is why the site	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			several areas deemed as prime suitability being identified, this contradicts with the assumption made in 8.8.2.22 that the area is largely unsuitable habitat for sand eels.	specific benthic sediment composition data to provide the latest information in this regard to ensure the assessment is correctly informed (see Volume 6, Annex 3.1: Fish and shellfish technicla report of the Environmental Statement). There is also a degree of uncertainty in the mapped spawning grounds which show broadscale boundaries, but it is widely known that the exact grounds used within the region can show a degree of change year on year. It is important to cross reference between many desktop sources, and longer term studies to ensure a robust characterisation. The use of long time-series data (such as from the NIGFS) also provides support to the continued validity of both Coull <i>et al</i> ., 1998 and Ellis <i>et al.</i> , 2012, along with data collected within the wider region at other offshore wind farm developments.	
Mon_086_005_050623	S47	Email	The Mona development area is highlighted as an important area for gadoid, herring, and sand eel nursery grounds/spawning areas, all of which are shown to occur with high frequency in locations that overlap with the development area (Figure 8.4 – 8.7. However, the assessment of the impact on these species states that there will be "minor adverse effect" at worse, with no monitoring or mitigation suggested. This, in our opinion, calls into question the methodology used in the assessment. If there is an overlap of high intensity spawning/nursery areas, then surely some form of monitoring is needed to ensure there are no adverse effects on the ecology of these commercially important stocks. If such effects are found, mitigation would be needed. Having no form of mitigation for, or monitoring of these stocks is in contravention of NW-FISH 3 marine plan, that states "adverse impacts on essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes, must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant".	With regards to herring and sandeel, the site specific substrate composition data has been used to provide the most current representation of likely spawning (and residence, in the case of sandeel) grounds (see Volume 6, Annex 3.1: Fish and shellfish technicla report of the Environmental Statement). Sandeel are not considered sensitive to sound (more so to particle motion, of which there is little evidence available), due to the absence of a swim bladder. Herring and cod are group 4 and 3 fish, using their swim bladder in relation to hearing, and are considered sensitive to noise. The assessment has been fully reviewed based upon a refined project design and the updated assessment outcomes in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_086_006_050623	S47	Email	this chapter. The use of data that is over a decade old in some cases, or from other developments	The baseline characterisation uses a number of information sources, including long term repeated regional survey effort and published literature to ensure a current baseline is provided. For species closely linked with the seabed, with well reported preferences for spawning ground substrate characteristics, the sediment composition data ensures an up-to-date characterisation on the potential for spawning within the area. The use of long time-series data (such as from the NIGFS) also provides support to the continued validity of studies such as Coull et al., 1998 and Ellis et al., 2012, along with data collected within the wider region at other offshore wind farm developments. Further information can be found in the baseline section of Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement.	
Mon_086_007_050623	S47	Email	Data was analysed from monitoring projects of other OWF developments, however the methodology used for these monitoring projects (e.g., otter or beam trawl) is not the correct methodology for sampling receptors that the data have been used to assess (e.g., shellfish). This incorrect use of data, from inappropriate methodologies, should be accounted for when assessing impacts to receptors. Acknowledging the limitations in the data but ignoring such and using it as concrete evidence, with no precaution used, misinforms the assessment of the impacts. This is done throughout this chapter and questions the validity of the impacts assessed.	Additional information sources have been sought, where available, to support characterisation of data deficient species, such as shellfish. Scientific monitoring of data deficient stocks is improving all the time, and the use of the latest stock assessment data, in combination with landings values and anecdotal observations during benthic surveys are considered to form a robust assessment of the shellfish composition at the present time. Further information can be found in the baseline section of Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement.	



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_086_008_050623	S47	Email	We acknowledge the difficulties with the lack of site-specific, contemporary data, but we would expect to see some element of precaution taken when assessing impacts to fish and shellfish ecology, specifically when advised through inappropriate methodologies.	The baseline characterisation uses a number of information sources, including long term repeated regional survey effort and published literature to ensure a current baseline is provided. For species closely linked with the seabed, with well reported preferences for spawning ground substrate characteristics, the sediment composition data ensures an up-to-date characterisation on the potential for spawning within the area. The use of long time-series data (such as from the NIGFS) also provides support to the continued validity of studies such as Coull et al., 1998 and Ellis et al., 2012, along with data collected within the wider region at other offshore wind farm developments. Further information can be found in the baseline section of Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_088_015_040623	S42	Email	The potential influence on primary production due to the aggregation of plankton feeders in the vicinity of OWF's and hydrodynamic changes down river are ecological change drivers.	Changes in fish and shellfish communities affecting prey availability are assessed in Volume 2, Chapter 4: Marine mammals and Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement. The assessment concludes that the effect will be of minor adverse significance, which is not significant in EIA terms, for all phases of the development, both in the standalone assessment and the cumulative assessment.	No
Mon_088_016_040623	S42	Email	Research conducted on OWF's in the North Sea show that fish density is significantly increased within the wind farm of schooling and non-schooling species, which feed on plankton feeders. The reduced trawling pressure may be partially responsible for this. But, its implications may result in increased collisions with marine mammals and larger predators attracted to fish aggregations, and a bottom up food chain pressure introduced. Research has shown that marine mammals will tolerate the construction and operational phases of OWF's should the motivation to remain in the area i.e. prey abundance, be sufficient.	Changes in fish and shellfish communities affecting prey availability are assessed in Volume 2, Chapter 4: Marine mammals and Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement. The assessment concludes that the effect will be of minor adverse significance, which is not significant in EIA terms, for all phases of the development, both in the standalone assessment and the cumulative assessment.	No
Mon_088_017_040623	S42	Email	This represents a shifting baseline, and the ecological implications of the cumulative effect that Mona and other OWF projects in this area exert needs to be thoroughly understood by undertaking an evidence-based assessment. It is far more difficult to enhance a degraded system than to take proactive measures to develop sustainably.	The Applicant has used a detailed desktop study, coupled with site-specific information with regards to (anecdotal) observations and habitat classification; this ensures that characterisation is not based upon a snapshot of site specific fisheries sampling data which may not be considered reflective of the typical communities present, given the highly mobile nature of many marine fish and shellfish species. The incorporation of time-series data from annual stock assessment surveys for example supports the characterisation by presenting information re. spatio-temporal change (e.g. the NINEL data, NIGFS data, scallop stock assessment data). The project alone and cumulative assessment within Volume 2, Chapter 3: Fish and shellfish of the Environmental Statement uses and evidence based approach with all available data. Volume 2, Chapter 3: Fish and shellfish of the Environmental Statement sets out the proposed mitigation for fish and shellfish and the Biodiversity benefit and green infrastructure statement (Document Reference J7) presents that Applicants intention towards biodiversity enhancement.	Yes
Mon_088_024_040623	S42	Email	The proposed ECC makes landfall in the vicinity of the Traeth Pensarn Site of Special Scientific Interest (SSSI). WTW understands that this concern has been raised by Natural Resources Wales (NRW) and the developer has amended the MDS accordingly. However, WTW is still concerned that the proposed route to the West of the SSSI will impact sensitive reef and soft sediment features recorded in this area, including honeycomb worm reef; Sabellaria alveolate, and vegetated shingle. These features are susceptible to sediment resuspension, trenching, and drilling activity. The	Direct impacts to the Sabellaria alveolata reef at the Mona landfall have been avoided through the use of trenchless techniques which have resulted in the reef now being located outside the Mona Offshore Wind project Red Line Boundary. Regarding the potential indirect effects, such as an increase in suspended sediment concentrations, these have been	Yes



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			Sabellaria alveolate reef at Llanddulas acting as the larvae source site for recruitment at other sub-populations in the North East Irish Sea, and the vegetated shingle site identified as one of 13 judged to be of significant importance in Wales.	assessed within the Environmental Statement. Additionally during construction works, the Applicant commits to a 50 m exclusion buffer from the edge of the <i>Sabellaria alveolata</i> reef, as per industry standard practice. The buffer will be based on the extent of the reef as mapped during the 2023 Mona Phase I intertidal survey. The modelling predicts that some sediment may be deposited on the shoreline with a maximum depth of around 18 mm at the trenching location and reducing to up to 10 mm in close proximity (circa 100 m – 200 m) and typically far less along the shoreline (1 mm to 2 mm) which is redistributed further on successive tides flowing cable installation. The Applicant is therefore confident that a 50 m exclusion buffer based on the extent mapped in the 2023 surveys is sufficiently precautionary to minimise any potential indirect effects. Regarding the coastal vegetated shingle site protected as part of the SSSI within the Traeth/Pensarn SSSI, this feature is found above the high water spring line and is outside the Mona Offshore Wind Project Red Line Boundary resulting in no potential impact pathways in regard to the intertidal works being undertaken for the Mona Offshore Wind Project.	
Mon_088_025_040623	S42	Email	The ECC will pass though the Liverpool Bay SPA; specific concerns arsing from which the WTW will defer to responses made by the Royal Society for the Protection of Birds (RSPB), and the Menai Strait and Conway Bay SAC, as well as the aforementioned SSSI. These designated sites reflect the biodiversity importance of the area's intertidal sands, reefs and sandbanks. The proposed ECC encroaches on the sandbank feature known as Constable Bank which the developer acknowledges. The soft sediments of this area are breeding and spawning sites for several commercial fish species, including Atlantic Herring <i>Clupea harengus</i> , and other identified species of principle importance. The decline of fish recruitment and collapse of stocks in the Irish Sea is contributed to by the increasing pressure which is being applied to nursery grounds of which Constable Bank is an example. Further industrialisation of this area may breach a threshold beyond which the disturbance cannot be accommodated by the environment.	Comment noted and the Benthic subtidal and intertidal ecology chapter of the Environmental Statement includes a full assessment of the impact on the benthic habitats in Constable Bank and the Menai Strait and Conway Bay SAC, although noting that none of designated features of the SAC are present within the small area of overlap with the Mona Offshore Cable Corridor (as determined by the site-specific surveys) and so will not be directly impacted. The potential effects on fish species and their habitats have been assessed in full in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement. Soft sediments are not typically used by herring for spawning. Relevant fish spawning and nursery grounds are characterised and assessed within Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_121_001_050723	S47	Email	I'm responding to the consultation extension you posted to the Northern Ireland Fish Producers' Organisation, thank you for sending it. We have 2 significant concerns –	The Applicant notes your response.	No
Mon_121_002_050723	S47	Email	Have you any evidence to produce that supports your assertation that measures such as "piling soft-start" and "ramp up" has a negligible adverse significance?	Additional data sources have been incorporated where available into Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement. It is acknowledged that soft start and ramp-up measures will benefit some fish species and not others.	No
Mon_121_003_050723	S47	Email	The reference to spawning herring is disingenuous. Avoiding the greatest impact is not the same as avoiding a significant adverse impact. Nor is it appropriate to attempt to gloss over significant impacts by claiming to investigate measures you hope can provide mitigation. You either have an effective mitigation plan or you don't. If it is under investigation that means you don't have an answer yet and you may not be able to achieve one. The report should reflect that more honestly.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. The assessment Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement has been revisited. The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed project design information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind	Yes



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Project refinements and potential mitigation options will be considered within the Underwater Sound Management Strategy (UWSMS), an outline of which has been submitted with the application for consent. The UWSMS will investigate options to manage underwater sound levels in order to reduce the magnitude for the project alone to a non significant effect. The UWSMS will be updated post-application, discussed and agreed with stakeholders. The UWSMS is secured in the deemed marine licence in Schedule 14 of the draft DCO	
Mon_121_004_050723	S47	Email	That drilling and vibration has an impact on crustaceans is well documented. What mitigation measures do you propose to ensure your activity does not harm the stocks? It is simply incorrect to assume that timing of installation is the only relevant factor. How installation impacts shellfish is a much more important question.	The project design envelope has been refined since submission of the PEIR, and therefore the maximum design scenario. The assessment has been reviewed and updated where appropriate based upon the refined design parameters. Where appropriate and proportionate, mitigation measures and/or monitoring have been recommended, based upon the revised assessment outcomes. Assessment of underwater noise on crustacean and fish stocks has been assessed in volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement	Yes
Mon_121_009_050723	S47	Email	The report claims a number of minor or negligible impacts when that simply isn't accurate. On behalf of the fishing industry I request an urgent meeting to discuss the report.	Consultation has been undertaken with commercial fishing organisations. These have included fish and shellfish ecology specialists to ensure alignment between the commercial fisheries and fish and shellfish ecology baselines and assessments, including consideration of commercial importance of IEFs when determination valuation of the relevant fish and shellfish ecology receptors. The project design envelope has also been refined since submission of the PEIR. The assessment has been reviewed and updated where appropriate based upon the refined design parameters and following feedback from statutory and non-statutory bodies. The Applicant considers the assessment to represent and assess the impacts in proportion to the project design.	No
Mon_156_005_010623	S47	Feedback form	The whole project MUST be abandoned because it is damaging to the Manx people, industries, and economy, plus ecology and marine life.	Impacts to marine ecology receptors and human receptors (e.g. shipping and navigation, commercial fisheries and socio-economics including the interaction with lifeline ferry services) have been fully assessed for all phases of the project, based on a maximum design scenario approach. Designated sites within the Isle of Man territorial waters, and their associated habitats and species, have been considered and documented in the assessment process. Seascape and visual impacts and impacts on designated heritage assets from the offshore infrastructure have also been considered. The assessment has engaged with stakeholders from the Isle of Man to ensure all relevant and available data has been included and is therefore based upon the best evidence to underpin the assessment of impacts. Most assessments have determined that there will be no significant effect from the Mona Offshore Wind Project. Where a significant effect has been identified, the Applicant has set out appropriate mitigation within the application. Detailed mitigation will be determined post-consent once the project parameters are fully refined and understood. Key stakeholders, including those on	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				the Isle of Man, will be consulted to ensure the mitigation approach is suitable.	
Mon_168_001_200423	S47	Consult Online	Absolutely all for wind power in the Irish Sea, but please make sure you don't impact the critical IOM Ferry routes and any sensitive coral or fish nursery areas on the seabed of the Irish Sea, of which there are many. It would be excellent to see offshore wind projects coupled with officially recognised marine park zones once they are constructed - seems like an easy win for you, and I imagine they are areas where dredge fishing are restricted anyway.	The Benthic subtidal and intertidal ecology technical report of the Environmental Statement includes the full baseline characterisation for the Mona Offshore Wind Project based on site-specific surveys undertaken in 2021 and 2022. No corals were recorded during these surveys. The Applicant is however committed to reducing impacts on sensitive benthic habitats and has adopted a number of measures as part of the Mona Offshore Wind Project to avoid such impacts (e.g. no cable protection in Constable Bank). Further information can be found in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology. A detailed assessment has been conducted to fully appraise the potential impacts to marine life, including fish and shellfish, and identify any mitigation measures or monitoring required to minimise any potential impacts. Further information can be found in Volume 2, Chapter 3: Fish and shellfish ecology. A full assessment of impacts to shipping and navigation can be found in Volume 2, Chapter 7: Shipping and navigation.	

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D.25.9.1 Underwater sound table of responses



Table D.25.9. 1: Underwater Sound

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_051_008_310523	S42	Email	The MMO notes that mapped data, to inform the assessment on habitat suitability for herring spawning grounds, has been provided. However, the MMO disagrees that there will be no significant impacts to herring. The study area includes the herring spawning ground off the Isle of Man (Ellis et al., 2011/Coull et al., 1998/Dickey-Collas et al., 2001). Figures 8.6 and 8.7 indicate that the 135decibel (dB)behavioural effect threshold noise contour for mono-piling overlaps much of the known Isle of Man herring spawning ground. Whilst the 135dB noise contours are not shown in the maps of herring larval densities shown by the NINEL data (Figures 1.15 to1.17), a rudimentary comparison by eye also indicates that there will be an overlap of noise disturbance with areas of low, medium and high larval densities. For these reasons, predicted impacts from underwater noise (UWN)to herring will be significant. There is potential for UWN due to piling activities to interfere with herring spawning activities including aggregating, spawning and laying eggs, which could result in avoidance of the spawning grounds or reduced spawning success. Therefore, it is likely the MMO will recommend temporal mitigation in the form of a piling restriction during the Isle of Man herring spawning season (1 September to 31 October inclusive). However, more certainty in the UWN assessment will need to be provided, before the MMO can be sure the above mitigation is appropriate. The MMO recommends that additional noise reduction mitigation is used in the form of bubble curtains (see Würsig et al., 1999), or other alternative measures.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. Further information has been presented within the assessment for underwater sound impacts from pile driving to provide more certainty in the data, including mapped contours for concurrent piling and contours presented with the aggregated 10-year NINEL larval contour plot to support visual interpretation of the data. Measures adopted as part of the project for underwater sound are presented within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3)	Yes
Mon_051_010_310523	S42	Email	Figures 8.4to8.7 map noise contours between 120dB and 150dB as overlapping with the Wyre Lune and Ribble Estuary Marine Conservation Zones (MCZ). These values fall below the 186dB cumulative sound exposure level (SELcum) threshold for temporary threshold shift (TTS)in fish, however given that there is considerable uncertainty with the UWN modelling provided, the MMO considers at this stage that MCZs with fish as designated features should not be screened out of further assessment until the necessary clarifications the UWN modelling and assessment have been resolved.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. Further information has been presented within the assessment for underwater sound impacts from pile driving to provide more certainty in the data, including mapped contours for concurrent piling and contours presented with the Wyre Lune MCZ and Ribble Estuary MCZ in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_051_016_310523	S42	Email	Volume 5, Annex 3.1: Underwater Sound Technical Assessment - Major Comments The MMO acknowledges it is difficult to quantify the impacts of decommissioning at this stage, however it is likely that significant amounts of UWN will be generated and therefore the decommissioning phase should not be scoped out of the assessment.	The assessment included in Volume 6: Annex 3.1: Underwater sound technical report has been expanded to include vessel activities during all phases including decommissioning. It is considered that such activities are representative of decommissioning activities as far as reasonably practicable.	No
Mon_051_018_310523	S42	Email	The report has provided noise contours down to 110dB for the most sensitive fish receptors; this covers the 135dB threshold (Hawkins et al.,2014) which is recommended for determining an impact range for behavioural responses in herring. The report suggests that 160dB should be considered a more appropriate threshold and has cited a number of studies to support this, however all but one study focus on less acoustically sensitive fish species, with only one study assessing herring (Doksaeter et al., 2012). Additionally, Doksaeter et al., (2012) found that although naval sonar transmissions did not elicit a significant behaviour response below 168dB for herring, impulse sounds from striking a fence did produce a response at a lower sound exposure level of 145dB. For these reasons the MMO disagrees with the use of 160dB for a behavioural response threshold for acoustically sensitive fish receptors such as herring. The MMO recommends focusing on the 135dB threshold as per Hawkins et al., (2014) for the UWN assessment.		no
Mon_051_019_310523	S42	Email	The MMO considers the cumulative impacts of UWN on sensitive fish receptors, such as herring and cod, will be significant in EIA terms. The fact	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. Appropriate mitigation	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			that the construction timelines of developments overlap mean it is possible that piling activity may be undertaken at multiple OWF sites at the same time, resulting a more significant concurrent piling scenario. The proximity of OWF developments also means that there will be significant overlaps for impacts such as TTS, with the impact range for piling at Mona estimated to be 39.2km.	measures have been considered where necessary following the assessment of the impacts of underwater sound from pile driving cumulatively with other projects, based upon the revised modelling outputs in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement. Measures adopted as part of the project for underwater sound are presented within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3)	
Mon_051_020_310523	S42	Email	Minor Comments 6.5. The impacts of UWN due to unexploded ordnance (UXO) clearance have been briefly assessed withing the PEIR and are to be further assessed within the final report, once preconstruction survey results of UXOs are available. Consent for UXO clearance is usually the subject of a separate marine licence application (MLA). Whether as part of the DCO application or a separate MLA, the MMO expects to see supporting evidence and an appropriate assessment of impacts to fish from UXO to be presented for review. The assessment should include an UWN impact assessment using the hearing threshold guidelines for explosions (Popper et al., 2014).	UXO clearance is included in the application for consent to ensure all preconstruction activities are covered. Underwater sound modelling has been undertaken for UXO clearance and injury ranges are presented to support the EIA and HRA. The hearing thresholds within Popper <i>et al</i> 2014 have been used were appropriate.	No
Mon_051_021_310523	S42	Email	Table 1.18 lists the maximum hammer energy for pin piles is 3,700 kilojoules (kJ), which is different to the maximum hammer energy of 2,800 kJ mentioned earlier in the report. The MMO recommends this be clarified within the report.	3,700 kJ was used for the source characteristics modelling which is included as an addendum to Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement. This was then scaled to the energy proposed in each phase of the piling. It was not practical to model each hammer energy individually using this finite element modelling method, therefore two cases were chosen to be representative of the key sections of piling: in the case of pin piles (which are installed using a submersible hammer rig) this was chosen to be when the top of the pile is flush with the water level, i.e. when the maximum length is exposed to the water column, and at full installation depth when the hammer energy is at the maximum. It is worth noting that the hammer energies proposed have changed between PEIR and the Application.	
Mon_051_022_310523	S42	Email	Section 1.8.2.9 states that three modelling points were chosen: the Southwest boundary, the Southeast boundary, and the North/northwest boundary of the Mona Array Area. The predicted marine mammal effect ranges for a single monopile (based on the cumulative sound exposure level) are provided in Table 1.31. The MMO notes it is unclear what modelling location has been used to derive these predictions, so it would be helpful if this could be clarified.	Text has been added to Volume 5, Annex 3.1: Underwater Sound Technical Report of the Environmental Statement to explain why certain locations have been selected for modelling, for example, those with closest proximity to sensitive areas (such as fish spawning grounds, seal haul outs and marine mammal SACs). for the Application new points were selected due to boundary changes. All points were modelled fully and contours derived for each with the maximum taken forward to show the injury range results. For the Application this was found to be the northern point and is illustrated in Figure 1.12 within Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement.	no
Mon_051_023_310523	S42	Email	The MMO notes that the predictions for permanent threshold shift (PTS) appear smaller than what would be expected. The reported source level values at 750 metres (m)(see Table 1.16) are high. The MMO recommends this is double checked, or additional justification is provided to explain this PTS. The TTS predictions for fish are also provided in Table 1.34 (stationary receptor). Based on the modelled parameters presented in the assessment (and the marine mammal TTS prediction, and the single strike sound exposure level presented) the MMO would expect fish TTS ranges perhaps twice as large as those reported. Additionally, the MMO would expect larger ranges for mortality and recoverable injury in fish.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. The underwater sound modelling has been presented in Volume 5, Annex 3.1: Underwater sound technical report.	No
Mon_051_024_310523	S42	Email	The MMO notes that in Table 1.50, Group 1 Fish have a TTS range of 39,480m, whereas the other groups have a range of 39,200m. The TTS ranges should be consistent for all fish.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. The underwater sound modelling has been presented in Volume 5, Annex 3.1: Underwater sound technical report.	No
Mon_051_025_310523	S42	Email	Section 1.7.5 states that underwater sound from the operational WTGs has been estimated based on the methodology presented in Tougaard et al.	It should be noted that there are no empirical data available for underwater sound levels due to the size of turbines proposed. Consequently, it is not	no





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			(2020). Tougaard et al. (2020) estimate the received sound level using a formula. The formula represents a statistical model that was used to assess the correlation between sound pressure level (SPL)and various parameters (distance, wind speed, turbine size). However, the MMO considers this not suitable for estimation of the source levels at 1m in a bespoke model, or as substitute for modelling the propagation loss to the far field.	possible to undertake more detailed sound modelling. However, taking into account the low sound levels likely to be produced by operational turbines, the Tougaard et al. (2020) method is considered to be appropriate and proportionate.	
Mon_051_026_310523	S42	Email	Table 1.60 presents the potential impact ranges for jet cutting. The table shows a TTS range of greater than 63km predicted for very high-frequency cetaceans. However, for all marine mammal species, a disturbance range of greater than100km is predicted. The MMO recommends checking the predicted impact ranges, as some appear larger than evidenced; this may be due to a worst-case scenario approach, however this should be justified within the report.	and updated sound modelling has been undertaken. The underwater sound modelling has been presented in Volume 5, Annex 3.1: Underwater sound	No
Mon_051_027_310523	S42	Email	Disturbance thresholds are considered for marine mammals and fish. Section 1.5.5.25 applies the criteria in the Washington State Department of Transport Biological Assessment Preparation for Transport Projects Advanced Training Manual (WSDOT, 2011) for predicting the distances at which behavioural effects may occur due to sound from impulsive piling. However, the MMO considers that a threshold based on the sound pressure level root mean square (SPLrms) may not be the most appropriate or relevant for impulsive sources such as impact pile driving. Thresholds based on the peak sound pressure, or the single strike sound exposure level would be more appropriate for impulsive sounds.	The thresholds selected for each source are chosen based on the characteristics of each source, and therefore are as appropriate as possible.	No
Mon_051_034_310523	S42	Email	The MMO considers the impacts of UWN to cod will be significant, given the acoustic sensitivity of cod and the proximity and importance of the spawning grounds. It is likely that the MMO will recommend temporal piling restrictions as mitigation for cod. However, more certainty in the UWN assessment will need to be provided, before the MMO can be sure the above mitigation is appropriate.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. Appropriate mitigation measures have been considered where necessary following the assessment of the impacts of underwater sound from pile driving cumulatively with other projects, based upon the revised modelling outputs in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement. Measures adopted as part of the project for underwater sound are presented within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3)	Yes
Mon_054_132_010623	S42/S44	Email	Within Table 8.15, Maximum design scenario considered for the assessment of potential impacts on fish and shellfish ecology, NRW (A) note that the maximum design scenario for underwater noise is for 68 monopiles. However, in Volume 1, Chapter 3 Project Description, Table 3.6 Maximum design parameters: wind turbines, it states that the array will either be of 68x16 m diameter monopiles or 104 smaller wind turbine generators. Whilst NRW (A) agree that larger monopiles may require higher hammer energy and may produce a larger spatial ensonified area, the total duration of piling may increase with the increase in number of piles. NRW (A) advise that this needs to be clarified in the final ES to ensure that a realistic worst case is assessed.	The MDS presented in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement has been updated to reflect the exclusion of monopiles from the project design.	Yes
Mon_054_133_010623	S42/S44	Email	Table 8.17, Measures adopted as part of the Mona Offshore Wind Project includes implementing soft-start and ramp-up as a primary measure to reduce the potential for impacts to fish and shellfish receptors. Soft-start and ramp up is also mentioned as a mitigation measure throughout the remainder of the chapter. Whilst NRW (A) recognise that soft-start and ramp-up are standard practise in piling operations, we are unaware of any evidence to support their effectiveness to mitigate impulsive noise impact for fish or elicita fleeing behaviour. Furthermore, due to the lack of evidence to support fleeing behaviour, NRW (A) advised in the Expert Working Group (EWG) that spawning fish are assessed as static receptors. Consequently, NRW (A) advise	As the soft-start and ramp up process will be engaged for marine mammal mitigation on the Mona Offshore Wind Project, it is therefore not considered appropriate to discount this in the underwater sound modelling to ensure a realistic scenario is presented. Soft starts also reduce the instantaneous sound entering the marine environment from background levels. It is acknowledged that some fish species will benefit from this measure, and others will not. Based on this, fish will be presented as both static and fleeing receptors in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement, with the reality likely somewhere in-between the two. Fish will still be subject to the all	No





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			that within the final ES assessment, a realistic worst case scenario discounting soft-start and ramp-up measures is presented.	sounds present in the water column. As such the impacts on the fish of these phases have been modelled for both static and moving receptors.	
Mon_054_140_010623	S42/S44	Email	Throughout Section 8.8.3(and in Volume 5, Annex 3.1: Underwater sound technical report) it is unclear whether the noise ranges presented are minimum, maximum or average distances. As can be seen from the maps with the noise contours overlaid, there is variation in the modelled ranges, and hence the contours are not circular. In addition, for key information, such as thresholds for death/injury, Temporary Threshold Shift (TTS) and behavioural impacts NRW (A) advise that the area which is ensonified should be presented.	The ranges presented are based on the relationship between range and received sound level for all points on all transects, which is akin to an average however this is skewed more towards the maximum range. The ensonified areas for key thresholds are presented in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement and Volume 2, Chapter 4: Marine mammals of the Environmental Statement where appropriate.	No
Mon_054_141_010623	S42/S44	Email	A large number of scenarios for piling are described using various metrics and assumptions, however it is difficult to discern which single scenario represents the realistic worst case. Noise may act on fish IEFs at various levels both directly through death/injury to fish in the ensonified area and indirectly through TTS and behavioural effects/masking.	Additional clarity has been provided in the text in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement to clearly explain the scenario which underpins the assessment, and how the other materials presented feed into this.	
Mon_054_142_010623	S42/S44	Email	NRW (A) note that in several places soft-start and ramp up procedures are included in the noise assessment. However, as detailed above NRW (A) is not aware of any evidence of this being effective for fish, and furthermore NRW (A) (and other key consultees) have advised in the EWG meetings that fish should be modelled as static receptors. NRW (A) strongly recommend that in the final ES impacts are only presented for fish as static receptors.	As the soft-start and ramp up process will be engaged for marine mammal mitigation on the Mona Offshore Wind Project, it is therefore not considered appropriate to discount this in the underwater sound modelling to ensure a realistic scenario is presented. Soft starts also reduce the instantaneous sound entering the marine environment from background levels. It is acknowledged that some fish species will benefit from this measure, and others will not. Based on this, fish will be presented as both static and fleeing receptors in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement, with the reality likely somewhere in-between the two. Fish will still be subject to the all sounds present in the water column. As such the impacts on the fish of these phases have been modelled for both static and moving receptors.	No
Mon_054_143_010623	S42/S44	Email	The assessment of impacts from underwater noise is further obfuscated by not adhering to the assessment criteria adopted in other sections. Thus, the magnitude of the effect of underwater noise impact does not follow the definition from Volume 1, Chapter 5: Environmental Impact Assessment methodology, Table 5.4 Definition of the spatial extent, duration, frequency and reversibility when defining the magnitude of an impact, or those in Volume 2, Chapter 8, Table 8.12Definition of terms relating to the magnitude of an impact, to include the spatial extent of the impact. Rather the spatial extent of the impact is considered in the context of the sensitivity of the IEF, which according to the assessment methodology should be based on the receptor importance, vulnerability and recoverability only.	Tables defining the magnitude and sensitivity on receptors to underwater sound are included in Volume 2, Chapter 4: Marine mammals of the Environmental Statement and Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement They define magnitude and sensitivity specifically for marine mammal or fish and shellfish receptors and therefore will differ from the generic magnitude/sensitivity tables or tables that have been developed for other ecological receptors, or those included in Volume 1, Chapter 5: EIA Methodology of the Environmental Statement. The assessment for those chapters aligns with the defined sensitivity and magnitude for those receptors.	No
Mon_054_146_010623	S42/S44	Email	In Section 8.8.3.4 Construction Phase, Magnitude of impact, the scenario of two vessels piling concurrently at 35.2 km distance is described, however, it is not clear in the subsequent assessment (or from Volume 5, Annex 5.1 Underwater Sound Technical Report) where the impact from this scenario is presented.	The project design envelope has been refined since submission of the PEIR, and updated noise modelling has been undertaken. Concurrent piling ranges are presented in Volume 5, Annex 3.1: Underwater sound technical report, indicating that the concurrent piling ranges are similar to single piling, therefore concurrent piling is not expected to significantly increase the impact level. Additional clarity has been provided in the text in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement to clearly explain the scenario which underpins the assessment.	Yes
Mon_054_148_010623	S42/S44	Email	NRW (A) welcomes the stated intension to use the Popper et al, (2014) guidelines in Section 8.8.3.14 Injury, but notes that in subsequent sections they do not appear to have been consistently or clearly applied.	Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement has been drafted using the guidelines in Popper et al., 2014.	No
Mon_054_149_010623	S42/S44	Email	Section 8.8.3.15 Injury, states that the greatest realistic predicted injury ranges result from a single monopile scenario, however, this appears to contradict Annex 3.1, Section 1.9.2.13 Concurrent Piling, which states that "For injury the MDS is considered to be that of two adjacent piles, separated by a distance of 1km due to the maximal overlap of sound propagation contours leading to the	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. Additional mapped outputs, including for concurrent piling, have been presented in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement. This has included mapping of concurrent piling and presentation of injury ranges for both	Yes





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			maximum generated sound levels." NRW (A) advise that in the final ES it is clear what constitutes the realistic worst-case scenario (with fish as static receptors) and why. This should be based on the largest area ensonified to the relevant threshold, whether resulting from simultaneous piling at two spatially separate areas added together, or the enhanced field resulting from simultaneous piling at adjacent piles separated by 1km. To aid understanding, it would be beneficial if this information on worst case noise contours was also presented in a mapped format.	single and concurrent piling scenarios (noting that the maximum injury ranges for fish associated with concurrent piling may not necessarily be additive from a given piling location). The updated underwater sound modelling has been used to inform the refined maximum design scenario. Additional cross-referencing has been implemented between Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement and additional text has been added to Volume 2, chapter 3: Fish and shellfish ecology to ensure the scenario being assessed it clear.	
Mon_054_151_010623	S42/S44	Email	Sections 8.8.3.16 –17provide various ranges for Peak Sound Pressure Levels (SPLpeak) and Cumulative Sound Exposure Level (SELcum). However, as described in the Popper et al., (2014) guidelines (page 34) "Since there is also concern for effects of multiple strikes where no single strike approaches the SPLpeak, the final step in the development of criteria is to define an SELcum which is based on the combination of SELss and number of strikes that would result in the onset of the lowest level of injury (RSI) that would be considered deleterious to the species of concern." Based on this, the most appropriate metric to use as a threshold is SELcum as it takes into account the cumulative effects of strikes over the piling operation. However, underwater sound modelling results are presented for both in SPLpeak in Table 8.18 Criteria for Onset of Injury to Fish due to Impulsive Piling (Popper et al., 2014) and SELcum in Table 8.20 Fish Injury Ranges for Single Monopile Installation Based on the Cumulative SEL Metric for Fleeing Fish, for fish as static receptors, and it is not clear which information is used going forward in assessing the sensitivity of various IEF fish. As per comments above for Section 8.8.3.15, NRW (A) advise that a realistic worst case is clearly identified and fully explained in the final ES.	Additional clarity has been provided in the text in section 3.9.3, Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement to clearly explain the scenario and metrics which underpin the assessment, and how the other materials presented feed into this. Fish mortality and injury ranges have been presented using both SPL and SELcum thresholds set out by Popper et al. (2014) with discussion of both these thresholds included in the accompanying text to account for the variability in responses to sound across the various fish species. As requested, both static and moving receptors have been modelled, noting that for some fish receptors the static assumption may be more relevant than a moving receptor.	No
Mon_054_152_010623	S42/S44	Email	Sections 8.8.3.20 –21set out ranges for TTS –as advised above it would be helpful if in the final ES the noise contours were also included in a map format for the worst-case scenario of concurrent piling, whether this is from piling adjacent or at two spatially separated locations.	Disturbance contours for both dose response and 143 dB re 1µPa (SELss) threshold have been presented where relevant (including worst-case scenario, concurrent piling).	No
Mon_054_153_010623	S42/S44	Email	NRW (A) broadly welcome the approach used to quantitatively assess behavioural effects of underwater noise on fish outlined in Section 8.8.3.30, in the absence of such thresholds in the Popper et al., (2014) guidelines. We note however, that there is no table presenting this information, nor is this scenario presented in Annex 3.1 Underwater Sound Technical Report. As noted above for the ranges presented for mortality/injury, it is not clear why SPLpeak has been presented rather than SELcum, given that the impact is still from piling over several hours and so a cumulative effect is to be expected. NRW (A) recommend that in the final ES further information is provided on how and why the scenario for the 160 SPLpeak contours represents a realistic worst case.	Additional clarity has been provided in the text in section 3.9.3, Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement to clearly explain the scenario and metrics which underpin the assessment, and how the other materials presented feed into this. Mortality and injury ranges are presented for both SPL and SELcum thresholds, as recommended by Popper et al. (2014) to account for variability in fish responses to underwater sound. Section 3.9.3 also presents the behavioural effects of underwater sound on fish, with additional rationale presented for the use of the 160 dB SPLpk to inform the behavioural effects assessment presented. The use of this threshold as a guide is based on a number of studies of effects on fish behaviour, as set out and discussed in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement	No
Mon_054_154_010623	S42/S44	Email	Sections 8.8.3.31 –39describe the sensitivity of fish receptors to underwater noise and provide the quantified loss of habitat for sandeel, cod and herring as well as some references on the recoverability or vulnerability of the species. As described in our general comments on underwater noise above, NRW (A) advise that for clarity and consistency the spatial extent of the impact is considered as the magnitude of effect, rather than being part of the sensitivity of receptor assessment.	The magnitude of impact and sensitivity of fish and shellfish receptors for the underwater sound impact assessment has been reviewed. The spatial extent of the impact of underwater sound on fish and shellfish receptors is considered with the magnitude of effect in section 3.9.3 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement	No
Mon_054_174_010623	S42/S44	Email	The PEIR documentation contains some inaccuracies and assumptions made regarding underwater noise disturbance thresholds, level of precaution of the methodologies used and habituation of marine mammals to noise–further details are provided in Section 1.6.2 Detailed Comments below.	Specific comments on underwater sound thresholds have been addressed as required as per detailed comments.	No





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Mon_054_178_010623	S42/S44	Email	The use of noise mitigation strategies / attenuation technology such as bubble curtains, timing of piling (given North Anglesey Marine SAC is a summer site), or piling methods have not been proposed as potential mitigation methods. Given the impact ranges calculated in Volume 5, Annex 3.1: Underwater sound technical report, NRW (A)strongly recommend that these are considered and included in any future mitigation plan.	The assessment of effects has determined that there is only one potential significant effect predicted for the Mona project alone, for UXO clearance of the maximum UXO size where high order detonation is required. Recognising this and the potential for cumulative effects, the Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Consequently, if NAS is required a detailed exploration of available technologies will be undertaken and information presented to demonstrate how such technology would contribute to the reduction in underwater sound from piling. Project refinements and potential mitigation options will be considered within the Underwater sound management strategy, an outline of which has been submitted with the application for consent with a more detailed marine mammal mitigation protocol. The Underwater sound management strategy will be updated post-application, discussed and agreed with stakeholders.	Yes
Mon_054_246_010623	S42/S44	Email	Volume 5, Annex 3.1: Underwater sound technical report NRW (A)recommend using the term "available approach" or similar in Section 1.5.5.10 Impulsive sound. The application of harbour porpoise dose-response curves to other species (as per previous UK OWF's) is carried out solely due to the fact that there are currently no dose response curves for other cetacean species—the term 'accepted approach' could imply a level of endorsement. This does not preclude the need to discuss pros and cons of this approach and the inherent precaution in applying a dose response curve obtained for a more sensitive species (porpoise), to less sensitive species (for example minke whale and bottlenose dolphin).	Further discussion of the application of dose response has been added to Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No
Mon_054_247_010623	S42/S44	Email	With reference to Sections 1.5.5.13 –1.5.5.14, Impulsive sound, uncertainty and variability in the onset of disturbance does not preclude the need to draw conclusions on which to base an assessment, even if these are precautionary. The statement that "or indeed any such disturbance would be significant" is incorrect: The definition of level B harassment (i.e. both the 120 dB SPLrms and 160 dB SPLrms fixed noise thresholds used in this report) refers to "acts that have the potential to disturb (to a biologically significant degree -but not injure) a marine mammal or marine mammal stock in the wild by disrupting behavioural patterns, including, but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering." Fixed noise thresholds are set based on behavioural data to assume disturbance will occur beyond, at, or above this level—thus a 100% rate of disturbance should be assumed when applying a fixed noise threshold. As discussed in detail in Southall (2021) and Tyack and Thomas (2019), responses to disturbance in nature tend to be probabilistic. Differences between species, among individuals, across situational contexts, and with the temporal and spatial scales over which exposures occur lead to variability in the probability and severity of behavioural responses. This means that in the wild, individuals do not always react to sound levels at or greater than the fixed noise thresholds, but also can and do react to sound levels that are lower than the fixed noise threshold. This is clearly illustrated in dose response curves which show the probability of a behavioural reaction against different sound levels. Indeed, fixed noise thresholds are known to underestimate the number of disturbed animals versus a dose response curve. Tyack and Thomas (2019) demonstrated that using a fixed noise threshold can underestimate effects by a factor of 280 versus a dose-response function. It is therefore potentially misleading to argue the above unless within the context of a full review of the pros and cons o	The applicant notes NRW's comments on fixed thresholds vs dose-response and the limitations of both these approaches. Volume 2, Chapter 4: Marine mammals of the Environmental Statement presents both approaches in the assessment.	No





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			disturbance, and variability of behavioural reactions in the wild. There appears to be a suggestion that the conclusions made on the number of animals impacted should in reality be revised downwards, but no quantification of the levels of uncertainty have been provided.		
Mon_054_248_010623	S42/S44	Email	NRW(A) welcomes the intent to include directivity when calculating the SEL for geophysical surveys in Section 1.7.3.3. Pre-construction phase. Clarification is sought over whether the impact ranges presented in Table 1.26Potential Impact Ranges (m) for Marine Mammals During the Various Geophysical Investigation Activities Based on Comparison to Southall et al. (2019) SEL Thresholds, are the impact ranges for the main axis of the signal. It would be useful to also present off-axis ranges given the much higher likelihood of marine mammals to not be directly within the main beam.	Additional text has been provided in Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement in discussion of directivity characteristics of the source sounds in relation to the position of marine mammals. Directivity corrections have been applied to the source sound level data based on directivity characteristics for the proposed sources. Directivity factors were derived based on source take-off angle for an animal on the bottom of the ocean. This resulted in a larger correction (reduction in level) due to directivity at distances further from the source than for receivers close to the source (i.e. directly under).	No
Mon_054_249_010623	S42/S44	Email	In Section 1.7.4.5Pile source modelling method, NRW (A) welcome the additional accuracy obtained through the use of a finite element model for calculating the source level in the near-field region.	This modelling has been carried forward to the Application within Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement.	No
Mon_054_250_010623	S42/S44	Email	NRW (A) note that the description in Table 1.20 SEL based source levels for other sources, refers to 'SEL based source levels', however sound levels are presented in SPLrms.	This has been revised in Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement.	No
Mon_054_251_010623	S42/S44	Email	In Section 1.7.7.2 Vessels (all phases), please provide further clarification regarding the correction of +3dB applied to Root Mean Square (RMS) sound pressure level to estimate the likely peak sound pressure level.	There are no longer any thresholds for peak levels and therefore these are not used in the assessment of injury ranges. For continuous sources the peak is approximately 3 dB higher than the rms level, as can be seen in the concepts and terminology section of Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement.	No
Mon_054_252_010623	S42/S44	Email	With reference to Sections 1.8.2.11and 1.8.2.13Modelling approach, please refer to our comments in Paragraphs 181-186ofthe current document relating to Sections 9.8.5.32 –33 Injury and disturbance to marine mammals from elevated underwater sound due to vessel use and other activities and Paragraph 220relating to Sections 1.5.5.13 –1.5.5.14, Impulsive sound.	This is addressed in the responses to those comments	No
Mon_054_253_010623	S42/S44	Email	With reference to Table 1.26Potential Impact Ranges (m) for Marine Mammals During the Various Geophysical Investigation Activities Based on Comparison to Southall et al. (2019) SEL Thresholds, NRW (A) consider that a disturbance radius of 17,300 m seems excessive for a chirp/pinger type Sub-Bottom Profiler (SBP). Please provide further information /confirmation that this is correct. If this is the case, then appropriate mitigation should be applied.	This has been calculated for a worst-case indicative source (in both sound level and frequency) and therefore subject to refinement post consent, but the range is as accurate as possible given the approximations inherent in modelling these sources.	No
Mon_054_254_010623	S42/S44	Email	In Table 1.27 Potential Impact Ranges for Geotechnical Site Investigation Activities Based on Comparison to Southall et al. (2019) SEL Thresholds, a PTS impact range of 11km and disturbance radius of 31 km was estimated for vibro-coring. Please confirm that this is correct. If this is the case, then appropriate mitigation should be applied.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken and is presented in Volume 5, Annex 3.1: Underwater Sound technical report. Appropriate measures for underwater sound impacts are considered and presented in Volume 2, Chapter 3: Fish and shellfish and Volume 2, Chapter 4: Marine mammals of the Environmental Statement	Yes
Mon_054_255_010623	S42/S44	Email	NRW(A) agrees in Section 1.9.1.7 UXO clearance, that existing empirical models for UXO are known to overestimate source levels due to the dual assumptions of a mid-water charge and no deterioration of the explosive with time. Limited attempts have been made to model explosive sources on the seabed (Robinson et al.,2022). This is the reason for the recommended interim approach to assess disturbance from UXO using the latest Temporary Threshold Shift (TTS) fixed thresholds (currently Southall et al.,2019). This approach is proposed because until more accurate models are developed, the use of an inherently less conservative TTS threshold is accepted to counterbalance the precautionary nature of current models. This is because a	This approach has been applied in Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement	No





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			TTS threshold marks the boundary between the highest level of disturbance and the start of physical impacts on the auditory system.		
Mon_054_256_010623	S42/S44	Email	Clarification on the disturbance threshold used should be provided in Table 1.56Potential Impact Ranges (m) for Marine Mammals During other Construction Related Operations.	Disturbance ranges are shown for piling sources, impulsive sources other than impact piling, and non-impulsive sources in Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement. All source descriptions provide an explanation of whether they are treated as impulsive or non-impulsive.	No
Mon_054_257_010623	S42/S44	Email	In Table 1.60 Potential Impact Ranges (m) for Marine Mammal Groups from other Maintenance Operations, NRW (A) consider that a disturbance radius of 100 km seems excessive for jet cutting. Please provide further information / confirmation that this is correct.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken and is presented in Volume 5, Annex 3.1: Underwater Sound technical report.	Yes
Mon_060_051_010623	S42	Email	9.8.4 Injury and disturbance to marine mammals from elevated underwater sound during UXO clearance9.8.4.7 and Table 9.25: Potential PTS ranges for Low Order and Low Yield UXO clearance activities. Both the text and table refer to 'low yield' clearance activities. This is not a term recognised in current UXO assessments and no evidence has been published demonstrating a reduction in underwater noise for a 'low yield' clearance method. We recommend that all use of this phrase is removed.	Low order and low yield are two different types of clearance approaches and required different charge sizes for clearance, therefore both types have been modelled and assessed with respect to marine mammals. Low yield UXO is language used in guidance and therefore used in the assessment. Low yield is a term communicated to the project by clearance contractors. This term has been carried forward to the Application and described in Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement.	No
Mon_060_052_010623	S42	Email	9.8.4.42 Significance of effect –auditory injury It is not known at this stage exactly how many UXOs will require clearing, what type of devices will be present or what methods can be employed to clear individual devices. We assume this information will not be available in the final ES? When proving advice to regulators we must consider the worst-case scenario. Without detailed information, the worst-case scenario currently is that all devices will be the largest possible (907kg) and have to be cleared by high order. The predicted injury range for harbour porpoise from such a clearance is more than 15km. This cannot be mitigated. We therefore disagree with the conclusion that UXO clearance will be a minor adverse significance and not significant in EIA terms. While we appreciate including UXO clearance in the impact assessment, we recommend this activity is not included in the DCO/deemed marine license and consent is obtained via a separate marine license application post-consent, once more information is available on clearance requirements. This will enable you to refine this assessment and propose appropriate mitigation. We highlight that the Governments Joint Position Statement on UXO clearance will be updated later in this year and that consultations to support this will take place over the summer. We recommend you monitor this situation and incorporate any relevant outputs into the final ES.	UXO clearance has been included in this Application to capture the full suite of potential impacts from the Project. The Applicant acknowledges the limitations of the assessment at this stage and therefore the final MMMP, post consent, will be produced on the basis of a more accurate understanding of the number and types of UXO requiring clearance and the type of clearance approach that will be appropriate to employ. The assessment has considered the maximum adverse scenario, which in this case is high order clearance. There is insufficient information available at present to be able to commit to low order techniques although the Applicant remains committed to using this as the preferred option over high order clearance where possible. Further to the advice received here and following the application of a more precautionary density estimate for harbour porpoise which has led to an increase in the predicted number of animals potentially affected by PTS (unmitigated) we have revisited our impact assessment and, subject to the caveats and assumptions highlighted, have revised the magnitude to moderate for harbour porpoise and therefore concluded a significant effect with respect to high order clearance of UXOs. We anticipate that with appropriate mitigation measures adopted following a more detailed understanding of the UXO clearance requirement the risk of injury will be reduced and approval of any such mitigation has been secured through the Draft DCO (Document reference J.16) and will be presented as part of a post-consent plan.	
Mon_060_077_010623	S42	Email	Volume 5, annex 3.1: Underwater sound technical report1.7.3.13, UXO clearance As stated previously, the use of low noise methods such as deflagration is the preferred method of clearance, in line with the UXO clearance interim position statement. Please refer to previous comments on UXO clearance.	Low order and low yield are two different types of clearance approaches and required different charge sizes for clearance, therefore both types have been modelled and assessed with respect to marine mammals. Further clarification has been provided in Volume 5, Annex 3.1: Underwater Sound technical report of the Environmental Statement. This has been discussed through the marine mammal expert working group and described in Volume 1, Chapter 3: Project Description of the Environmental Statement.	No
Mon_060_078_010623	S42	Email	Table 1.26: Potential Impact Ranges (m) for Marine Mammals During the Various Geophysical Investigation Activities Based on Comparison to Southall et al. (2019) SEL Thresholds. Is the 17,300 m disturbance impact range for SBP correct? This looks like an anomalous number. If this correct, appropriate mitigation and/or management measures will need to be considered. Please clarify and correct if required.	This has been calculated for a worst-case indicative source (in both sound level and frequency) and therefore subject to refinement post consent, but the range is as accurate as possible given the approximations inherent in modelling these sources.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_060_079_010623	S42	Email	Table 1.27, Potential Impact Ranges for Geotechnical Site Investigation Activities Based on Comparison to Southallet al. (2019) SEL Thresholds (Comparison to Ranges for Peak SPL Where Threshold was Exceeded Shown in Brackets). Again, the PTS range of 11km for vibro piling seems excessive; please clarify and correct if required.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken and is presented in Volume 5, Annex 3.1: Underwater Sound technical report.	Yes
Mon_088_032_040623	S42	Email	Underwater noise It is understood by WTW, following a meeting with the development team in May 2023, that the Mona OWF piling strategy will take a concurrent approach. WTW will be advocating that sequential piling strategy is adopted with a further commitment to adopt soft start protocols.	Modelling has been undertaken for both concurrent and consecutive piling in Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement.	No
Mon_088_033_040623	S42	Email	Marine impact piling is a significant low-frequency high amplitude impulsive sound that can travel considerable distance in the water column. The attenuation of which is governed by the inverse square law with respect to energy intensity and distance from source. The impact on valued ecological receptors (VERs) is an ongoing area of research.	Modelling has been undertaken in Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement across a range of frequencies using attenuation more complex than the inverse square law, which seeks to include the interaction of the sound waves with the sea floor, and how low frequencies attenuate compared with higher frequencies. This is a peer reviewed method and used for a number of offshore wind farms in UK waters.	No
Mon_088_034_040623	S42	Email	Temporary and Permanent Threshold Shifts (TTS and PTS respectively) need to be considered relative to specific species present in the zone of influence of the project which is home to several identified species of principle importance. Soft start, and a sequential strategy present mitigation measures which limit the dose of underwater noise to receptors. Determination of minimum distance between sound exposure and pressure level should be made relative to the most acoustically sensitive species identified within the zone of influence of the project.	Both PTS and TTS are considered in the marine mammal and fish assessments.	No
Mon_088_037_040623	S42	Email	WTW advocates the precautionary approach with respect to underwater noise. The developer must mitigate for the encroachment and activity which will take place in the Menai Strait and Conway Bay SAC in line with noise thresholds and disturbance impacts on the designated species. This precautionary approach should be factored into all aspects of the project prior to the introduction of noise levels in UK waters; comparative to the noise mitigation regulations in the German Exclusive Economic Zone19,20, being standardised as part of the measures included in BESS. The WTW advocates for a noise limit which is applied in all UK waters and to all receptors removing any ambiguity with respect to individual project noise and cumulative effects.	A precautionary approach has been developed using maximum design parameters, which is presented in Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement.	No
Mon_156_005_010623	S47	Feedback form	The whole project MUST be abandoned because it is damaging to the Manx people, industries, and economy, plus ecology and marine life.	Impacts to marine ecology receptors and human receptors (e.g. shipping and navigation, commercial fisheries and socio-economics including the interaction with lifeline ferry services) have been fully assessed for all phases of the project, based on a maximum design scenario approach. Designated sites within the Isle of Man territorial waters, and their associated habitats and species, have been considered and documented in the assessment process. Seascape and visual impacts and impacts on designated heritage assets from the offshore infrastructure have also been considered. The assessment has engaged with stakeholders from the Isle of Man to ensure all relevant and available data has been included and is therefore based upon the best evidence to underpin the assessment of impacts. Most assessments have determined that there will be no significant effect from the Mona Offshore Wind Project. Where a significant effect has been identified, the Applicant has set out appropriate mitigation within the application. Detailed mitigation will be determined post-consent once the project parameters are fully refined and understood. Key stakeholders, including those on the Isle of Man, will be consulted to ensure the mitigation approach is suitable.	Yes



D.25.10 Marine mammals table of responses



Table D.25. 10: Marine mammals table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_051_012_310523	S42	Email	Volume 2, Chapter 9: Marine Mammals-Major Comments The MMO notes that the most direct and comprehensive way to mitigate the risk of acoustic impact on marine species is to reduce the amount of noise pollution emitted at source (noise abatement). For pile driving, there are noise reduction technologies available, such as big bubble curtains and acoustic barriers that are integrated into the piling rig. The MMO recommends that noise abatement measures are required as part of a dML	The assessment of effects has determined that there is only one potential significant effect predicted for the Mona project alone, for UXO clearance of the maximum UXO size where high order detonation is required. Recognising this and the potential for cumulative effects, the Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Consequently, if NAS is required a detailed exploration of available technologies will be undertaken and information presented to demonstrate how such technology would contribute to the reduction in underwater sound from piling. Project refinements and potential mitigation options will be considered within the Underwater sound management strategy, an outline of which has been submitted with the application for consent with a more detailed marine mammal mitigation protocol. The Underwater sound management strategy will be updated post-application, discussed and agreed with stakeholders.	
Mon_051_022_310523	S42	Email	Section 1.8.2.9 states that three modelling points were chosen: the Southwest boundary, the Southeast boundary, and the North/northwest boundary of the Mona Array Area. The predicted marine mammal effect ranges for a single monopile (based on the cumulative sound exposure level) are provided in Table 1.31. The MMO notes it is unclear what modelling location has been used to derive these predictions, so it would be helpful if this could be clarified.	Report of the Environmental Statement to explain why certain locations have been selected for modelling, for example, those with closest proximity to sensitive areas (such as fish spawning grounds, seal haul outs and marine	No
Mon_051_026_310523	S42	Email	Table 1.60 presents the potential impact ranges for jet cutting. The table shows a TTS range of greater than 63km predicted for very high-frequency cetaceans. However, for all marine mammal species, a disturbance range of greater than100km is predicted. The MMO recommends checking the predicted impact ranges, as some appear larger than evidenced; this may be due to a worst-case scenario approach, however this should be justified within the report.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. The underwater sound modelling has been presented in Volume 5, Annex 3.1: Underwater sound technical report. The ranges presented for all metrics - PTS, TTS and behavioural effects - have been checked. The thresholds used for TTS and modelling of this metric are considered to be over precautionary and therefore are not carried forward to the marine mammal impact assessment. Disturbance ranges for behavioural effects are presented and used in assessment, rather than TTS ranges.	No
Mon_053_009_010623	S47	Email	There can be sea-bed changes as windfarms can, over time, affect the depth of water, and can obstruct tidal streams (whether this affects marine life or not?) and that offshore windfarms (the noise from the turbines) can impact fauna and other marine life; and	In relation to physical processes, the impacts related to obstructions to tidal flow are detailed within the physical processes assessment (Volume 2, Chapter 1: Physical processes of the Environmental Statement). In relation to marine mammals, the impacts of changes in physical processes is scoped out of the assessment for marine mammals as agreed through the Scoping Opinion. Noise from operational turbines is assessed in Volume 2, Chapter 4: Marine Mammals of the Environmental Statement. In relation to fish and shellfish, the Mona Offshore Wind Project EIA Scoping Report (Mona Offshore Wind Limited, 2022) discusses the noise generated during operation of turbines and provides full justification for scoping this impact out of further consideration for fish and shellfish ecology within the	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				Environmental Statement (Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement).	
Mon_054_006_010623	S42/S44	Email	Marine Mammals: NRW (A)can not agree with multiple assessment conclusions in the PEIR, due to either the methodologies used or lack of justification for the approaches taken. We provide advice on the significant further work necessary.	Noted. The Applicant has addressed specific comments from NRW as required.	No
Mon_054_143_010623	S42/S44	Email	The assessment of impacts from underwater noise is further obfuscated by not adhering to the assessment criteria adopted in other sections. Thus, the magnitude of the effect of underwater noise impact does not follow the definition from Volume 1, Chapter 5: Environmental Impact Assessment methodology, Table 5.4Definition of the spatial extent, duration, frequency and reversibility when defining the magnitude of an impact, or those in Volume 2, Chapter 8, Table 8.12Definition of terms relating to the magnitude of an impact, to include the spatial extent of the impact. Rather the spatial extent of the impact is considered in the context of the sensitivity of the IEF, which according to the assessment methodology should be based on the receptor importance, vulnerability and recoverability only.	Tables defining the magnitude and sensitivity on receptors to underwater sound are included in Volume 2, Chapter 4: Marine mammals of the Environmental Statement and Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement They define magnitude and sensitivity specifically for marine mammal or fish and shellfish receptors and therefore will differ from the generic magnitude/sensitivity tables or tables that have been developed for other ecological receptors, or those included in Volume 1, Chapter 5: EIA Methodology of the Environmental Statement. The assessment for those chapters aligns with the defined sensitivity and magnitude for those receptors.	No
Mon_054_172_010623	S42/S44	Email	Marine Mammals1.5.1Key Issues NRW (A) does not agree with the approach taken to assess the area disturbed for harbour porpoise. Only the Effective Deterrent Range (EDR) approach has been used for the assessment of disturbance associated with pile driving during the construction phase to assess impacts on harbour porpoise features in the North Anglesey Marine SAC. Based on the modelled contours provided in the PEIR, it is difficult to rule out absence of an adverse effect on the North Anglesey Marine SAC for the Maximum Design Scenario (MDS) of two simultaneous monopiles drives. NRW (A) strongly advise that further information based on noise thresholds is provided, as we are currently unable to rule out an absence of Adverse Effect On Site Integrity (AEOSI) for harbour porpoise. NRW (A) recommends that in addition / in parallel to EDRs, an unweighted noise threshold of 143 dB re 1μPa (or 103 dB re 1μPa VHF-weighted) single strike sound exposure level (Brandt et al.,2018; Heinis et al.,2019)should be used to represent the minimum fixed noise threshold at which significant disturbance would occur from impulsive noise sources.	The approach to the assessment of disturbance resulting from piling sound has been reviewed and updated. An unweighted noise threshold of 143 dB re 1µPa has been applied to represent the minimum fixed sound threshold at which significant disturbance could occur for the final application in addition to the Effective Deterrence Range approach for the purposes of the Habitats Regulation Assessment. NRWs position statement (NRW, 2023b) has been reviewed and incorporated to the assessment where relevant.	No
Mon_054_173_010623	S42/S44	Email	NRW(A) considers the proposal to use a peak seasonal density of 0.097 harbour porpoise per km2to be substantially lower than the more up to date densities supplied from the latest edition of the Marine Mammal Atlas (Evans and Waggitt, 2023)ensuring that the most precautionary (or the most scientifically robust) values are taken forward to the assessment.	The final densities used in the assessment were based on the latest edition of the Welsh Marine Mammal Atlas (Evans and Waggitt, 2023) as agreed with NRW and other stakeholders via the marine mammals expert working group (EWG) and therefore some values are higher than previously assessed for PEIR.	No
Mon_054_174_010623	S42/S44	Email	The PEIR documentation contains some inaccuracies and assumptions made regarding underwater noise disturbance thresholds, level of precaution of the methodologies used and habituation of marine mammals to noise–further details are provided in Section 1.6.2 Detailed Comments below.	Specific comments on underwater sound thresholds have been addressed as required as per detailed comments.	No
Mon_054_175_010623	S42/S44	Email	The use of Management Units (MU's)as the appropriate screening distance has not always been followed when screening in projects for the assessment of potential cumulative effects on marine mammals.	The approach to cumulative effects has been revised following discussion with the marine mammal EWG on the appropriate marine mammal Management Units to adopt for each marine mammal species and therefore Volume 1, Chapter 4: Marine mammals of the Environmental Statement has been revised following agreement on this approach.	No
Mon_054_176_010623	S42/S44	Email	The two populations of bottlenose dolphins (Irish Sea MUand Offshore Channel and Southwest England MU) will need to be assessed separately. There is no evidence to support the presence of a unified population composed of both MU populations. The modelled results from the Interim Population Consequence of Disturbance (iPCoD)are highly sensitive to whether or not the unit of population is appropriate. If the boundaries applied to a management unit / population are incorrect, this will affect the observed	For bottlenose dolphin the approach agreed with the marine mammal EWG was to consider cumulative projects only within the Irish Sea MU and therefore the Offshore Channel and Southwest England MU is no longer included within the cumulative study area for this species.	No



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			population trends. The MUs effectively represent different ecotypes –the Irish Sea MU largely represents coastal bottlenose of which there are only a few hundred, whilst the Offshore Channel and Southwest England MU is primarily an offshore ecotype, of which there are thousands.		
Mon_054_177_010623	S42/S44	Email	Whilst NRW(A) tentatively agree that it may be unrealistic to assess injury and disturbance from vessel use by presenting a sum of the impact ranges of all vessels within each offshore windfarm, no alternative method has been proposed to gauge the impact. NRW (A) advise that this impact pathway is adequately assessed.	Volume 2, Chapter 4: Marine mammals of the Environmental Statement has considered a more detailed approach to assessing vessel sound to provide further quantification of the potential impacts. Empirical data has been gathered from field studies to determine realistic impact ranges and a quantification of the number of animals potentially affected based on densities of key species has been provided. In addition, we have also provided further quantification of the baseline levels of activity as provided in Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement to demonstrate any potential elevation in sound above background levels in the Mona Array Area.	No
Mon_054_178_010623	S42/S44	Email	The use of noise mitigation strategies / attenuation technology such as bubble curtains, timing of piling (given North Anglesey Marine SACis a summer site), or piling methods have not been proposed as potential mitigation methods. Given the impact ranges calculated in Volume 5, Annex 3.1: Underwater sound technical report, NRW (A)strongly recommend that these are considered and included in any future mitigation plan.	The assessment of effects has determined that there is only one potential significant effect predicted for the Mona project alone, for UXO clearance of the maximum UXO size where high order detonation is required. Recognising this and the potential for cumulative effects, the Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Consequently, if NAS is required a detailed exploration of available technologies will be undertaken and information presented to demonstrate how such technology would contribute to the reduction in underwater sound from piling. Project refinements and potential mitigation options will be considered within the Underwater sound management strategy, an outline of which has been submitted with the application for consent with a more detailed marine mammal mitigation protocol. The Underwater sound management strategy will be updated post-application, discussed and agreed with stakeholders.	
Mon_054_179_010623	S42/S44	Email	Barrier effects from piling for grey seal have not been adequately assessed.	Further detail has been provided in Volume 2, Chapter 4: Marine mammals of the Environmental Statement on barrier effects specifically in relation to any potential elevations in underwater sound close to high density areas for grey seal with evidence derived from recent studies on measurable responses of grey seals to underwater sound as per Whyte et al (2020).	No
Mon_054_180_010623	S42/S44	Email	Chapter 15 Inter-related effects, have not been adequately assessed for marine mammals	A detailed assessment of inter-related effects on marine mammals is provided in Volume 2, Chapter 11: Inter-related effects - offshore of the Environmental Statement.	No
Mon_054_181_010623	S42/S44	Email	Detailed Comments1.5.2.1Volume 2, Chapter 9: Marine Mammals With reference to Section 9.1.3 Study Area, NRW (A) recommend adding clarification regarding Mammal Units (MUs)used for grey seal, given that the Celtic and Irish Seas MU was used as the regional marine mammal study area for cetaceans, but not grey seal.	A full description of the appropriate Management Units (MUs) for grey seal is provided in Volume 2, Chapter 4: Marine mammals of the Environmental Statement and further clarification has been sought on this via consultation with the marine mammal EWG. The grey seal reference population (GSRP) combines Seal MUs in the Irish Sea together with estimates from grey seal populations in the Isle of Man, east of Ireland and southeast of Ireland. The numbers affected has also been compared to the wider OSPAR region III for additional context.	No
Mon_054_182_010623	S42/S44	Email	During the Marine Mammal Expert Working Group (EWG) in November 2022, and in subsequent written comments, NRW (A) recommended that when assessing the area disturbed for harbour porpoise, in parallel to EDRs, an unweighted noise threshold of 143 dB re 1µPa (or 103 dB re 1µPa VHF-weighted) single strike sound exposure level	NRW's position statement (NRW, 2023b) has been reviewed and subsequently the approach to the assessment of disturbance resulting from piling sound has been reviewed and updated. An unweighted sound threshold of 143 dB re 1µPa (or 103 dB re 1µPa VHF-weighted) has been	No





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			(Brandt et al.,2018; Heinis et al.,2019)should be used to represent the minimum fixed noise threshold at which significant disturbance would occur from impulsive noise sources. NRW (A)note that this is not recorded in Table 9.6 Summary of consultation activities undertaken for the Mona Offshore Wind Project relevant to marine mammals. Further information on NRW's approach to assessing disturbance from piling for harbour porpoise can be obtained from our recent position statement: Natural Resources Wales / Harbour porpoise: assessing the effect from underwater noise on their behaviour	presented in the Volume 2, Chapter 4: Marine mammals of the Environmental Statement to represent a fixed sound threshold at which significant disturbance could occur. This has been carried forward to the HRA and presented alongside the effective deterrence range (EDR) as a area-based threshold for the purposes of understanding potential overlap with SAC habitat.	
Mon_054_183_010623	S42/S44	Email	NRW (A)note in Table 9.7 Summary of key desktop reports, that the newest version of the marine mammal atlas (Evans and Waggitt, 2023) has not been included.	Data from Evans and Waggitt (2023) has been provided by NRW and subsequently included in Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No
Mon_054_184_010623	S42/S44	Email	With reference to Table 9.9 Summary of marine mammals baseline ecology –Harbour porpoise; Section 9.8.2.19; Sections 9.8.3.28–30; Sections 9.8.3.43 –47; Section 9.8.3.123; Section 9.8.3.127; Section 9.8.4.9; and Sections 9.10.2.6 –12, NRW (A)consider the proposal to use a peak seasonal density of 0.097 harbour porpoise per km2to be considerably lower than the more up to date densities supplied from the latest edition of the Marine Mammal Atlas (Evans and Waggitt, 2023). In line with what NRW (A) has recommended for previous projects, the most precautionary (or the most scientifically robust) values should be taken forward to the assessment. Although Mona is located within Scans III Block F (density = 0.086 / km2), it is reasonable to expect that noise disturbance would also overlap into Block E (density = 0.239 / km2) where densities are higher. In previous consultations / EWGs, to avoid the potential complexities of using two densities in the assessment, NRW (A)advised (and provided) the use of densities taken from the newest version of the Marine Mammal Atlas (Evans and Waggitt, in Prep), which will be published shortly, and are based on 30 years of sightings data. Density values provided for the Mona array area and Mona study area were 0.274 / km2and 0.262 / km2respectively, both of which show significantly higher densities than the proposed peak seasonal density. NRW (A)therefore advise that any assessments of magnitude and significance, population modelling, and conclusions for harbour porpoise in the PEIR documents are revised with an updated density.	Thank you for this detailed response. The densities from Evans and Waggitt (2023) have been provided by NRW and taken forward to Volume 2, Chapter 4: Marine mammals of the Environmental Statement. Subsequently the densities provided in the PEIR have been replaced with a more precautionary estimate from the updated Welsh Marine Mammal Atlas. The density of harbour porpoise used in Volume 2, Chapter 4: Marine mammals of the Environmental Statement is 0.277 animals per km2.	
Mon_054_185_010623	S42/S44	Email	With reference to Table 9.9 Summary of marine mammals baseline ecology –Bottlenose dolphin, Section 9.8.3.41and Section 9.8.3.49,NRW (A) note that for bottlenose dolphin, the use of dual densities has been proposed; use of the outer Cardigan Bay density (0.035 / km2) within a 6km region from the coastline, and the Scans III block E densities elsewhere (0.0082 / km2). To avoid the potential 34complexities of using two densities in the assessment we have previously advised (and provided) the use of densities taken from the newest version of the Marine Mammal Atlas (Evans and Waggitt, in Prep), which will be published shortly, and are based on 30 years of sightings data. Density values provided for the Mona array area and Mona study area were 0.0011/ km2and 0.0018 / km2respectively.	(2023) have been provided by NRW and taken forward to Volume 2, Chapter 4: Marine mammals of the Environmental Statement. Subsequently the densities provided in the PEIR have been replaced with a more precautionary estimate from the updated Welsh Marine Mammal Atlas. The	
Mon_054_186_010623	S42/S44	Email	NRW (A) do not recommend that water depth or distance from the coastline alone are used to predict density distributions since other factors need to be taken into consideration. NRW(A)has explored the notion against existing bottlenose dolphin monitoring data in Wales with our contractors on our Bottlenose Dolphin monitoring project(used to inform latest version of the Marine Mammal Atlas), and can confirm the lack of a clear division across depth contours or distance from the coastline. While the Small Cetacean Abundance in the North Sea (SCANS) surveys provide sightings, density and abundance estimates at a wide spatial scale, the surveys are conducted during a single month, every 11 years and therefore do not provide fine scale temporal or spatial information on species abundance and distribution. This can be an issue for marine mammal species with seasonal distributions. Ideally, NRW (A) advise that Marine Mammal Atlas densities that were provided previously should be used. These are the predictive outputs from the Generalised Linear Models and the Generalised	The densities from Evans and Waggitt (2023) have been provided by NRW and taken forward to Volume 2, Chapter 4: Marine mammals of the Environmental Statement. Subsequently the densities provided in the PEIR have been replaced with a more precautionary estimate from the updated Welsh Marine Mammal Atlas. The density of bottlenose dolphin used in Volume 2, Chapter 4: Marine mammals of the Environmental Statement is 0.0017 animals per km2 and is considered across all offshore waters rather than being confined to coastal waters as per this advice.	No





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			Estimating Equation (GLM-GEE) models, which link 30 years of sightings and effort data with a number of other parameters, should be used to derive relevant densities.		
Mon_054_187_010623	S42/S44	Email	Whilst NRW (A)recommend the use of updated density values from the more recently revised Marine Mammal Atlas to increase robustness, in view of the similarities between the two sets of densities, we do not anticipate any changes to the conclusions made for the bottlenose dolphin assessment.	Response noted. The conclusions of the impact assessment have been reviewed based on the amended densities for bottlenose dolphin and there is no change to the conclusions of the impact assessment.	No
Mon_054_188_010623	S42/S44	Email	NRW (A) recommend that further justification is provided in Table 9.9 Summary of marine mammals baseline ecology –Bottlenose dolphin, regarding the statement: "It can be reasonably assumed that most bottlenose dolphin given their coastal distribution, will be located within a 6km region from the coastline.	Response noted. Further text has been added: e.g. '6 km area from the coast (Feingold and Evans, 2014)' in Volume 2, Chapter 4: Marine mammals of the Environmental Statement and 'In Anglesey for example, the majority (83%) of sightings by Seawatch Foundation (SWF) were located within 6 km from the coastline (Feingold and Evans, 2014)' in Volume 6, Annex 4.1: Marine Mammal Technical Report of the Environmental Statement.	
Mon_054_189_010623	S42/S44	Email	NRW (A) note in Table 9.11 Marine mammal IEFs, densities, MU populations and their importance within the regional marine mammal study area—Grey seal, that the abundance for the OSPAR Region III MU given here (60,780) is the Nmin for that population. Please can clarification be provided regarding the choice of Nmin over N (64,854)?	The OSPAR Region III population presented was the most conservative for the assessment (i.e. quantification presented against the smallest population in this region to give a larger proportion potentially affected).	No
Mon_054_190_010623	S42/S44	Email	With reference to Table 9.17 Measures adopted as part of the Mona Offshore Wind Project —Primary measures: Measures included as part of the project design; Section 9.7 Measures adopted as part of the Mona Offshore Wind Project [and in Volume 5, Annex 3.1 Underwater sound technical report], NRW (A)recommends favouring low-order methodologies over high-order to harmonise with the UXO joint interim position statement (DEFRA, 2022).	We note the position statement on use of low order techniques for UXO detonation and where possible the Applicant will seek to implement this approach. However, as a precaution the impact assessment has been taken against high order clearance as this represents a worst case.	No
Mon_054_191_010623	S42/S44	Email	With reference to Table 9.17 Tertiary measures: Measures included as part of the project design and Section 9.7 Measures adopted as part of the Mona Offshore Wind Project, the use of noise mitigation strategies / attenuation technology such as bubble curtains, timing of piling (given North Anglesey Marine SAC is a summer site) or piling methods have not been proposed as potential mitigation methods. Given the impact ranges calculated in Volume 5, Annex 3.1: Underwater sound technical report, NRW (A) strongly recommend that these are considered and included in any future mitigation plan. Whilst there is the potential that mitigation might not be formally required for the purposes of removing AEOSI in the Habitats Regulations Assessment (HRA)or reducing significant effects in the Environmental Impact Assessment (EIA), it should be incorporated in accordance with industry best practice, to reduce effects in relation to European Protected Species (EPS).	where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS)	Yes
Mon_054_192_010623	S42/S44	Email	NRW (A) recommend using the terminology 'representative' rather than 'precautionary' in Section 9.8.2Underwater sound and marine mammals, when referring to the use of the dose response curve from Graham et al.,(2017)to assess behavioural disturbance for harbour porpoise, since dose response curves are more representative of actual animal response in the field (which tends to be more probabilistic). The term 'precautionary' still applies when applying a harbour porpoise dose response curve to other cetacean species such as bottlenose dolphin and minke whale, as both these species are likely to be less sensitive than harbour porpoise to behavioural disturbance as noted in the literature e.g: Tougaard (2021).	Response noted. In the application for consent, terminology has been changed from 'precautionary' to 'representative' with respect to discussion of dose-response and harbour porpoise using Graham et al (2017). For other species the dose-response is expected to be precautionary as highlighted by NRW.	No



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Mon_054_193_010623	S42/S44	Email	NRW (A)recommend including references to studies by Gotz and Janik (2010) and Aarts et al.,(2017)which showed similar avoidance reactions for grey seal and harbour seal to the same noise source. This should help provide further evidence that harbour seal dose response curves are also appropriate for grey seal.	Text added to Volume 2, Chapter 4: Marine mammals of the Environmental Statement: 'Other studies have shown similar avoidance reactions for both grey seal and harbour seal to the same noise source (e.g. Gotz and Janik, 2010; Aarts et al. 2017), and therefore provides justification that harbour seal dose response curves are also appropriate for grey seal.'	No
Mon_054_194_010623	S42/S44	Email	In Section 9.8.2.13 Dose response, NRW (A)recommend using the term 'available approach' or similar. The application of harbour porpoise dose-response curves to other species (as per previous UK Offshore Wind Farms) is carried out as there are currently no dose response curves for other cetacean species—'accepted approach' implies a level of endorsement. This does not preclude the need to discuss pros and cons of this approach and the inherent precaution in applying a dose response curve obtained for a more sensitive species (porpoise), to less sensitive species (for example minke whale and bottlenose dolphin).	Recommendation noted. Further discussion of the application of dose response and caveats of approach has been added to Volume 2, Chapter 4: Marine mammals of the Environmental Statement as suggested.	No
Mon_054_195_010623	S42/S44	Email	In Section 9.8.2.22 Conservatism in the underwater sound modelling approach, NRW (A) agree that the method currently used to calculate cumulative sound exposure does not take into account auditory recovery of hearing between successive impulses and as a result this leads to overestimates of the range of Permanent Threshold Shift / Temporary Threshold Shift (PTS/TTS) onset. Some studies have shown that exposures to noise with equal Cumulative Sound Exposure Levels (SELcum), but with different lengths of time between noise pulses, do not result in the same amount of TTS (for example Kastelein et al.,2014a; von Benda Beckman et al.,2022). However, the current consensus is that more data is needed before we can apply these findings to noise impact assessments (Finneran,2015; von Benda Beckman et al.,2020; Southall,2021). NRW (A)consider that, at present, there is insufficient evidence to depart from the use of the SELcum metric as it is presently calculated, and therefore assessments should be carried out using the methods currently available. The metric predicting the largest range of impact should be used for the impact assessment, and whether mitigation of this pathway is required will be determined by the assessment. Where and when sufficient evidence and data are found to support a different approach, it may be appropriate to incorporate these into an assessment. Further information on NRW's approach to assessing the effects of hearing injury from underwater noise on marine mammal populations can be obtained from our recent position statement: Natural Resources Wales / Marine mammals: assessing the effects of hearing injury from underwater noise for environmental assessments (NRW, 2023a).NRW (A)also agree that there are known effects where impulsive noise gradually becomes more continuous at greater ranges (Southall, 2019), and that to avoid complexity, impulsive noise sources are distinguished based on the nature of the sound at the source. However, we do not yet have enough data about these changes in impuls		No
Mon_054_196_010623	S42/S44	Email	With reference to Section 9.83 Construction phase, Magnitude of impact, Table 9.20 Summary of SPLpk PTS injury ranges and areas of effect for marine mammals for single monopile and single pin pile installation and Table 9.21 Summary of SELcum PTS injury ranges and areas of effect for marine mammals for monopile and pin pile installation, NRW (A) note that the unmitigated PTS onset range from SELcum extends to between 2–5 km for harbour porpoise and minke whale for concurrent piling. Has consideration been given with regard to: employing noise mitigation strategies / attenuation technology (for example bubble curtains) to reduce impacts; and submission of an application for a species licence to cover residual injury to minke whale and harbour porpoise given residual impact ranges of 1315m and 745 m? As above, whilst there is the potential that mitigation might not be formally required for the purposes of removing AEOSI in HRA or reducing significant effects in EIA, it should be incorporated in accordance with industry best practice to reduce effects in relation to EPS protection.	Updates in the project design envelope, including the removal of monopiles, means injury ranges for all species using the SPLpk metric have decreased and with primary mitigation employed (including initiation stage, soft start, maximum separation distance, no concurrent piling at maximum hammer energy) there is no residual risk of injury. Further, the injury ranges using the SELcum metric have decreased for most species and the threshold is no longer exceed for VHF cetaceans. The ranges of effect have, however, increased for LF cetaceans due to an increase in hammer energy and strike rate for the pin piles and the assessment has therefore considered this plus any residual effects following primary and tertiary mitigation. The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise	Yes





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				Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Consequently, if NAS is required a detailed exploration of available technologies will be undertaken and information presented to demonstrate how such technology would contribute to the reduction in underwater sound from piling. Project refinements and potential mitigation options will be considered within the Piling Schedule, an outline of which has been submitted with the application for consent with a more detailed marine mammal mitigation protocol. The Piling Schedule will be updated postapplication, discussed and agreed with stakeholders.	
Mon_054_197_010623	S42/S44	Email	NRW (A)disagree with the conclusion presented in Section 9.8.3.39 Behavioural Disturbance, that the extent of disturbance (from piling) is likely to be an overestimate due to impulsive noise losing its characteristics with range, particularly for harbour porpoise (the cetacean species for which dose response curves exist). This argument is valid when estimating impact ranges for PTS / TTS, but not when assessing behavioural disturbance based on dose response curves as these are obtained from field observations where animals may react to the noise they receive at their location. Therefore, whilst the noise may have lost some of its impulsive characteristics with range, the dose response curve shows the observed probability that an animal may show a behavioural response to the noise at that location and is therefore accurate. The caveats discussed in Southall et al.,(2021)refer to impulsive exposure criteria for PTS/TTS and not behavioural disturbance. NRW (A) agree, however, that disturbance ranges for bottlenose dolphin and minke whale may be overestimates, since they were based on harbour porpoise dose response curves. The indication from the literature such as Tougaard (2021) is that bottlenose dolphin and minke whale are more tolerant to noise. Anecdotal / qualitative observations also suggest that these species behave very differently from harbour porpoise. Therefore, applying a dose response curve from a more sensitive species to a less sensitive species is likely to result in overestimates of disturbance, which, whilst not ideal, might be considered a precautionary approach. That said, it should be considered that the sound energy of pile driving is highest in the low frequency range and overlaps more with the hearing range of a minke whale than that of a harbour porpoise —pile strikes of the same unweighted single-strike Sound Exposure Level (SEL)are therefore louder for a minke whale than a harbour porpoise. For minke whale, the limited evidence available from studies with sonar, indicates that they are	Response noted and the Applicant agrees that the dose response is based on observed probability of a behavioural response during piling. That distance from an impulsive sound source is a strong predictor of a behavioural response due to how sound propagates with distance and reflects the current understanding of the transition from impulsive to continuous sound. The dose response curve was based on a piling at much smaller maximum hammer energies and over distances not exceeding 60 km. As a comparison, the distance at which a 50% response was measure for the Beatrice OWF was 7.4 km at the first location piled (Graham et al 2019) compared to an approximate range of 27 to 42km for the Mona Offshore Wind Project. Therefore, whilst the assessment applies the dose response as the best available estimate of proportional responses, it is considered to be highly conservative due to the propagation distances predicted for the Mona Offshore Wind Project which for a given sound level will not be equivalent in characteristics to those found at the Beatrice OWF. We refer to the 143 dB unweighted threshold (from Tougaard, 2021) recommended by NRW which is based on a collation of field studies of harbour porpoise response to elevated underwater sound from piling. The 143 dB re 1µPa represents a precautionary threshold at which animals are likely to respond and demonstrates that any behavioural effects beyond this point are likely to be mild. We have added further text to the assessment in Volume 2, Chapter 4: Marine mammals of the Environmental Statement to explain the caveats with applying the dose response and the use of the 143 dB re 1µPa threshold is helpful in providing additional context.	No
Mon_054_198_010623	S42/S44	Email	Based on the contours provided in Figure 9.5 Concurrent piling of monopiles at a maximum hammer energy of 5,000 kJ at the greatest spatial extent showing SELSS contours in 5dB isopleths, it could be difficult to rule out an adverse effect on the North Anglesey Marine SAC for the MDS of two simultaneous monopiles. NRW (A) strongly advise that further information based on noise thresholds is provided as currently, we are unable to rule out an AEOSI for harbour porpoise. During EWG2 (July 2022) and EWG03 (November 2022), and in subsequent written comments, NRW (A) recommended that in addition / in parallel to EDRs, an unweighted noise threshold of 143 dB re 1µPa (or 103 dB re 1µPa VHF-weighted) single strike sound exposure level (Brandt et al.,2018; Heinis et al.,2019)should be used to represent the minimum fixed noise threshold at which significant disturbance would occur from impulsive noise sources. This fixed noise threshold is the modelled average of six different studies of full-scale pile driving operations and thereby represents a large amount of empirical data (Tougaard 2021). Following bespoke noise modelling the 143 dB re 1µPa noise contour should be displayed on a map of the area to determine the extent of the SAC that would be ensonified to this level of noise disturbance. Further information on NRW's approach to assessing disturbance from piling for harbour porpoise can be obtained from our recent position statement (NRW, 2023b).	NRW's position statement (NRW, 2023b) has been reviewed and subsequently the approach to the assessment of disturbance resulting from piling sound has been reviewed and updated. An unweighted sound threshold of 143 dB re 1µPa (or 103 dB re 1µPa VHF-weighted) has been presented in the Volume 2, Chapter 4: Marine mammals of the Environmental Statement to represent a fixed sound threshold at which significant disturbance could occur. This has been carried forward to the HRA and presented alongside the effective deterrence range (EDR) as a area-based threshold for the purposes of understanding potential overlap with SAC habitat.	No





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Mon_054_199_010623	S42/S44	Email	NRW (A) agree in Section 9.8.3.49 Behavioural disturbance, that the estimate leans towards conservativism in comparison with the suggested density values obtained from the most recent version of the Marine Mammal Atlas of 0.0011/ km2–0.0018 / km2. We reiterate that the argument for precaution due to the loss of impulsive characteristics cannot be made if the assessment is based on dose response curves and hence observed reactions to the noise.	The density value from the Welsh Marine Mammal Atlas (Evans and Waggitt, 2023) has been applied in Volume 2, Chapter 4: Marine mammals of the Environmental Statement. Discussions around dose response have been updated and the use of the 143dB dB re 1µPa has been applied to the assessment as per the NRW advice.	No
Mon_054_200_010623	S42/S44	Email	In Section 9.8.3.72 –73 Behavioural disturbance, predicted seal responses (based on analyses of 23 of the tagged harbour seals) in reaction to piling noise taken from Whyte et al.,(2020),are being compared to a general fixed noise threshold (based on mysticete reactions to airgun noise) to enable a conclusion of no effect. Given that response data to piling noise for seal species exists, comparison against a different threshold is unnecessary. This assessment should be revised, using only the results from Whyte et al.,(2020).	Volume 2, Chapter 4: Marine mammals of the Environmental Statement has been amended to refer to Whyte et al 2020 only.	No
Mon_054_201_010623	S42/S44	Email	Clarification is needed regarding how the 135 dB SELss value was obtained. Russell et al.,(2016)generated population-level predictions of the at-sea density of seals during piling and breaks in piling. Whyte et al.,(2020)then carried out further work on how the predicted percentage change in seal density (between non-piling and piling) relates to both the distance from the centre of the wind farm and the predicted received SELss at each cell location. They also quantified how the relationships between predicted seal density and distance / received SELss changed for both cumulative (zones of increasing distance where each increment represents all cells equal or less than that distance) and annulus (where each increment represents the previous 5 km) approaches. Using cumulative zones, Russell et al., (2016) predicted a significant decrease in seal density from received levels above 140–155 dB SELss. Whereas Whyte et al.,(2020)predicted significant decreases ≥140 dB SELss and ≥145 dB SELss when using annulus rather than cumulative zones (Table IV of Whyte et al.,(2020)).	Volume 2, Chapter 4: Marine mammals of the Environmental Statement uses the data from Whyte et al (2020). Text with respect to these response thresholds has been checked and amended as necessary.	No
Mon_054_202_010623	S42/S44	Email	Given the information above and the location of either the 145 dB SELss or the 140 dB SELss contours in Figure 9.8Mona offshore wind project and grey seal usage (Carter et al., 2022) overlaid with unweighted SELss contours due to concurrent impact piling of wind turbine monopiles at maximum hammer energy (5,500 kJ), NRW (A)recommend that the Section 9.8.3.72 –73assessment be revised, as well as the cumulative assessment, particularly in view of the haul-out present in the Dee estuary.	Volume 2, Chapter 4: Marine mammals of the Environmental Statement has presented a more detailed assessment of impacts on seal haul outs as suggested by the marine mammal EWG with specific feedback from Natural England.	No
Mon_054_203_010623	S42/S44	Email	NRW (A) query the origin of the quote, "Animals exposed to lower sound levels in the outer disturbance contours are likely to experience mild disruptions of normal behaviours but prolonged or sustained behavioural effects, including displacement, are unlikely to occur (Southall et al., 2021)." Toour knowledge, the reference provided is incorrect.	Text has been reviewed and checked with removal of incorrect reference.	No
Mon_054_204_010623	S42/S44	Email	With reference to Sections 9.8.3.83 –99Sensitivity of the receptor–Auditory injury, and Section 9.8.4.29 Sensitivity of receptor–Permanent Threshold Shift, given the results of the expert elicitation meeting on IPCoD on the effects of PTS on vital rates in marine mammal species (Booth and Heinis, 2018)NRW (A) agree to amending the sensitivity of all receptors from high to medium.	Sensitivity has been reviewed for Volume 2, Chapter 4: Marine mammals of the Environmental Statement, with regards to feedback from all stakeholders and adopting a precautionary approach and as per comments from Natural England, the sensitivity to PTS is considered to be high although noting that this is highly conservative as per Booth and Heinis (2018).	No
Mon_054_205_010623	S42/S44	Email	With reference to Section 9.8.4.18 Injury and disturbance to marine mammals from elevated underwater sound during UXO clearance, NRW (A) disagree with the statement that the onset of TTS also reflects the threshold at which behavioural displacement could occur. The use of an inherently less conservative TTS threshold is done to counterbalance the precautionary nature of current models. This is because a TTS threshold marks the boundary between the most severe levels of disturbance and the start of physical impacts on the auditory system. Therefore the TTS threshold does not "correspond to a moving away or fleeing response". In the context of its use as a	Response noted. Our use of the terminology 'fleeing response' or an animal 'moving away' is intended to reflect a strong behavioural response as an animal would be displaced from an area. However, in line with NRW's advice, the language around TTS with respect to UXO clearance has been amended to reflect that this is a significant disturbance in Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No





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			proxy when paired with current models for Unexploded Ordnance (UXO)detonation, the TTS threshold is assumed to indicate significant disturbance.		
Mon_054_206_010623	S42/S44	Email	With reference to Sections 9.8.4.18–23and Sections 9.8.4.31–39, Injury and disturbance to marine mammals from elevated underwater sound during UXO clearance, NRW (A) agree with the approach to using TTS thresholds as a proxy for assessing behavioural disturbance from UXO. However, this section has been assessed in terms of hearing impairment rather than in terms of significant behavioural disturbance. Whilst we anticipate agreeing with a conclusion of minor adverse significance, this section should be revised and assessed appropriately. Relevant tables (e.g. Tables 9.34 –9.36) should also be updated accordingly as these currently refer to the number of animals with the potential to experience TTS, rather than significant disturbance.	We have amended the language in the tables in section 4.8.4 (Table 4.34, 4.35, 4.36, 4.37, 4.38, 4.39) and section 4.10.4 (Tables 4.60, 4.61) in Volume 2, Chapter 4: Marine mammals of the Environmental Statement, to reflect this has been assessed as a strong disturbance (behavioural displacement) rather than TTS. Note that we do not use the terminology 'significant disturbance' as this would lead to confusion where we assess the significance of the impact and therefore instead apply the term 'strong disturbance'.	No
Mon_054_207_010623	S42/S44	Email	With reference to Section 9.8.4.30, thresholds for the onset of behavioural disturbance from detonation of explosives do exist (see Finneran and Jenkins, 2012). These were developed by the US Navy but are intended for repeated detonations over a 24-hour period and would not be suitable for single detonations of UXO.	Reference to Finneran and Jenkins 2012 has been added to Volume 2, Chapter 4: Marine mammals of the Environmental Statement, but caveated that this is not suitable for UXO in this case.	No
Mon_054_208_010623	S42/S44	Email	With reference to Section 9.8.5.12Injury and disturbance to marine mammals from elevated underwater sound due to vessel use and other activities, reference is made to Paragraph 9.8.2.5with respect to PTS impact ranges from vessels being overestimates. NRW (A)note that Section 9.8.2.5refers to impulsive noise, whereas noise from vessels is continuous, thus assumptions made for impulsive noise do not apply. Justification should be provided for the statement that "ranges indicated are likely to be overestimates."	The cross reference provided in the PEIR was incorrect so this has now been amended and further justification provided with respected to vessel range estimates in Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No
Mon_054_209_010623	S42/S44	Email	With reference to Section 9.8.5.18Injury and disturbance to marine mammals from elevated underwater sound due to vessel use and other activities, 120 dB SPLrms is the threshold for onset of level B harassment, which refers to "acts that have the potential to disturb (to a biologically significant degree -but not injure) a marine mammal or marine mammal stock in the wild by disrupting behavioural patterns, including, but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering." Thus the statement that "there is no distinction between mild and strong disturbance, it can be assumed that not all animals found within those ranges (Table 9.37) would be disturbed. "is incorrect and any related conclusions in the PEIR documents based on this statement should be amended	such as shipping, just one single threshold (120dB) for a level B harassment has been used. Reference to NMFS 2005 has been added changes to text to clarify in Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No
Mon_054_210_010623	S42/S44	Email	Fixed noise thresholds are set based on behavioural data to assume disturbance will occur beyond, at, or above this level. Thus a 100% rate of disturbance should be assumed when applying a fixed noise threshold. It can further be reasoned that fixed noise thresholds can be considered under-precautionary as they have been shown to underestimate the number of disturbed animals versus a dose response curve (Tyack and Thomas, 2019; Southall et al.,2021). Tyack and Thomas (2019) demonstrated that using a fixed noise threshold can underestimate numbers by a factor of 280 versus a dose-response function.	We note NRW comment on fixed thresholds vs dose-response and highlight that the Volume 2, Chapter 4: Marine mammals of the Environmental Statement presents both approaches in the assessment.	No
Mon_054_211_010623	S42/S44	Email	Whilst NRW(A) agrees that it may be unrealistic to assess injury and disturbance from vessel use by presenting a sum of the impact ranges of all vessels as outlined in Section 9.8.5.18 Injury and disturbance to marine mammals from elevated underwater sound due to vessel use and other activities, no alternative method has been proposed to gauge the impact. Given the weight of evidence showing the impacts of vessel noise (for example Sections 9.8.5.23 –9.8.5.31for harbour porpoise alone), NRW (A) advise that this impact pathway is adequately assessed, particularly given the predicted impact ranges of up to 22 km. NRW (A) suggest, for example, following an approach similar to the Wylfa Newydd project (5.2 Shadow Habitats Regulations Assessment Report).We note that conclusions on magnitude and significance for the operational and	We note NRW advice on the quantification of effects from injury/disturbance due to vessel sound. There is evidence to suggest that vessel sound can lead to disturbance to some marine mammals species, however, sound thresholds do not take into account background sound levels. In areas with high background levels (i.e. with high levels of maritime traffic) it is possible that sound from additional vessels will not exceed existing sound levels. This makes it very difficult to provide a quantitative impact assessment. However, additional empirical evidence of measured distances at which sensitive species are likely to response has been reviewed and, as recommended, also looked at the assessment for Wylfa Newydd as a example. The assessment approach has been modified to give additional quantification as to the potential effects from vessel disturbance, although unlike the example	No





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			decommissioning phases may need to be reviewed and updated based on the assessment for the construction phase.	given, do not multiply by the number of vessels as we consider that this does not present a realistic assessment as it does not consider stationary vessels nor does it account for any spatial overlap in contours where vessels may be operating in close proximity.	
Mon_054_212_010623	S42/S44	Email	With reference to Sections 9.8.5.32 –33Injury and disturbance to marine mammals from elevated underwater sound due to vessel use and other activities, NRW (A) note that for both the project alone and cumulatively, the conclusions made when assessing the impacts of vessel noise were underpinned by the general assumption that the "introduction of vessels during construction and operations and maintenance phases of the projects will not be a novel impact for marine mammals present in the area and therefore marine mammals are anticipated to demonstrate some degree of habituation to sound from vessels." Whilst NRW (A) note the findings of, for example, Culloch et al., (2016) as referenced in the cumulative assessment and the Information to Support Appropriate Assessment (ISAA), these are far from conclusive in view of existing literature. For example, a study by Wisniewska et al., (2018) showed that tagged harbour porpoises responded to fast ferry passages by making deeper dives, increasing swimming effort, and ceasing echolocation and foraging for several minutes. Although these individuals lived in highly trafficked coastal waters, they did not appear to have habituated to vessel noise (Wisniewska et al., 2018). Similar findings were made by Pirotta et al., (2013, 2015), Dyndo et al., (2015), Oakley et al., (2017), and Marley et al., (2017a, 2017b).NRW(A) therefore disagrees with the use of the term 'habituation' in this case, when describing wildlife responses to underwater stimuli. Evidence that a particular disturbance has little or no effect (specific to the metric being measured) is being referred to as habituation to support conclusions that the animals are not adversely affected by human activities. It is more likely that impact studies referred to as evidence of 'habituation' documented differences in levels of tolerance to a stressor. Proof that habituation had occurred would require long-term sequential measurements of responses by individuals to controlled stimuli. Furthermore, conclusions based on beha	Thank you for the detailed response on this point. We note the information provided and have amended the language regarding use of the terminology 'habituation to disturbance'. Additional discussion in relation to Wisniewska (2018) and other relevant studies from the published literature have been provided in Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No
Mon_054_213_010623	S42/S44	Email	With reference to Section 9.8.5.32Injury and disturbance to marine mammals from elevated underwater sound due to vessel use and other activities, where it states, "a slight increase from the existing levels of traffic in the vicinity of the Mona Offshore Wind Project may not result in high levels of disturbance. The Liverpool Bay area already has a high level of anthropogenic activities as a baseline." NRW (A) advise that these statements are justified by providing further information on the baseline levels of vessel traffic (and ideally marine noise from traffic) in the area.	Further information on baseline levels of vessel activity has been provided in the marine mammals assessment from Volume 6, Annex 7.1: Navigational Risk Assessment of the Environmental Statement.	No
Mon_054_214_010623	S42/S44	Email	With reference to Section 9.8.6.4 Increased risk of injury of marine mammals due to collision with vessels, whilst NRW (A) tentatively agree with an overall magnitude of low, further information on the shipping baseline should be provided, so as to compare with an expected increase in vessel movements of 2,004 return trips	Further information on baseline levels of vessel activity has been provided in the marine mammals assessment from Volume 6, Annex 7.1: Navigational Risk Assessment of the Environmental Statement.	No
Mon_054_215_010623	S42/S44	Email	With reference to Section 9.8.6.11 Increased risk of injury of marine mammals due to collision with vessels, NRW (A)note that when assessing impacts from vessel noise, the argument was made that marine mammals will likely be tolerant to vessel noise. Further information should be provided to support the statement that "there is considered to be a medium potential for recovery".	Further evidence has been provided in Volume 2, Chapter 4: Marine mammals of the Environmental Statement to support the discussion that whilst there may be some tolerance to vessel sound in the Mona Array Area, there will be sufficient avoidance to reduce the risk of collisions.	No
Mon_054_216_010623	S42/S44	Email	With reference to Section 9.8.6.12 Increased risk of injury of marine mammals due to collision with vessels—with reference to vessel strikes, NRW (A) suggest rephrasing	The language surrounding vessel strikes has been amended in Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No





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			'some tolerance' to 'show a high degree of avoidance behaviour', as tolerance might not be an appropriate word when referring to vessel strikes		
Mon_054_217_010623	S42/S44	Email	Regarding the geophysical surveys mentioned in Section 9.8.7.1Injury and disturbance to marine mammals from elevated underwater sound during site investigation survey, NRW (A) recommend the use of two publications by the Bureau of Ocean Energy Management (BOEM)to help inform the assessment: Crocker and Fratantonio (2016), and Halvorsen and Heaney (2018). The first tested geophysical survey devices in a large pool and the second tested them in open water.	We have reviewed the recommended publications and incorporated into Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No
Mon_054_218_010623	S42/S44	Email	Further detailed information should be provided as to the metrics / criteria used to classify sonar pulses as non-impulsive noise in Section 9.8.7.2 Injury and disturbance to marine mammals from elevated underwater sound during site investigation surveys, and/or in Volume 5, Annex 3.1: Underwater sound technical report, Section 1.7.3. Sonar pulses, both high-frequency pulses from multibeam sonars and echosounders, as well as lower frequency pulses from naval sonar, are grouped by the American regulator (NMFS, 2018)with the non-impulsive sources due to their narrowband nature, but sonar pulses are considered impulsive by the European Union Expert Group on Noise (Dekeling et al.,2014).	Further detail has been added to Volume 2, Chapter 4: Marine mammals of the Environmental Statement with reference to the NMFS study to justify the metrics.	No
Mon_054_219_010623	S42/S44	Email	With reference to Sections9.8.7.11 and 9.8.7.14 Injury and disturbance to marine mammals from elevated underwater sound during site investigation surveys, as noted previously, 120 dB SPLrms is the threshold for onset of level B harassment, thus the statement that "noting that this threshold is for 'mild disturbance' and therefore is not likely to result in displacement of animals" is incorrect and any related conclusions and assessments in the PEIR documents based on this statement should be updated / amended.	Clarification has been provided in Volume 2, Chapter 4: Marine mammals of the Environmental Statement with respect to discussions around vessel disturbance and use of 120dB threshold to represent Level B harassment.	No
Mon_054_220_010623	S42/S44	Email	Clarification should be provided in Table 9.40 Disturbance for marine mammals (all species) during geophysical and geotechnical site investigation surveys, regarding the thresholds used. Clarification should also be provided for whether the impact ranges presented are the impact ranges for the main axis of the signal. It would be useful to also present off-axis ranges given the much higher likelihood of marine mammals not being directly within the main beam.	Additional text has been provided in Volume 5: Annex 3.1: Underwater sound technical report of the Environmental Statement in discussion of direct characteristics of the source sounds in relation to the position of marine mammals.	No
Mon_054_221_010623	S42/S44	Email	With reference to Section 9.8.7.28Injury and disturbance to marine mammals from elevated underwater sound during site investigation surveys, whilst NRW (A) accept an overall sensitivity of medium, no evidence is provided to support the statement that, "to some extent, marine mammals will be able to adapt their behaviour to reduce impacts on survival and reproduction rates and tolerate elevated levels of underwater sound during site investigation surveys."	Further justification and evidence has been added to support this statement in volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No
Mon_054_222_010623	S42/S44	Email	Further information should be provided in Section 9.8.10.1 Future monitoring, regarding the statement that, "No marine mammal monitoring to test the predictions made within the impact assessment is considered necessary."	An Offshore In-principle Monitoring Plan (Document Reference J15 has been included in the Mona Offshore Wind Project application, which will be discussed and agreed with stakeholders once there is a final detailed design agreed.	No
Mon_054_223_010623	S42/S44	Email	NRW (A) recommend the addition of Project Valorous to the list of projects screened in for the cumulative effects assessment in Table 9.42 List of other projects, plans and activities considered within the CEA, as this project is currently in pre-application phase.	Project Valarous has been added to the CEA long list of projects and considered in assessments in Tier 3 where relevant. https://www.bluegemwind.com/our-projects/valorous/	No
Mon_054_224_010623	S42/S44	Email	The use of management units (MU's) as the appropriate screening distance was not always followed when screening in projects for the assessment of potential cumulative effects on marine mammals in Table 9.44 Maximum design scenario considered for the assessment of potential cumulative effects on marine mammals. For example, for injury and disturbance from underwater sound generated during piling and UXO detonation, only the Irish Sea and wider Celtic Sea MU were used. As agreed in previous EWGs, using the Irish and Celtic sea area as a screening distance for other cetacean species is	Further discussion with the marine mammal EWG has taken place with respect to the cumulative screening area. The screening areas were based on the relevant reference populations, although maximum CEA extent for cetaceans was agreed as the Celtic and Irish Seas MU (harbour porpoise). For grey seal the relevant reference population was considered to be the GSRP which combined SMUs in the Irish Sea together with grey seal units in Ireland and the IoM waters. This was presented to the EWG in a technical	No





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			a proportionate measure. For grey seal, however, the OSPAR Region III interim MU should ideally be used to screen in projects that may potentially have cumulative effects on the grey seal population. If a smaller area (or other approach) is proposed for grey seal and justified, NRW (A) would not anticipate ruling it out.	note. Upon discussion from this technical note, the CEA screening area for grey seals will be OSPAR Region III (but including OWF projects only to allow a proportionate approach).	
Mon_054_225_010623	S42/S44	Email	For screening in projects for the assessment of injury and disturbance from preconstruction site investigation surveys, a screening distance of up to 31 km was selected. Marine mammal populations are wide ranging, and MUs appropriately capture the range of such populations. The purpose of the cumulative assessment is to assess the impact of all projects whose construction phases overlap temporally with the construction phase for the Mona Offshore Wind Project and could potentially impact a population within a given MU. Thus all projects that fall within that MU should be screened in.	The approach to the CEA for site investigation surveys was revised for the Environmental Statement and presented to the EWG in a technical note. The approach has used the species-specific CEA areas (rather than the maximum modelled impact ranges derived from the underwater noise modelling assessment used in PEIR) to identify two site investigation surveys occurring simultaneously. The EWG agreed with the proposed approach of two site investigation surveys occurring simultaneously, and the rationale on which the estimate is based on (as detailed in Volume 2, Chapter 4: Marine mammals of the Environmental Statement).	No
Mon_054_226_010623	S42/S44	Email	Clarification is sought over whether the 50km and 100km buffers used to assess cumulative effects on marine mammals due to changes in prey availability in Table 9.44 Maximum design scenario considered for the assessment of potential cumulative effects on marine mammals, were obtained from Volume 2, Chapter 8: Fish and shellfish ecology?	The maximum design scenario as described for the Mona Offshore Wind Project was assessed cumulatively with projects listed in volume 2, chapter 8: Fish and shellfish ecology of the Environmental Statement over the relevant fish and shellfish study area as this was the extent over which changes to fish and shellfish resource could occur.	No
Mon_054_227_010623	S42/S44	Email	With reference to Section 9.10.2 -Injury and disturbance from underwater sound generated during piling, NRW (A) recommend that when presenting results from IPCoD modelling to provide the ratio of the impacted versus unimpacted population over a set period of time (for example the first 6 years, based on the former Favourable Conservation Status (FCS) reporting period), and the full 25 year modelled period. Quantified results (i.e. impacted/unimpacted ratios) should also be provided for other projects. If, as a result of PTS / disturbance, a population shows a continued decline of >1% per year (versus a modelled unimpacted reference population over, for example, the first 6 years since the start of piling) then there is a high likelihood that a significant effect and AEOSI cannot be ruled out (NRW, 2023a)	The iPCoD modelling has be re-run for Volume 2, Chapter 4: Marine mammals of the Environmental Statement and has taken account of the impact after 6 years, plus full 25 year modelled period.	No
Mon_054_228_010623	S42/S44	Email	It is unclear whether the contributions of the Morgan and Morecombe projects have been included in the IPCoD modelling. Given the geographical proximity and overlap these should be included along with any other Tier 2 projects which overlap temporally, and the results updated. For assessing cumulative effects from piling, NRW (A) strongly recommend the methodology used in the Scottish Natural Heritage (SNH)Report 1081 (Carter et al.,2019) as an example	At the time of the Mona PEIR, the Morecambe PEIR was not available. The assessment, including iPCoD modelling, has been reviewed on the basis of the latest information and therefore has included additional projects that have since released information into the public domain.	No
Mon_054_229_010623	S42/S44	Email	Justification should be provided to evidence the claim in Section 9.10.2.7 Injury and disturbance from underwater sound generated during piling, that a 150 dB single-strike SEL is considered 'only mild'. Existing noise thresholds for significant disturbance for piling noise include 140 dB SELss (ASCOBANS, 2014), 143 dB SELss (Heinis et al.,2019), and 145 dB SELss (Lucke et al.,2009), bearing in mind that the decibel (dB) unit is a logarithmic scale, aswell as existing dose response curves. Alternatively, the statement should be removed, and any related conclusions and assessments in the PEIR documents based on this statement updated / amended.	The piling sound assessment in Volume 2, Chapter 4: Marine mammals of the Environmental Statement has provided additional clarification regarding the relevant sound thresholds and dose response approach taking into consideration evidence presented in the studies highlighted by NRW here. The assessment now includes use of the 143 dB threshold as recommended in the NRW position paper alongside the dose response which is considered to be highly precautionary.	No
Mon_054_230_010623	S42/S44	Email	With reference to Section 9.10.2.7where it states, "This is likely to be an overestimate given highly precautionary SWF densities (1.0 animals per km2) used for the assessment at Awel y Môr. If more realistic densities (0.13 animals per km2, based on JCP Phase III Tool estimate) are taken into account, the cumulative number of harbour porpoise potentially disturbed would be up to 862 individuals (1.4% of the CIS MU)."—whilst NRW (A) agree that 1.0 animals per km2is likely a highly precautionary density, we consider both 0.13 per km2from JCP Phase III tool estimate, and 0.097 per km2proposed here to be considerably lower than the more up to date densities supplied from the latest edition of the Marine Mammal Atlas (Evans and Waggitt, 2023).	The quantitative assessment in Volume 2, Chapter 4: Marine mammals of the Environmental Statement applied the most recent, and precautionary, densities from the Welsh Marine Mammal Atlas (Evans and Waggitt, 2023) as recommended by NRW and therefore the number of animals predicted to be affected has been adjusted accordingly.	No





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Mon_054_231_010623	S42/S44	Email	Although Project Mona is located within Scans III Block F (density = 0.086 / km2), it is reasonable to expect that noise disturbance would also overlap into Block E (density = 0.239 / km2) where densities are higher. As noted in Paragraph 157 of the current document, density values provided for the Mona array area and Mona study area were 0.274 / km2and 0.262 / km2respectively, both of which show significantly higher densities than the proposed peak seasonal density. NRW (A) therefore advise that the relevant PEIR documents are revised with an updated density.	The quantitative assessment in Volume 2, Chapter 4: Marine mammals of the Environmental Statement applied the most recent, and precautionary, densities from the Welsh Marine Mammal Atlas (Evans and Waggitt, 2023) as recommended by NRW and therefore the number of animals predicted to be affected has been adjusted accordingly.	No
Mon_054_232_010623	S42/S44	Email	Strong justification needs to be provided regarding the claim in Section 9.10.2.16 Injury and disturbance from underwater sound generated during piling, that dolphin species are not predicted to be present in the Celtic and Irish seas constantly throughout the year. The newest version of the Marine Mammal Atlas (Evans and Waggitt, 2023) shows clear evidence that dolphin species are present throughout the year (albeit with seasonal fluctuations in density) in the Celtic and Irish sea region. This pattern was also documented in the 1st and 2nd editions of the Marine Mammal Atlas (Baines and Evans 2012). JNCC Report 734 -Review of Management Unit boundaries for cetaceans in UK waters (IAMMWG 2023) provides additional information regarding presence of species. NRW (A) strongly recommend that this statement is removed, and that any related conclusions and assessments in the PEIR documents based on this statement are updated / amended.	Point noted. We have amended this sentence in Volume 2, Chapter 4: Marine mammals of the Environmental Statement and updated relevant conclusions.	No
Mon_054_233_010623	S42/S44	Email	For Project Erebus, harbour porpoise density should be amended to 0.4 from 0.04 / km2in Table 9.45 Harbour porpoise cumulative assessment.	Error in value presented has been amended.	No
Mon_054_234_010623	S42/S44	Email	Justification should be provided in Section 9.10.2.17and Section 9.10.2.26Injury and disturbance from underwater sound generated during piling, regarding the claim that "highly precautionary densities were used for the respective assessments" for dolphin species and for minke whale.	Further justification has been provided to clarify the precautionary nature of the assessment in Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No
Mon_054_235_010623	S42/S44	Email	With reference to Sections 9.10.2.20and9.10.2.54 Injury and disturbance from underwater sound generated during piling, the two populations of bottlenose dolphins (Irish Sea MU and Offshore Channel and Southwest England MU) will need to be assessed separately. There is no evidence to support the presence of a unified population composed of both MU populations. The modelled results from IPCoD are highly sensitive to whether or not the unit of population is appropriate. If the boundaries applied to a MU / population are incorrect, this will affect the observed population trends. The MUs effectively represent different ecotypes –the Irish Sea MU is largely coastal bottlenose of which there are only a few hundred, and the Offshore Channel and Southwest England MU is largely an offshore ecotype, of which there are thousands.	As agreed with the marine mammal EWG the CEA will focus only on the Irish Sea MU for bottlenose dolphin and therefore projects within the Offshore Channel and Southwest England MU have no longer been scoped into the CEA for bottlenose dolphin.	No
Mon_054_236_010623	S42/S44	Email	In Table 9.50The maximum number of animals predicted to be disturbed during concurrent piling of monopiles at the Morgan Generation Assets, the Grey seal population numbers for the OSPAR Region III and the Seal MUs have been swapped.	Correction has been applied within Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No
Mon_054_237_010623	S42/S44	Email	In Section 9.10.2.51Injury and disturbance from underwater sound generated during piling, NRW (A) do not agree with the approach taken to assume that Morgan Generation Assets, Morecambe Offshore Wind Farm Generation Assets, Morgan and Morecambe Offshore Wind Farms: Transmission Asset, North Irish Sea Array and Oriel Wind farm would not be expected to contribute to the impacts of bottlenose dolphin within the Irish Sea MU. The effects of the above projects would need to be quantified through IPCoD modelling.	At the time of the Mona PEIR, the Morecambe PEIR was not available. The assessment, including iPCoD modelling, has been reviewed on the basis of the latest information at the time and therefore has included additional projects that have since released information into the public domain.	No
Mon_054_238_010623	S42/S44	Email	Overall, the magnitude of the impact of cumulative disturbance was deemed to be low and the sensitivity of the receptor is considered to be medium. Further justification should be provided in Section 9.10.3.14Injury and disturbance from pre-construction site investigation surveys, as to why the magnitude of cumulative disturbance is the same as the magnitude for Project Mona alone		No





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Mon_054_239_010623	S42/S44	Email	NRW (A)agree with the approach of using TTS thresholds as a proxy for assessing behavioural disturbance from UXO. However, Section9.10.4 Injury and disturbance from underwater sound from unexploded ordnance (UXO) detonation, has been assessed in terms of hearing impairment rather than in terms of significant behavioural disturbance. Whilst we anticipate agreeing with a conclusion of minor adverse significance, this section should be revised and assessed appropriately and Tables 9.53 –9.54updated accordingly as these currently refer to the number of animals with the potential to experience TTS, rather than significant disturbance.	The language has been amended in Volume 2, Chapter 4: Marine mammals of the Environmental Statement to reflect the assessment is for a strong disturbance rather than TTS. Note that we do not use the terminology 'significant disturbance' as this would lead to confusion where we assess the significance of the impact and therefore instead apply the term 'strong disturbance'.	No
Mon_054_240_010623	S42/S44	Email	With reference to Section 9.10.5Injury and disturbance from vessel use and other (non-piling) sound producing activities, please refer to our comments in Paragraphs 181-186relating to Section 9.8.5 Injury and disturbance to marine mammals from elevated underwater sound due to vessel use and other activities. In addition, given that the magnitude for Project Mona alone was assessed as low, justification should be provided for assessing the cumulative impact from Tier 1 and Tier 2 projects as low.	Incorrect paragraph reference was provided here. This has been amended and further justification added to support the assessment of magnitude for Tier 1 and Tier 2 projects within Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	Yes
Mon_054_241_010623	S42/S44	Email	With reference to Section 9.10.5.33Injury and disturbance from vessel use and other (non-piling) sound producing activities, the use of Mus as the appropriate screening distance has not been followed when screening in projects for the assessment of potential cumulative effects from vessel use on marine mammals. Furthermore, no justification has been provided for using a 100 km Zone Of Influence (ZOI). Marine mammal populations are wide ranging, and MUs appropriately capture the range of such populations. The purpose of the cumulative assessment is to assess the impact of all projects whose construction phases overlap temporally with the construction phase for the Mona Offshore Wind Project and could potentially impact a population within a given MU. Thus all projects that fall within that MU should be screened in. Justification should also be provided regarding the prediction that: "The impact for the remaining Tier 2 projects is predicted to be localised to within the close vicinity of the respective projects."	The CEA within Volume 2, Chapter 4: Marine mammals of the Environmental Statement considers projects within the relevant MUs for each species. The ranges of effect were general found to small for this impact and all the projects considered in Tier 2 were greater than 100 km and there was no spatial overlap in the behavioural effect zones of these projects with the Mona Offshore Wind Project.	No
Mon_054_242_010623	S42/S44	Email	It states in Section 9.10.6.4Increased risk of injury due to collision with vessels, that, "There is also a potential that the sound emissions from vessels will deter animals from the potential zone of impact". NRW (A) note that when assessing impacts from vessel noise, the argument was made that marine mammals will likely be tolerant to vessel noise.	Volume 2, Chapter 4: Marine mammals of the Environmental Statement has been updated to avoid conflicting statements and to show that at close proximity animals are likely to avoid vessels.	No
Mon_054_243_010623	S42/S44	Email	With reference to Section 9.11.2.4Transboundary effects, as noted in Paragraph 182of the current document, 120 dB SPLrms is the threshold for on set of level B harassment, therefore, the statement that "it can be assumed that not all animals found within those ranges would be disturbed" is incorrect and any related conclusions and assessments in the PEIR documents based on this statement should be updated / amended.	There is no differentiation for minor/major disturbance for continuous sound, such as shipping, just one single threshold (120dB) for a level B harassment has been used. Reference to NMFS 2005 has been added changes to text to clarify in Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	
Mon_054_244_010623	S42/S44	Email	The use of noise mitigation strategies / attenuation technology such as bubble curtains, timing of piling (given North Anglesey Marine is a summer site), or piling methods have not been proposed as potential mitigation methods in Table 9.55 Summary of potential environmental effects, mitigation and monitoring. Given the impact ranges calculated in Volume 5, Annex 3.1: Underwater sound technical report, NRW (A) strongly recommend that these are considered and included in any future mitigation plan. Whilst there is the potential that mitigation might not be formally required for the purposes of removing AEOSI in HRA or reducing significant effects in EIA, it should be incorporated in accordance with industry best-practice to reduce effects in relation to EPS protection.	The approach to the assessment of disturbance resulting from piling sound has been reviewed and updated. An unweighted sound threshold of 143 dB re 1µPa has been applied to represent the minimum fixed sound threshold at which significant disturbance could occur for the final application in addition to the EDR approach for the purposes of HRA. The position statement (NRW, 2023b) has been reviewed and incorporated to the assessment where relevant.	No
Mon_054_245_010623	S42/S44	Email	Volume 2, Chapter 15: Inter-related effects (offshore) With reference to Table 15.9, Section 15.6.2 Marine mammals, it is NRW (A)'s opinion that inter-related effects from disturbance have not been assessed adequately for marine mammals. Behavioural impacts from piling are predicted to be of regional spatial extent, medium term duration and intermittent, and the effect of behavioural disturbance		No





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			has been assessed as reversible with animals returning to baseline levels within hours/days after piling has ceased (for example Brandt et al.,2018). We interpret this to mean that animals would be disturbed over a range dictated by the 'loudest' noise (i.e. piling) only when piling is taking place. On-non piling days (given that animals would be expected to return) disturbance from other pathways could still occur, adding to the combined stressor load. A stressor can cause disturbance on multiple days to the same animal / or different numbers of animals –partly dependent on flux through the area. Thus on certain days the area of disturbance can be small, on others it is larger, yet disturbance still occurs on both days and contributes to the total stressor load on the population.		
Mon_054_246_010623	S42/S44	Email	Volume 5, Annex 3.1: Underwater sound technical report NRW (A)recommend using the term "available approach" or similar in Section 1.5.5.10 Impulsive sound. The application of harbour porpoise dose-response curves to other species (as per previous UK OWF's) is carried out solely due to the fact that there are currently no dose response curves for other cetacean species—the term 'accepted approach' could imply a level of endorsement. This does not preclude the need to discuss pros and cons of this approach and the inherent precaution in applying a dose response curve obtained for a more sensitive species (porpoise), to less sensitive species (for example minke whale and bottlenose dolphin).	Further discussion of the application of dose response has been added to Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No
Mon_054_247_010623	S42/S44	Email	With reference to Sections 1.5.5.13 –1.5.5.14, Impulsive sound, uncertainty and variability in the onset of disturbance does not preclude the need to draw conclusions on which to base an assessment, even if these are precautionary. The statement that "or indeed any such disturbance would be significant" is incorrect: The definition of level B harassment (i.e. both the 120 dB SPLrms and 160 dB SPLrms fixed noise thresholds used in this report) refers to "acts that have the potential to disturb (to a biologically significant degree -but not injure) a marine mammal or marine mammal stock in the wild by disrupting behavioural patterns, including, but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering." Fixed noise thresholds are set based on behavioural data to assume disturbance will occur beyond, at, or above this level—thus a 100% rate of disturbance should be assumed when applying a fixed noise threshold. As discussed in detail in Southall (2021) and Tyack and Thomas (2019), responses to disturbance in nature tend to be probabilistic. Differences between species, among individuals, across situational contexts, and with the temporal and spatial scales over which exposures occur lead to variability in the probability and severity of behavioural responses. This means that in the wild, individuals do not always react to sound levels at or greater than the fixed noise thresholds, but also can and do react to sound levels that are lower than the fixed noise thresholds, but also can and or eact to sound levels that are lower than the fixed noise threshold. This is clearly illustrated in dose response curves which show the probability of a behavioural reaction against different sound levels. Indeed, fixed noise thresholds are known to underestimate the number of disturbed animals versus a dose response curve. Tyack and Thomas (2019) demonstrated that using a fixed noise threshold can underestimate effects by a factor of 280 versus a dose-response function. It is therefore potentially mislea		No
Mon_054_248_010623	S42/S44	Email	NRW(A) welcomes the intent to include directivity when calculating the SEL for geophysical surveys in Section 1.7.3.3. Pre-construction phase. Clarification is sought over whether the impact ranges presented in Table 1.26Potential Impact Ranges (m) for Marine Mammals During the Various Geophysical Investigation Activities Based on Comparison to Southall et al. (2019) SEL Thresholds, are the impact ranges for the main axis of the signal. It would be useful to also present off-axis ranges given the much higher likelihood of marine mammals to not be directly within the main beam.	Additional text has been provided in Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement in discussion of directivity characteristics of the source sounds in relation to the position of marine mammals. Directivity corrections have been applied to the source sound level data based on directivity characteristics for the proposed sources. Directivity factors were derived based on source take-off angle for an animal on the	No



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				bottom of the ocean. This resulted in a larger correction (reduction in level) due to directivity at distances further from the source than for receivers close to the source (i.e. directly under).	
Mon_054_258_010623	S42/S44	Email	HRA Screening Report, Screening Matrices and Integrity Matrices NRW (A) recommend that barrier effects are scoped into the Likely Significant Effects (LSE) in Section 1.4.5 Assessment of LSE for Annex II marine mammals.	Barrier effects have been considered within the underwater sound impact assessment for marine mammals. Additional detail has been provided in Volume 2, Chapter 4: Marine mammals of the Environmental Statement to cover this impact. The potential for barrier effects has also been carried forward for consideration in the HRA.	No
Mon_054_259_010623	S42/S44	Email	NRW (A) tentatively agree to the conclusion of no LSE from vessel collision risk in Section 1.4.5.8Assessment of LSE for Annex II marine mammals, however, we advise that the increase in the number of vessels versus the baseline should be quantified.	We note NRW advice on the quantification of effects from injury/disturbance due to vessel sound. We agree that there is evidence to suggest that vessel sound can lead to disturbance to some marine mammals species, and have modified the assessment approach to give additional quantification as to the potential effects from vessel disturbance based on further review of published studies. The LSE screening has been updated to include baseline levels of vessel movements in the Mona Offshore Wind project together with the uplift in vessels anticipated during the construction, operation and maintenance and decommissioning phases. There is no overlap between the Mona Offshore Wind Project and any SAC designated for Annex II marine mammals (the closest SAC being the North Anglesey Marine/Gogledd Môn Forol SAC which is located at a distance of 22.8 km from the Mona Array Area, all other SACs are located >80 km from the Mona Array Area). Therefore, the likelihood of collisions occurring between vessels and marine mammal features of SACs is considered to be low. Vessel collision risk has, therefore, been screened out of the ISAA on the basis of no LSE.	No
Mon_054_260_010623	S42/S44	Email	NRW (A) disagree with the statement in Section 1.4.5.31Assessment of LSE for Annex II marine mammals, "Given the highly precautionary method for site selection applied during this Screening assessment". The use of MUs as the appropriate screening distance is due to the fact that marine mammal populations are wide ranging, and MUs appropriately capture the range of such populations.	Comment noted and text has been reviewed and updated within Volume 2, Chapter 4: Marine mammals of the Environmental Statement and updated within the HRA Stage 1 Screening Report.	No
Mon_054_261_010623	S42/S44	Email	Habitats Regulations Assessment Stage 2 Information to Support an Appropriate Assessment NRW (A) disagree with the statement in Section 1.5.3.6 Summary of LSE screening conclusions, that the approach to selection of relevant sites was precautionary. As noted above, the use of MUs appropriately captures the wide-ranging nature of marine mammal populations.	Comment noted and text has been reviewed and updated within Volume 2, Chapter 4: Marine mammals of the Environmental Statement and updated within the HRA Stage 1 Screening Report.	No
Mon_054_262_010623	S42/S44	Email	In Section 1.5.3.7 Summary of LSE screening conclusions, with regard to the grey seal MU, reference should be made to the OSPAR Region III interim MU and the relevant NRW position statement (NRW, 2022).	The use of OSPAR Region III has been discussed further with the marine mammal EWG and will be used for the CEA screening area for grey seals in Volume 2, Chapter 4: Marine mammals of the Environmental Statement. The HRA Stage 1 Screening report now considers European sites within the OSPAR Region III Interim MU designated for grey seal, however telemetry data from Wright and Sinclair (2022) has then been used to capture any SACs with potential connectivity to the Mona Offshore Wind Project.	No
Mon_054_263_010623	S42/S44	Email	NRW (A)recommend that Section 1.9.1.6 Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, is amended for clarification. For grey seal, NRW (A) previously advised the use of the OSPAR Region III MU as per NRW's Position Statement on the use of marine mammal MU's for screening and assessment in HRA for SACs with marine mammal features. We agreed with the proposal to use the combined Wales MU, North West England MU, SW Scotland and Northern Ireland MU for grey seal in parallel with the OSPAR Region III MU. We recommend that any similar statements within the document be amended. NRW (A) also agreed that the foraging	Further justification for the use of the GSRP has been provided to the marine mammal EWG and is presented in parallel with OSPAR Region III MU in the impact assessment in Volume 2, Chapter 4: Marine mammals of the Environmental Statement. The use of OSPAR Region III as the CEA screening area has been discussed further with the marine mammal EWG and will be used for the CEA screening area for grey seals in Volume 2, Chapter 4: Marine mammals of the Environmental Statement. The HRA Stage 1 Screening report now considers European sites within the OSPAR Region III Interim MU designated for grey seal, however telemetry	No





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			ranges from Carter et al.,(2022)would be a suitable alternative as these also capture the movement ranges of grey seal.	data from Wright and Sinclair (2022) has then been used to capture any SACs with potential connectivity to the Mona Offshore Wind Project.	
Mon_054_264_010623	S42/S44	Email	NRW (A)recommend that Section 1.9.2.77 Baseline information, is amended for clarification. There is also strong evidence (through photo-ID and telemetry studies) that grey seals range beyond Welsh SACs, also encompassing Southwest England, Northwest France and Ireland (Baines et al.,1995; Carter and Russell,2018; Jones et al.,2013; Keily et al.,2000; Langley et al.,2018, 2020; Pomeroy et al.,2014; Russell et al.,2017; Vincent et al.,2005, 2017; Russell et al.,2019, Carter et al.,2020, Luck et al.,2020). We recommend that any similar statements within the PEIR documents are amended.	The baseline presents a comprehensive assessment of the foraging ranges of grey seals moving between key haul outs and the Mona Array Area. Further detail has been provided with respect to connectivity in Volume 2, Chapter 4: Marine mammals of the Environmental Statement and relevant information has been carried forward to the HRA.	No
Mon_054_265_010623	S42/S44	Email	With reference to Table 1.101 Measures adopted as part of the Mona Offshore Wind Project relevant to the assessment of adverse effect on European sites designated for Annex II marine mammal features from underwater sound during the construction phase, please refer to Paragraphs 151 and 164of the current document advising the use of noise mitigation strategies / attenuation technology.	Measures adopted as part of the Mona Offshore Wind Project have been presented in Volume 2, Chapter 4: Marine mammals of the Environmental Statement including use of low order UXO clearance methods, limitations on vessel speed and consideration of NAS based on the information available at application. The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Consequently, if NAS is required a detailed exploration of available technologies will be undertaken and information presented to demonstrate how such technology would contribute to the reduction in underwater sound from piling. Project refinements and potential mitigation options will be considered within the Underwater Sound Management Strategy (USWMS), an outline of which has been submitted with the application for consent with a more detailed marine mammal mitigation protocol. The USWMS will be updated post-application, discussed and agreed with stakeholders.	
Mon_054_266_010623	S42/S44	Email	NRW (A)disagree with the conclusion presented in Section 1.9.3.18 Assessment of adverse effects alone, that the extent of disturbance (from piling) is likely to be an overestimate due to impulsive noise losing its characteristics with range, particularly for harbour porpoise. Please refer to our comments in Paragraph 170of the current document relating to Section 9.8.3.39 Behavioural Disturbance. We also recommend including reference to the Level B Harassment threshold for continuous noise of 120 dB SPLrms.	Point noted and we agree that the dose response is based on observed probability of a behavioural response during piling. Distance from an impulsive sound source is a strong predictor of a behavioural response due to how sound propagates, how the waveform of impulsive sounds elongates with distance and reflects the current understanding of the transition from impulsive to continuous sound. The dose response curve from measurements taken at the Beatrice offshore wind farm was based on a piling at a much smaller maximum hammer energies and over distances not exceeding 60 km. As a comparison, the distance at which a 50% response was measure for the Beatrice OWF was 7.4 km at the first location piled (Graham et al 2019) compared to an approximate range of 27 to 42km for the Mona Offshore Wind Project, depending on the transect. Therefore, whilst our assessment applies the dose response as the best available estimate of proportional responses, it is considered to be highly conservative due to the propagation distances predicted for the Mona Offshore Wind Project which for a given sound level will not be equivalent in characteristics to those found at the Beatrice OWF. We refer to the 143dB unweighted threshold (from Tougaard, 2021) recommended by NRW which is based on a collation of field studies of harbour porpoise response to elevated subsea noise from piling. The 143 dB re 1μPa represents a precautionary threshold at which animals are likely to respond and demonstrates that any behavioural effects beyond this point are likely to be mild. Further text has been added to Volume 2, Chapter 4: Marine Mammals of the Environmental Statement to explain the caveats with applying the dose response and the use of the 143 dB re 1μPa threshold is helpful in providing additional context.	





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				The amendments made to the text in Volume 2, Chapter 4: Marine Mammals of the Environmental Statement have been carried over to the ISAA.	
Mon_054_267_010623	S42/S44	Email	In Section 1.9.3.19 Assessment of adverse effects alone, please refer to our comments in Paragraphs146and 157,regarding the use of a more up to date peak seasonal density for harbour porpoise from the latest edition of the Marine Mammal Atlas (Evans and Waggitt, 2023). NRW (A) advise that any assessments of magnitude and significance, population modelling, and conclusions for harbour porpoise in the PEIR documents are revised with an updated density.	The quantitative assessment for Volume 2, Chapter 4: Marine mammals of the Environmental Statement has applied the most recent, and precautionary, densities from the Welsh Marine Mammal Atlas (Evans and Waggitt, 2023) as recommended by NRW and therefore the number of animals predicted to be affected has been adjusted accordingly. The amendments made to the text and numbers presented in Volume 2, Chapter 4: Marine Mammals of the Environmental Statement have been carried over to the assessments presented in the ISAA.	No
Mon_054_268_010623	S42/S44	Email	NRW (A)note in Section 1.9.3.20 Assessment of adverse effects alone, that for bottlenose dolphin, dual densities have been used for the assessment; the outer Cardigan Bay density (0.035 / km2) within a 6km region from the coastline, and the Scans III block E densities elsewhere (0.0082 / km2). As per our comments in Paragraph 158,to avoid the use of dual densities and overly precautionary conclusions, we have previously advised (and provided) the use of densities taken from the newest version of the Marine Mammal Atlas (Evans and Waggitt, 2023). Density values provided for the Mona array area and Mona study area were 0.0011/ km2and 0.0018 / km2respectively.	The quantitative assessment for Volume 2, Chapter 4: Marine mammals of the Environmental Statement has applied the most recent, and precautionary, densities from the Welsh Marine Mammal Atlas (Evans and Waggitt, 2023) as recommended by NRW and therefore the number of animals predicted to be affected has been adjusted accordingly. The amendments made to the text and numbers presented in Volume 2, Chapter 4: Marine Mammals of the Environmental Statement have been carried over to the assessments presented in the ISAA.	No
Mon_054_269_010623	S42/S44	Email	NRW (A) do not agree with the approach taken in Sections1.9.3.26 –30 / 1.9.4.10 –15 Assessment of adverse effects alone, to assess the area disturbed for harbour porpoise. Only the EDR approach has been used for the assessment of disturbance associated with pile driving during the construction phase to assess harbour porpoise features in the North Anglesey Marine SAC. Although the use of an EDR can be a useful, practical way of calculating the area over which effects may occur, NRW (A) considers that there is still considerable uncertainty in the evidence underpinning the calculation of these EDRs. As such, in contrast to the text in Section 1.9.3.26, this approach is not in line with guidance from NRW. Based on the modelled contours provided in Volume 2 Chapter 9, Figure 9.5Concurrent piling of monopiles at a maximum hammer energy of 5,500 kJ at the greatest spatial extent showing SELss contours in 5dB isopleths, it is difficult to rule out absence of an adverse effect on the North Anglesey Marine SAC for the MDS of two simultaneous monopiles. It is crucial that further information is provided as currently NRW(A) would not be unable to rule out an absence of adverse effect on site integrity for harbour porpoise. Further information on NRW's approach to assessing disturbance from piling for harbour porpoise can be obtained from our recent position statement (NRW, 2023b). Please also refer to our comments in Paragraph 171of the current document.	The approach to the assessment of disturbance resulting from piling sound has been reviewed and updated. An unweighted sound threshold of 143 dB re 1µPa has been applied to represent the minimum fixed sound threshold at which significant disturbance could occur for the final application in addition to the EDR approach for the purposes of HRA. The position statement (NRW, 2023b) has been reviewed and incorporated to Volume 2, Chapter 4: Marine mammals of the Environmental Statement where relevant and the ISAA.	No
Mon_054_270_010623	S42/S44	Email	Further detail should be provided in Section1.9.4.2 Assessment of adverse effects in- combination, with respect to how collective contributions were assessed for impact pathways where LSE had been ruled out with respect to Mona OWF alone.	Further detail has been added in the HRA Stage 1 Screening report where collective contributions assessed for impact pathways had been ruled out with respect to Mona Offshore Wind Project alone for the purpose of determining LSE.	No
Mon_054_271_010623	S42/S44	Email	NRW (A) recommend inclusion of Project Valorous in the list of Tier 2 projects in Table 1.167List of other projects and plans with potential for in-combination effects on Annex II marine mammal features	Project Valorous has been included in the CEA long list for consideration in all cumulative assessment where relevant.	No
Mon_054_272_010623	S42/S44	Email	With reference to Sections 1.9.4.10 –15 Assessment of adverse effects in-combination, the use of Mus as the appropriate screening distance has not always been followed when screening in projects for the assessment of potential cumulative effects. No justification has been provided for only considering the cumulative impacts of piling from Awel y Môr. Marine mammal populations are wide ranging, and MUs appropriately capture the range of such populations. The purpose of the cumulative assessment is to assess the impact of all projects whose construction phases overlap temporally with the construction phase for the Mona Offshore Wind Project and could potentially impact a	The assessment of cumulative affects has been updated within Volume 2, Chapter 4: Marine mammals of the Environmental Statement and the ISAA in light of more recent data that has become publicly available and therefore other projects have been considered.	No



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			population within a given MU. Thus all projects that fall within that MU should be screened in.		
Mon_054_273_010623	S42/S44	Email	In conjunction with our comment on the use of EDRs above, NRW (A) note that the incombination assessment has been carried out using only the EDR disturbance footprint from Awel yMôr. In the Awel y Môr Report to Inform Appropriate Assessment (RIAA), an alternative approach using dose response curves was also presented. In our response to the Awel y Môr application, NRW(A) disagreed with the use of dose response curves for area-based assessment. Although there is a strong link between the area of habitat and number of animals it supports, loss of habitat quality is a binary event as an area is either ensonified by a sound at a given level (and hence 'lost'), or not. This differs from behavioural disturbance of animals which occurs over a continuum and relates to the numbers of animals affected; the spatial / temporal thresholds for HRA are not concerned with numbers of animals. This is because harbour porpoise is a highly mobile species, able to travel hundreds of kilometres in a short period of time, part of a large wide-ranging population with highly variable numbers of animals spatially and temporally, hence the concept of a 'site population' does not apply. The chosen approach for assessing the impacts of noise on harbour porpoise SACs was grounded in quantifying the loss of habitat available to harbour porpoise a result of disturbance, given that the SACs were designated based on higher persistent densities than other areas within the harbour porpoise MU(JNCC 2020a, b; NRW 2023b). Despite this, sufficient information was provided in Table 13 of the Awel y Môr RIAA to allow NRW (A) to conclude no adverse effect on the North Anglesey Marine SAC. This was done by adding the areas of the 145 and 140 dB noise contours which overlapped the SAC (17.77 + 103.23). This gave a total daily disturbance footprint of 3.72%. Further information on NRW's approach to assessing disturbance from piling for harbour porpoise can be obtained from our recent position statement (NRW, 2023b).	(Tougaard, 2021) (detailed in Volume 2, Chapter 4: Marine mammals of the Environmental Statement) and EDR area based thresholds to the HRA (HRA Stage 1 Screening report) for final Application and removed the use of doseresponse in this context. NRWs position statement (NRW, 2023b) has been reviewed and incorporated to the assessments in the ISAA where relevant.	No
Mon_054_274_010623	S42/S44	Email	In Section 1.9.4 Assessment of adverse effects in-combination, it is unclear whether all Tier 1 and Tier 2 projects have been considered for the assessment of in-combination injury and disturbance from underwater sound generated during piling, and whether the contribution to disturbance from all projects was considered in the IPCoD modelling. NRW (A) recommend consideration of any Tier 1 and Tier 2 projects which overlap temporally, and if required the results should be updated. For assessing cumulative effects from piling, NRW (A)recommend the methodology used in the SNH Report 1081 (Carter et al.,2019) as an example.	The approach to the cumulative assessment within Volume 2, Chapter 4: Marine mammals of the Environmental Statement and the ISAA has been checked and aligned with this advice. All Tier 2 projects cannot be included in population modelling as numbers of species impacted are required which are not provided in the relevant scoping reports.	No
Mon_054_275_010623	S42/S44	Email	With reference to Section 1.9.4 Assessment of adverse effects in-combination, NRW (A)recommend using the results from IPCoD modelling when assessing impacts of disturbance on a population against conservation objectives related to the population maintaining itself on a long-term basis. These results could also inform and strengthen conclusions made for harbour porpoise. NRW (A) recommend that the ratio of the impacted versus unimpacted population over a set period of time (for example the first 6 years, based on the former Favourable Conservation Status (FCS) reporting period), and the full 25 year modelled period are provided. If, as a result of PTS or disturbance, a population shows a continued decline of >1% per year (versus a modelled unimpacted reference population over, for example, the first 6 years since the start of piling) then there is a high likelihood that a significant effect and AEOSI cannot be ruled out (NRW 2023a).	The position statement (NRW, 2023) has been reviewed and the assessment within Volume 2, Chapter 4: Marine mammals of the Environmental Statement and the ISAA has been updated where required. The results from IPCoD modelling have been presented when assessing impacts of disturbance on a population against conservation objectives. Impact are discussed after 6 years in addition to 25 years in the main text.	No
Mon_054_276_010623	S42/S44	Email	With reference to Section 1.9.4 Assessment of adverse effects in-combination, please see Paragraphs171and 242ofthe current document regarding assessment of injury and disturbance from vessel use and use of the term 'habituation'. Conclusions drawn may also need to be updated for the ISAA.	The language around habituation to disturbance (specific to the metric being measured) has been reconsidered throughout with further evidence provided where available (in Volume 2, Chapter 4: Marine mammals of the Environmental Statement and ISAA)	
Mon_054_277_010623	S42/S44	Email	A conclusion of no adverse effect has been predicted in Section 1.9.4.377 Assessment of adverse effects in-combination, based on the assumption that the absence of prey	Further detail has been provided to justify the conclusions of the assessment throughout Volume 2, Chapter 4: Marine mammals of the Environmental	No





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			will not impact marine mammals since they would also be displaced to potentially greater distances. However, this conclusion is dependent on recovery time of both receptors and no evidence regarding the length of time for fish species to return to the displaced area has been provided. This also differs from the conclusions made when assessing impacts on marine mammal disturbance from piling, where it was concluded that: "The impact (elevated underwater sound arising during piling) is predicted to be of regional spatial extent, medium term duration, intermittent and high reversibility (the impact itself occurs only during piling). Similarly, the effect of behavioural disturbance is reversible as receptors are expected to recover within hours/days." If recovery in marine mammals occurs within hours / days (and literature suggests it does for example Brandt et al.,2018), there may be an in-combination impact from loss of prey, and/or energetic costs of foraging in a different (potentially less preferred) area.	Statement and this is carried to the HRA Stage 1 Screening report and ISAA where necessary.	
Mon_060_021_010623	S42	Email	Marine Mammal Comments Over-arching Comments There are number of clarifications needed and some changes are requested for the final ES. In our review we have noted the following overarching issues: Maps should be included to better demonstrate proximity to key sites so to understand likelihood of impact on key marine mammal areas.	Figure 4.4. has been added to the Volume 2, Chapter 4: Marine mammals of the Environmental Statement to illustrate designated sites within the marine mammal study area.	No
Mon_060_022_010623	S42	Email	There are poor or unjustifiable arguments for the use of some marine mammal density estimates that need revision. The most precautionary estimate is typically the density that should be used unless there is strong justification to not do so.	Densities have been revisited in line with additional data provided post-PEIR. The assessment in Volume 2, Chapter 4: Marine mammals of the Environmental Statement uses the most robust estimate that provides a precautionary but accurate reflection of marine mammal densities. All densities have been presented to and agreed with the marine mammal EWG.	
Mon_060_023_010623	S42	Email	The position on mitigation options needs to be made clearer (although can be finalised at a later date), including the use of deflagration for UXO removal, setting strict vessel speed limits, and the use of piling noise mitigation technologies.	Measures adopted as part of the Mona Offshore Wind Project have been presented in Volume 2, Chapter 4: Marine mammals of the Environmental Statement including use of low order UXO clearance methods, limitations on vessel speed and consideration of NAS based on the information available at application. The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Consequently, if NAS is required a detailed exploration of available technologies will be undertaken and information presented to demonstrate how such technology would contribute to the reduction in underwater sound from piling. Project refinements and potential mitigation options will be considered within the Underwater Sound Management Strategy (USWMS), an outline of which has been submitted with the application for consent with a more detailed marine mammal mitigation protocol. The USWMS will be updated post-application, discussed and agreed with stakeholders.	
Mon_060_024_010623	S42	Email	There is a lack of justification for not conducting any marine mammal monitoring during construction and operation of the Mona Array.	An Offshore In-principle Monitoring Plan (Document Reference J15) has been included in the Mona Offshore Wind Project application, which will be discussed and agreed with stakeholders once there is a final detailed design agreed.	No
Mon_060_025_010623	S42	Email	A number of clarifications are needed to be able to accurately assess the arguments presented in the PEIR. Some arguments are poorly worded, poorly justified or based on unsupported data or arguments and need revision.	Further clarifications have been provided throughout Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No
Mon_060_026_010623	S42	Email	The use of Management Units (MUs) has not been appropriate in some applications and needs revision.	Volume 2, Chapter 4: Marine mammals of the Environmental Statement has been revised with respect to the relevant MUs for each species and the approach discussed and agreed with the marine mammal EWG.	No





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Mon_060_027_010623	S42	Email	Some assessments for cumulative impacts are unjustifiably low given the large number of projects planned in the region, and in some cases have been given the same scorings as the Mona project alone. This seems unlikely and needs revision.	The cumulative assessment within Volume 2, Chapter 4: Marine mammals of the Environmental Statement has been updated in line with additional information on projects within the relevant study areas. Assessments are based on best available information at the time and although it is acknowledged that there are a number of projects being progressed in the Irish Sea, this would not necessarily always lead to cumulative impacts if there is limited potential for spatial/temporal overlap. Each impact is assessed on a case by case basis.	No
Mon_060_028_010623	S42	Email	The use of noise abatement technology (e.g. bubble curtains) or quieter piling methods (e.g. hammer dampeners) has not been proposed as potential piling mitigation methods. We strongly recommend these are included as options in any draft mitigation plans.	The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Consequently, if NAS is required a detailed exploration of available technologies will be undertaken and information presented to demonstrate how such technology would contribute to the reduction in underwater sound from piling. Project refinements and potential mitigation options will be considered within the Underwater Sound Management Strategy (UWSMS), an outline of which has been submitted with the application for consent with a more detailed Marine Mammal Mitigation Protocol. The UWSMS will be updated post-application, discussed and agreed with stakeholders.	
Mon_060_029_010623	S42	Email	We recommend that UXO clearance is not included in the DCO/deemed marine license, and consent under a separate marine license is obtained once further information is available.	UXO clearance is included in this Application to capture the full suite of potential impacts from the Mona Offshore Wind Project. We do, however, acknowledge the limitations of the assessment at this stage and for this reason the final MMMP, post consent, will be produced on the basis of a more accurate understanding of the number and types of UXO requiring clearance and the type of clearance approach that will be appropriate to employ.	No
Mon_060_030_010623	S42	Email	Detailed Comments Volume 2, chapter 9: Marine Mammals General Comments Nearby protected areas designated for marine mammals should be added to all relevant maps included in the chapter to understand proximity to activities and potential for disturbance. Please also include a map (we would suggest alongside Figure 9.1 or in Section 9.4.5 alongside Table 9.10) specifically showing any marine mammal SACs alongside all of the Mona activity areas (Mona Array Area, Mona Cable Corridor, Mona Marine Mammal Study Area).	A figure showing the location of protected sites is included in the final Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No
Mon_060_031_010623	S42	Email	9.1.3 Study Area, 9.1.3.1 Can it please be clarified why the Mona marine mammal study area does not extend evenly around the Mona Array Area? The report mentions it was redefined following commencement of marine mammal surveys but does not explain why or how this affects the marine mammal survey results.	Additional clarification has been added to Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement. The spread of the buffer was due to refinements in the array area after the aerial surveys had commenced. To ensure consistency the surveys continued to fly the same area but the Mona Array Area had changed within that survey area.	No
Mon_060_032_010623	S42	Email	JNCC agree with the use of Management Units (MUs) for the regional marine mammal study area. We agree with previous EWG meeting outcome to screen in the Irish Sea extending to the Celtic Sea rather than the largest MU, based on likely receptor-pathways.	The MUs for each species have been discussed agreed via the marine mammal EWG with all consultees.	No
Mon_060_033_010623	S42	Email	9.3 Consultation Table 9.6: Summary of consultation activities undertaken for the Mona Offshore Wind Project relevant to marine mammalsFeb-22: use of digital aerial survey data: Coverage required for good survey and data quality is likely to be site specific, therefore stating that others have done 10% and been approved does not negate the need for power analysis to verify the survey method used. Coverage of Mona aerial	Further detail has been added to Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement to provide clarification. This approach has been widely applied to other windfarms in the UK and is accepted as a good standard. It is generally recommended to use data collected at finer spatial scales as this provides a truer reflection of marine	No



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			surveys is noted as at least 12%. It should be noted here at least a qualitative review of the coverage over the entire area, i.e. is coverage even and are key areas of the Mona array areas covered by the surveys? This is key to understand the value of the survey data. As has been stated in the EWG meetings several times, JNCC were not consulted on the design of the marine mammal surveys. JNCC do not agree with the approach of using combined bird and mammal surveys, as these are not suitably designed for marine mammals and are unlikely to provide sufficient data. This is evident in the poor data attained in the surveys, which has led to multiple issues in being able to effectively assess the impact of the Mona array on marine mammals.	mammal activity in the relevant area (as opposed to data that may have been collected over larger scales). As this is a digital aerial survey the approach to survey is the same for marine mammals and birds and the supporting analyses highlights the caveats that generally arise with the collection of marine mammal data. Given the known limitations of surveying marine mammals, the baseline assessment was supported by a detailed literature review of other data sources. As a result, higher densities have been used based on recently available data from Evans and Waggitt (2023) and as recommended by the marine mammal EWG.	
Mon_060_034_010623	S42	Email	9.4 Baseline environment 9.4.1.1, Table 9.7: Summary of key desktop reports. As noted in Table 9.8 on page 13, the site-specific digital aerial surveys were started in 2020. This was before consultation and agreement of methodology with the JNCC as part of the EWG. Section 9.4.4, Table 9.9: Summary of marine mammals baseline ecology page 14-15	Further detail has been added to Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement to provide clarification. This approach has been widely applied to other windfarms in the UK and is accepted as a good standard. It is generally recommended to use data collected at finer spatial scales as this provides a truer reflection of marine mammal activity in the relevant area (as opposed to data that may have been collected over larger scales). As this is a digital aerial survey the approach to survey is the same for marine mammals and birds and the supporting analyses highlights the caveats that generally arise with the collection of marine mammal data. Given the known limitations of surveying marine mammals, the baseline assessment was supported by a detailed literature review of other data sources. As a result, higher densities have been used based on recently available data from Evans and Waggitt (2023) and as recommended by the marine mammal EWG.	No
Mon_060_035_010623	S42	Email	Bottlenose dolphin: For consistency, justification and values used in the assessment should all be included in Table 9.9.	Justification for all densities have been discussed and agreed with the EWG and presented in Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement.	No
Mon_060_036_010623	S42	Email	Table 9.11 states a value of 0.035 animals per km2from the Irish Seas MU (IAMMWG, 2021). Please state justification for using this value alongside other justification in Table 9.9.	The densities used for the bottlenose dolphin assessment have been updated as per discussions through the EWG and the assessment now uses data from Evans and Waggitt (2023).	No
Mon_060_037_010623	S42	Email	Risso's Dolphin: JNCC agree with the use of adjacent Block E values of 0.031 animals km2 for the Mona marine mammal study area.	The Applicant notes your response.	No
Mon_060_038_010623	S42	Email	Short-beaked dolphin: JNCC agree with the use of Block O SCANS III data for short-beaked dolphin for the Mona marine mammal study area in the impact assessment.	The Applicant notes your response.	No
Mon_060_039_010623	S42	Email	Minke whale: JNCC do not agree with the use of SCANS III Block E estimates of 0.017 animals per km2for Minke whale impact assessment. Given the proximity to the Isle of Man MNR and the more conservative estimates above, JNCC recommend using the more conservative estimate of the UK wide mean density of 0.022 animals per 0.017 animals per km2.	Densities for marine mammal species have been presented and agreed with the EWG. Final agreement of densities has been agreed following technical note after EWG meeting 5 with NRW, NE, JNCC agreeing the density for minke whale. Therefore the use of the regional specific densities applied in the PEIR has been carried forward to the final Environmental Statement.	No
Mon_060_040_010623	S42	Email	Grey and harbour seal: It does not state here which of these values will be used in the impact assessment. JNCC recommend this is stated here clearly as well as in Table 9.11.	Further clarification has been provided on the correct values for the assessment in Volume 2, Chapter 4: Marine mammals of the Environmental Statement and a summary of densities and reference populations for Important Ecological Features presented in Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No
Mon_060_041_010623	S42	Email	9.6 Key parameters for assessment9.6.1 Maximum design scenario, Table 9.15: Maximum design scenario considered for the assessment of potential impacts on marine mammals JNCC agree with the potential impacts scoped in as presented in Table 9.15.	The Applicant notes your response.	No
Mon_060_042_010623	S42	Email	9.6.2, Table 9.16: Impacts scoped out of assessment JNCC agree with the impacts scoped out of the study.	The Applicant notes your response.	No



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_060_043_010623	S42	Email	9.7 Measures adopted as part of the Mona Offshore Wind Project Table 9.17: Measures adopted as part of the Mona Offshore Wind Project JNCC note that many of the marine mammal mitigation measures discussed in this table are "Proposed to be secured through a condition in the marine licence(s)". JNCC agree the requirement for marine mammal mitigation must be secured as a condition of consent, although the final mitigation plan for piling could be agreed post-consent when the design envelope is finalised, if all possible mitigation options are be considered in the ES to provide confidence that potential impacts can be mitigated. For example, the use of noise abatement technology (e.g. bubble curtains) or quieter piling methods (e.g. hammer dampeners) has not been considered and we strongly recommend these are included as options in any draft mitigation plan.	The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Consequently, if NAS is required a detailed exploration of available technologies will be undertaken and information presented to demonstrate how such technology would contribute to the reduction in underwater sound from piling. Project refinements and potential mitigation options will be considered within the Underwater Sound Management Strategy (UWSMS), an outline of which has been submitted with the application for consent with a more detailed Marine Mammal Mitigation Protocol. The UWSMS will be updated post-application, discussed and agreed with stakeholders.	
Mon_060_044_010623	S42	Email	We appreciate the inclusion of UXO clearance in the impact assessment as this provides a full picture of all activities associated with the project however too little is known regarding clearance requirements at the ES stage to be able to determine potential impacts which can be mitigated. JNCC recommend consent for UXO clearance is obtained via a separate marine license once investigative surveys have been completed. JNCC agree with the inclusion of low order techniques in this table but highlight this should be the preferred method not a clearance option. This applies to UXO measures mentioned in both the primary and tertiary measures section. JNCC highlight that the Governments joint interim position statement on UXO clearance is currently being updated and a consultation updating JNCC Guidelines for minimising risk of disturbance and injury to marine mammals whilst using explosives is planned for later this summer. We also highlight that soft starts are possible for some sub-bottom profiling equipment and it should not be assumed some form of ramp-up of power cannot be achieved when undertaking these surveys.	UXO clearance is included in this Application to capture the full suite of potential impacts from the Project and as such has been included in the DCO. The draft DCO submitted with the application for consent secures the requirement to provide the regulator with a UXO clearance method statement and marine mammal mitigation protocol (Document Reference J.16) for approval prior to commencement of clearance activities. Therefore, acknowledging the limitations of the assessment at this stage and for this reason the final MMMP, post consent, will be produced on the basis of a more accurate understanding of the number and types of UXO requiring clearance and the type of clearance approach that will be appropriate to employ. The assessment has to consider the maximum adverse scenario, which in this case is high order clearance. There is insufficient information available at present to be able to commit to low order techniques although the Applicant remains committed to using this as the preferred option over high order clearance.	
Mon_060_045_010623	S42	Email	9.8.3 Injury and disturbance from elevated underwater sound during piling9.8.3.24 MMMP (Tertiary mitigation)Due to the large injury ranges predicted using the cumulative Sound Exposure Level (SEL)metric for harbour porpoise and minke whale (Table 9.21), JNCC request the inclusion of noise abatement technologies such as bubble curtains in the draft mitigation plan for the duration of monopiling (and consideration for pin-piling) activities. This is in addition to the use of Acoustic Deterrent Devices (ADDs)as proposed in paragraph 9.8.3.24.	The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Consequently, if NAS is required a detailed exploration of available technologies will be undertaken and information presented to demonstrate how such technology would contribute to the reduction in underwater sound from piling. Project refinements and potential mitigation options will be considered within the Underwater Sound Management Strategy (UWSMS), an outline of which has been submitted with the application for consent with a more detailed Marine Mammal Mitigation Protocol. The UWSMS will be updated post-application, discussed and agreed with stakeholders.	
Mon_060_046_010623	S42	Email	9.8.2.22While we agree there are limitations with the SELcum method and the outputs will be precautionary, current best practice is to assess both metrics and JNCC consider there is currently insufficient evidence to depart from this approach.	Volume 2, Chapter 4: Marine mammals of the Environmental Statement has adopted the dual metric approach in line with the Southall et al (2019) guidance.	No
Mon_060_047_010623	S42	Email	Table 9.22: Summary of peak pressure (SPLpk) injury ranges at hammer initiation for marine mammals due to single piling of monopiles at 5,500kJ hammer energy and pin piles at 2,800kJ hammer energy, showing whether the individual can flee the injury range during the 30 minutes of ADD activation. Numbers in parentheses are the injury ranges at full hammer energy. JNCC agree with the fleeing speeds used.	These fleeing speeds have been taken forward for Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No





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Mon_060_048_010623	S42	Email	9.8.3.27This paragraph states "The assessment also shows that the use of an ADD reduced the maximum injury zones based on the SELcum metric at monopiles and pin piles with respect to harbour porpoise and minke whale": The use of ADDs doesn't reduce the maximum injury zone. The maximum injury zone is still present as no noise dampening devices have been suggested for use to reduce noise propagation. The use of ADDs reduces the risk of an animal being present within a defined area through deterrence and therefore the risk of PTS occurring.	Text has been amended in Volume 2, Chapter 4: Marine mammals of the Environmental Statement to highlight that it is the risk of injury that is being reduce by deterring animals from the predicted injury zone.	No
Mon_060_049_010623	S42	Email	Behavioural disturbance, page 39As noted in previous comments, please provide a map in this section showing the nearest designated sites to help visualise proximal sites. Please also provide a map of potential disturbance contours mentioned here, including the designated sites. Impacting 6% of the bottlenose dolphin population, however temporarily, is a significant number in the context of the MU. As no mitigation has been employed beyond ADDs, JNCC do not agree that the magnitude is low. Please revise the assessment. It is argued throughout this section that all of the population densities used have been conservative e.g. choosing Block E SCANS III data over lower density Block F data. We advise that the survey assessments of population densities are conservative in themselves. For example, SCANS surveys are a snapshot in time on survey days, and DAS are similarly limited in coverage, accuracy, and ability to identify to species level. Unfortunately, these are the best data available for densities. Arguing that all the estimates are over-cautious is therefore not validation for dismissing the outputs of this assessment, as the precautionary approach must be taken because of the data limitations. Please revise all text dismissing the outputs as over-precautionary in this manner, as it is misleading. W	Thank you for your detailed feedback. We have included a map of designated sites for marine mammals with noise contours overlaid in the Volume 2, Chapter 4: Marine mammals of the Environmental Statement to help visualise the proximity to these sites. Regarding the text around the precautionary nature of the assessment. It is important to provide this context in the assessment as the resulting quantification of magnitude is a result of layers of conservatism at each stage of the assessment (e.g. development of the MDS, conservative assumptions in the noise modelling, and conservative nature of the assessment). It is not the intention to use this as a justification of dismissing the outcomes and therefore the text will be reviewed to ensure that this is not the message that is being relayed. Given that the densities have been amended for Volume 2, Chapter 4: Marine mammals of the Environmental Statement we have revisited all the impact assessments. For all species the assessment takes into account both the spatial and temporal nature of the effect. Disturbance arising from underwater sound could disrupt normal behaviours but where such an event is short lived and reversible in the context of the life span of a species this is also taken into account. For the final assessment an average density for bottlenose dolphin across the entire study area has been applied (rather than only considering densities within a coastal buffer) and therefore our assessment has been updated within Volume 2, Chapter 4: Marine mammals of the Environmental Statement. However, overlap with key habitats for the species has been considered, including the inshore coastal waters around Wales/NW England and the IoM and consider the movement of animals between these habitats (and potential for barrier effects).	
Mon_060_050_010623	S42	Email	e also disagree with the assumption that the extent of disturbance from piling is likely to be over-estimated due to noise losing its impulsive characteristics with range. The disturbance assessment has been undertaking using a dose response curve which was generated based on field observations, where animals may/will react to the noise received at that location. As a result, the curve accounts for differences in behaviour relative to an individuals distance from the noise source. We would advise that the assessments in this section are reviewed. The magnitudes are likely to be higher, but residual impacts could be lowered by implementing noise abatement technology.	The dose response is based on observed probability of a behavioural response during piling. Distance from an impulsive sound source is a strong predictor of a behavioural response due to how sound propagates, how the waveform of impulsive noises elongates with distance and reflects the current understanding of the transition from impulsive to continuous sound. The dose response curve from measurements taken at the Beatrice offshore wind farm was based on a piling at a much smaller maximum hammer energies and over distances not exceeding 60 km. As a comparison, the distance at which a 50% response was measure for the Beatrice OWF was 7.4 km at the first location piled (Graham et al 2019) compared to an approximate range of 27 to 42km for the Mona Offshore Wind Project, depending on the transect. Therefore, whilst our assessment applies the dose response as the best available estimate of proportional responses, it is considered to be highly conservative due to the propagation distances predicted for the Mona Offshore Wind Project which for a given sound level will not be equivalent in characteristics to those found at the Beatrice OWF. We refer to the 143dB unweighted threshold (from Tougaard, 2021) recommended by NRW which is based on a collation of field studies of harbour porpoise response to elevated subsea noise from piling. The 143 dB re 1μPa represents a precautionary threshold at which animals are likely to respond and demonstrates that any behavioural effects beyond this point are	



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				likely to be mild. We have added further text to the assessment to explain the caveats with applying the dose response and the use of the 143 dB re $1\mu Pa$ threshold is helpful in providing additional context.	
Mon_060_051_010623	S42	Email	9.8.4 Injury and disturbance to marine mammals from elevated underwater sound during UXO clearance9.8.4.7 and Table 9.25: Potential PTS ranges for Low Order and Low Yield UXO clearance activities Both the text and table refer to 'low yield' clearance activities. This is not a term recognised in current UXO assessments and no evidence has been published demonstrating a reduction in underwater noise for a 'low yield' clearance method. We recommend that all use of this phrase is removed.	Low order and low yield are two different types of clearance approaches and required different charge sizes for clearance, therefore both types have been modelled and assessed with respect to marine mammals. Low yield UXO is language used in guidance and therefore used in the assessment. Low yield is a term communicated to the project by clearance contractors. This term has been carried forward to the Application and described in Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement.	
Mon_060_052_010623	S42	Email	9.8.4.42 Significance of effect –auditory injury It is not known at this stage exactly how many UXOs will require clearing, what type of devices will be present or what methods can be employed to clear individual devices. We assume this information will not be available in the final ES? When proving advice to regulators we must consider the worst-case scenario. Without detailed information, the worst-case scenario currently is that all devices will be the largest possible (907kg) and have to be cleared by high order. The predicted injury range for harbour porpoise from such a clearance is more than 15km. This cannot be mitigated. We therefore disagree with the conclusion that UXO clearance will be a minor adverse significance and not significant in EIA terms. While we appreciate including UXO clearance in the impact assessment, we recommend this activity is not included in the DCO/deemed marine license and consent is obtained via a separate marine license application post-consent, once more information is available on clearance requirements. This will enable you to refine this assessment and propose appropriate mitigation. We highlight that the Governments Joint Position Statement on UXO clearance will be updated later in this year and that consultations to support this will take place over the summer. We recommend you monitor this situation and incorporate any relevant outputs into the final ES.	UXO clearance has been included in this Application to capture the full suite of potential impacts from the Project. The Applicant acknowledges the limitations of the assessment at this stage and therefore the final MMMP, post consent, will be produced on the basis of a more accurate understanding of the number and types of UXO requiring clearance and the type of clearance approach that will be appropriate to employ. The assessment has considered the maximum adverse scenario, which in this case is high order clearance. There is insufficient information available at present to be able to commit to low order techniques although the Applicant remains committed to using this as the preferred option over high order clearance where possible. Further to the advice received here and following the application of a more precautionary density estimate for harbour porpoise which has led to an increase in the predicted number of animal potentially affected by PTS (unmitigated) we have revisited our impact assessment and, subject to the caveats and assumptions highlighted, have revised the magnitude to moderate for harbour porpoise and therefore concluded a significant effect with respect to high order clearance of UXOs. We anticipate that with appropriate mitigation measures adopted following a more detailed understanding of the UXO clearance requirement the risk of injury will be reduced and approval of any such mitigation has been secured through the Draft DCO (Document reference J.16) and will be presented as part of a post-consent plan.	
Mon_060_053_010623	S42	Email	9.8.5 Injury and disturbance to marine mammals from elevated underwater sound due to vessel use and other activities 9.8.5.12 Justification as to why Temporary Threshold Shift estimates are considered overestimates should be included.	We have provided further discussion in Volume 2, Chapter 4: Marine mammals of the Environmental Statement of why TTS is considered to be overestimates.	No
Mon_060_054_010623	S42	Email	9.8.5.18We disagree with the assumption that there is no distinction between mild and strong disturbance when applying the level B harassment threshold for continuous noise, and that it can be assumed that not all animals found within predicted ranges would be disturbed. Fixed noise thresholds are set based on behavioural data to assume disturbance will occur beyond at or above this level. Thus a 100% rate of disturbance should be assumed when applying a fixed noise threshold.	There is no differentiation in minor/major disturbance for continuous sound, such as shipping, just one single threshold (120dB) for a level B harassment. Reference to NMFS 2005 has been added and text has been updated to clarify. In addition the modelling does not account for any background noise levels which may exceed 120dB. The vessel sound assessment has been updated to provide further context to understand the magnitude of this impact.	No
Mon_060_055_010623	S42	Email	9.8.5.32Care should be taken when using the term habituation and this should not be assumed if a measured metric is shown to have little effect. When discussing the Thompson et al 2011 modelling, the statement that development 'did not have a negative effect' should be changed to 'would not', as this report presents modelling undertaken prior to any wind farm construction within the Moray Firth.	Text has been amended in Volume 2, Chapter 4: Marine mammals of the Environmental Statement with respect to the Thompson et al (2011) reference and also with respect to the use of 'habituation'.	No
Mon_060_056_010623	S42	Email	9.8.6, Increased risk of injury of marine mammals due to collision with vessels9.8.6.4 It would be very useful to know what the typical baseline is to indicate the proportional increase in vessel traffic that 2,004 return trips would represent. Please add this data for comparison. It should also be made clear whether vessel speed limits will be enforced	We have provided further discussion in Volume 2, Chapter 4: Marine mammals of the Environmental Statement of why TTS is considered to be overestimates. There is no differentiation in minor/major disturbance for continuous sound,	No





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			as part of the "measure adopted as part of the Mona Offshore Wind Project". If there are to be clear vessel speed limits to 14 knots, or other speed limits based on vessel size, this should explicit. Without this, there is little justification for the "low" magnitude stated in 9.8.6.6.	such as shipping, just one single threshold (120dB) for a level B harassment. Reference to NMFS 2005 has been added and text has been updated to clarify. In addition the modelling does not account for any background noise levels which may exceed 120dB. The vessel sound assessment has been updated to provide further context to understand the magnitude of this impact. Text has been amended in Volume 2, Chapter 4: Marine mammals of the Environmental Statement with respect to the Thompson et al (2011) reference and also with respect to the use of 'habituation'.	
Mon_060_057_010623	S42	Email	9.8.6.7 –9.8.6.12There are contradictions within and between these paragraphs that are poorly worded and therefore confusing, for example,	Point noted and responded to in the examples provided in following comments.	No
Mon_060_058_010623	S42	Email	"Marine mammals are generally able to detect and avoid vessels"	Added additional context and citation to clarify the statement that marine mammals are able to detect and avoid vessels in Volume 2, Chapter 4: Marine mammals of the Environmental Statement	No
Mon_060_059_010623	S42	Email	"Vessel strikes are known to be a cause of mortality in marine mammals (Carrillo and Ritter, 2010), and it is possible that mortality from vessel strikes is under-recorded (Van Waerebeek et al., 2007)"	Expanded on this point and added citation to support statement in Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No
Mon_060_060_010623	S42	Email	"All marine mammal receptors would be highly vulnerable to a collision, and the effect could potentially cause a change in both reproduction and survival of individuals."	Amended wording in this sentence to provide further clarity and justification in Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No
Mon_060_061_010623	S42	Email	"All marine mammals are deemed to have some tolerance (largely due to avoidance behaviour)":	This point has been expanded in paragraph 4.8.6.12/13 and removed use of tolerance and replaced with argument of avoidance behaviour and not all collisions are fatal.	No
Mon_060_062_010623	S42	Email	"tolerance" of vessel strikes is possibly not the correct term –survivability (from a strike) may be better.	The word 'tolerance' has been removed and replaced with resilience/survivability, in Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No
Mon_060_063_010623	S42	Email	We suggest this section be re-worded to make the arguments clear. However, we do not disagree that the magnitude of the impact is low, the sensitivity medium.	Thank you for specific comments on this section. We have made amendments in Volume 2, Chapter 4: Marine mammals of the Environmental Statement.	No
Mon_060_064_010623	S42	Email	9.8.7 Injury and disturbance to marine mammals from elevated underwater sound during site investigation surveys Given the information stated on the potential impacts of surveys on marine mammals in paragraphs 9.8.7.16, page 71 to paragraph 9.8.7.28, page 72, the comment "It is expected that, to some extent, marine mammals will be able to adapt their behaviour to reduce impacts on survival and reproduction rates and tolerate elevated levels of underwater sound during site investigation surveys" is unjustified. If this is an argument taken forward, it must be justified in the text prior. Otherwise, it should be removed.	conclusion of magnitude.	No
Mon_060_065_010623	S42	Email	9.8.10 Future Monitoring 9.8.10.1JNCC advise that this approach needs justification.	An Offshore In-principle Monitoring Plan (Document Reference J15 has been included in the Mona Offshore Wind Project application, which will be discussed and agreed with stakeholders once there is a final detailed design agreed.	No
Mon_060_066_010623	S42	Email	9.9 Cumulative effects assessment methodology Table 9.42We recommend the inclusion of Project Valorous to the list of screened-in projects this is currently in preapplication phase.	Project Valorous has been added to the CEA long list of projects and considered in assessments in Tier 3 where relevant. https://www.bluegemwind.com/our-projects/valorous/	No
Mon_060_067_010623	S42	Email	9.10 Cumulative effects assessment 9.10.2.7We do not agree that disturbance from noise levels <150dB can be considered "mild". Please refer to ASCOBANS and other relevant documentation on noise thresholds for piling and amend this and any other mentions of this in the PEIR. In line with previous advice on other projects, and as noted in comments above, we always recommend the use of the most precautionary estimates		No





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			of species density, as there is uncertainty in all survey methods and results. It is scientifically inaccurate and biased to call lower density estimates "more realistic". Justification of impacts by using the lower densities of harbour porpoise in the JCP III tool used for the assessment at Awel y Môr is therefore inappropriate and should be removed. Any reference or justification using this argument should be removed from the PEIR.	there is layered precautionary assumptions to allow for a conservative assessment and for the CEA this means taking forward all the maximum design scenarios and most precautionary assessments for each project. It is important to highlight this is approach in our assessment to provide a level of realism in interpretation of the magnitude. For Awel y Mor, for example, whilst we use the higher density (1.0 animals/km2) to inform the magnitude we also discuss in the context of the density Awel y Mor submitted (as agreed with consultees) to be the most appropriate for the assessment based on JCP data (0.13 animals/km2).	
Mon_060_068_010623	S42	Email	9.10.2.20This is a confusing approach to iPCoD modelling. This approach for bottlenose dolphin needs to be justified better here. MUs, by definition, should be considered separately and not combined unless strong justification to do so is provided. Please amend or justify this approach further.	For bottlenose dolphin the agreed approach with the EWG was to considered cumulative projects only within the Irish Sea MU and therefore the Offshore Channel and Southwest England MU (and projects in this MU) is no longer included within the cumulative study area for this species.	No
Mon_060_069_010623	S42	Email	9.10.2.22Given that the impact on harbour porpoise is assessed as low magnitude for piling from the Mona project alone (9.8.3.30, page 39, and 9.8.3.47, page 41), you would expect the impact of these other, large, combined concurrent projects would be higher than "low". We recommend this assessment is revised or better justified.	The assessment has been reviewed in light of new projects that have come forward since PEIR and is based on iPCoD modelling. Behaviour effects are considered to be reversible and temporary and therefore the addition of other plans of projects does not in itself justify a higher impact level as the effects are considered at a population level and conclusions determined on this basis.	No
Mon_060_070_010623	S42	Email	9.10.2.24Given the declining population of bottlenose dolphin in this region, it is concerning to see the outcome of medium magnitude for piling noise. In light of this, we would again strongly advise the use of further noise mitigation beyond ADDs, such as noise abatement technology.	The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Consequently, if NAS is required a detailed exploration of available technologies will be undertaken and information presented to demonstrate how such technology would contribute to the reduction in underwater sound from piling. Project refinements and potential mitigation options will be considered within the Underwater Sound Management Strategy (UWSMS), an outline of which has been submitted with the application for consent with a more detailed Marine Mammal Mitigation Protocol. The UWSMS will be updated post-application, discussed and agreed with stakeholders.	
Mon_060_071_010623	S42	Email	9.10.2.58We agree with and encourage the approach of discussing further mitigation through the EWG, as we would advise further noise mitigation to be used.	The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Consequently, if NAS is required a detailed exploration of available technologies will be undertaken and information presented to demonstrate how such technology would contribute to the reduction in underwater sound from piling. Project refinements and potential mitigation options will be considered within the Underwater Sound Management Strategy (UWSMS), an outline of which has been submitted with the application for consent with a more detailed Marine Mammal Mitigation Protocol. The UWSMS will be updated post-application, discussed and agreed with stakeholders.	
Mon_060_072_010623	S42	Email	9.10.3 Injury and disturbance from pre-construction site investigation surveys9.10.3.4 Significance of effect Similar to the cumulative assessment for piling on harbour porpoise (9.10.2.12, page 90), it seems unlikely that the cumulative magnitude of projects is the same as the magnitude for Mona alone, and suggest this is reviewed or justified.	The approach to assessment of site investigation surveys has been updated for the application and considers a maximum number of site investigation surveys that may occur at the same time as those within the Mona Offshore Wind Project boundary. As per previous response, the addition of other plans or projects is not in itself a justification for increasing level of magnitude. This	





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				is particularly so for SI surveys which are likely to lead to relatively localised and short term effects n the context of the CEA study area and therefore considered unlikely to result in a population level response.	
Mon_060_073_010623	S42	Email	9.4.4 Injury and disturbance from underwater sound from UXO detonation Please refer to previous comments on UXO clearance.	UXO clearance is included in this Application to capture the full suite of potential impacts from the Mona Offshore Wind Project. We do, however, acknowledge the limitations of the assessment at this stage and for this reason the final MMMP, post consent, will be produced on the basis of a more accurate understanding of the number and types of UXO requiring clearance and the type of clearance approach that will be appropriate to employ. The assessment has to consider the maximum adverse scenario, which in this case is high order clearance. There is insufficient information available at present to be able to commit to low order techniques although the Applicant remains committed to using this as the preferred option over high order clearance. Further to the advice received here we have revisited our impact assessment and, subject to the caveats and assumptions highlighted, have revised the magnitude to medium for harbour porpoise and therefore concluded a significant effect with respect to high order clearance of UXOs.	Yes
Mon_060_074_010623	S42	Email	9.10.5 Injury and disturbance from vessel use and other (non-piling) sound producing activities The disturbance ranges for vessel noise are quite high for Mona alone (22km, Table 9.37, page 63), let alone cumulatively with surrounding projects. In addition, an assumption is made that: "Introduction of vessels during construction and operations and maintenance phases of the projects will not be a novel impact for marine mammals present in the area and therefore marine mammals are anticipated to demonstrate some degree of habituation to sound from vessels." (9.10.5.23, page 108). This is not supported by literature and is a weak argument. Indeed, noise from industry is increasing everywhere in UK waters and there is no evidence to suggest the cumulative noise levels are not having an impact on marine mammal fitness. We advise that "habituation" is being used incorrectly, and is misleading in suggesting it will have little to no impact. Vessel noise is assessed to be long term (9.10.5.24, page 108) and the sensitivity of marine mammals is assessed as medium (9.10.5.27, page 108), yet cumulative impact is still deemed "low". Again, justification needs to be provided for assessing cumulative impact as low.	Additional information on vessel noise has been included in Volume 2, Chapter 4: Marine mammals of the Environmental Statement and this includes further context of vessel activity against background levels of vessels from Volume 6, Annex 7.1: Navigational Risk Assessment of the Environmental Statement. This provides further justification for the conclusions of the CEA. Text around the use of the word 'habituation' has been amended.	No
Mon_060_075_010623	S42	Email	9.11 Future monitoring 9.11.1.1JNCC advise that this approach needs justification.	An Offshore In-principle Monitoring Plan (Document Reference J15) has been included in the Mona Offshore Wind Project application, which will be discussed and agreed with stakeholders once there is a final detailed design agreed.	No
Mon_060_076_010623	S42	Email	9.13 Summary of impacts, mitigation measures and monitoring As noted throughout these comments, JNCC advise that noise abatement technology should be considered to reduce impacts of piling noise. The sensitivity of some receptors is high, and magnitude of impacts should not be assessed as low or negligible in all cases. Mitigation should be added to Table 9.55 for underwater noise, and this should be consulted on and agreed with the EWG at a later date.	The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Consequently, if NAS is required a detailed exploration of available technologies will be undertaken and information presented to demonstrate how such technology would contribute to the reduction in underwater sound from piling. Project refinements and potential mitigation options will be considered within the Underwater Sound Management Strategy (UWSMS), an outline of which has been submitted with the application for consent with a more detailed Marine Mammal Mitigation Protocol. The UWSMS will be updated post-application, discussed and agreed with stakeholders.	





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Mon_060_077_010623	S42	Email	Volume 5, annex 3.1: Underwater sound technical report1.7.3.13, UXO clearance. As stated previously, the use of low noise methods such as deflagration is the preferred method of clearance, in line with the UXO clearance interim position statement. Please refer to previous comments on UXO clearance.	Low order and low yield are two different types of clearance approaches and required different charge sizes for clearance, therefore both types have been modelled and assessed with respect to marine mammals. Further clarification has been provided in Volume 5, Annex 3.1: Underwater Sound technical report of the Environmental Statement. This has been discussed through the marine mammal expert working group and described in Volume 1, Chapter 3: Project Description of the	No
				Environmental Statement.	
Mon_060_080_010623	S42	Email	Habitats Regulations Assessment Stage 2 Information to Support an Appropriate Assessment Note: In line with JNCCs offshore remit, our comments focus on harbour porpoise SACs and we defer to NRW regarding sites within Welsh territorial waters i.e. those for bottlenose dolphin and seals.	Comment noted	No
Mon_060_081_010623	S42	Email	1.5 Summary of LSE screening conclusions1.5.3.6, LSE in-combination for Annex II marine mammals "A precautionary approach to selection of relevant sites for Annex II marine mammals was adopted in the HRA Stage 1 Screening Report. As marine mammals are highly mobile animals with the potential to forage over wide areas, all European sites for marine mammal features with a range that overlaps with the Mona Offshore Wind Project were considered. "This is not the advised approach to screening in sites for HRA. To screen in sites, please use the relevant Management Unit (MU). Please change the approach and alter all relevant documents accordingly to use the correct screening process.	Marine mammal Management Units have been used to identify European Sites to assess for a potential LSE as a result of the Mona Offshore Wind Project. The relevant foraging ranges of Annex II marine mammal features have also been presented and considered, to ensure all relevant European Sites have been identified.	No
Mon_060_082_010623	S42	Email	1.9 Assessment of potential Adverse Effect on integrity: Annex II marine mammals Figure 1.11:Location of European Sites designated for Annex II marine mammal features for which an Appropriate Assessment is required. As noted in the comments on "Volume 2, Chapter 9, Marine Mammals", it would be useful to see this or a similar map of the Mona Array Area and Mona Offshore Cable Corridor with nearby protected areas of interest in Chapter 9, for reference.	A figure showing the European Sites considered in the HRA and Mona Offshore Wind Project infrastructure has been added to Volume 2, Chapter 4: Marine mammals of the Environmental Statement	No
Mon_060_083_010623	S42	Email	Injury and disturbance from underwater sound generated during piling, page 147Please refer to previous comments on these sections of the impact assessment, which will also apply here as it supports the HRA conclusions.	Comments on Volume 2, Chapter 4: Marine mammals of the Environmental Statement have been reviewed and text has been updated where required.	No
Mon_060_084_010623	S42	Email	Table 1.100, Maximum design scenario considered for the assessment of potential impacts on marine mammals from injury and disturbance from underwater sound generated during piling during the construction phase. In the construction phase the table notes that there will be "up to 68 wind turbines [monopiles]", whereas elsewhere it is quoted as up to 70. Please clarify if this is correct and amend if needed.	Monopiles have been removed from the Project Design Envelope for the final Application. All numbers for jacket foundations have been checked for consistency.	Yes
Mon_060_085_010623	S42	Email	Table 101:Measures adopted as part of the Mona Offshore Wind Project relevant to the assessment of adverse effect on European sites designated for Annex II marine mammal features from underwater sound during the construction phase. As previously commented, noise abatement technology should be listed as a potential measure to reduce the impact of underwater noise. This is especially important given the impact ranges mentioned in Volume 2, Chapter 9 and in the Underwater sound technical report and will help support a conclusion of no adverse effect on the North Anglesey Marine SAC.	The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Consequently, if NAS is required a detailed exploration of available technologies will be undertaken and information presented to demonstrate how such technology would contribute to the reduction in underwater sound from piling. Project refinements and potential mitigation options will be considered within the Piling Schedule, an outline of which has been submitted with the application for consent with a more detailed marine mammal mitigation protocol. The Piling Schedule will be updated post-application, discussed and agreed with stakeholders.	





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_060_086_010623	S42	Email	Injury and disturbance from underwater sound generation from unexploded ordnance (UXO) detonation, page 165Please refer to previous comments on UXO clearance. We do not believe there is sufficient information available at this stage to conclude no adverse effect on the North Anglesey Marine SAC from UXO clearance.	As per response to comments on the Chapter, we have revisited the assessment on UXO and updated accordingly. Updates have also been carried forward to the HRA.	No
Mon_066_036_020623	S42	Email	We recommend that a Statement of Common Ground (SoCG) is started by the Applicant early within the EPP, to accurately catalogue all areas of agreement for the project and highlight any areas of disagreement. ETG consultation/agreement logs have been successfully used by other projects as the foundation for the SoCG.	The Applicant will develop Statement of Common Ground with all key stakeholders during the examination phase.	No
Mon_066_037_020623	S42	Email	Best Practice Advice for Offshore Wind Natural England has produced a series of documents to provide Environmental Assessments: Best Practice Advice for Evidence and Data Standards for offshore wind farm development in English inshore and offshore waters. The advice is provided in a series of documents which range from baseline characterisation surveys and pre-application engagement, through to expectations at application and post-consent monitoring.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_038_020623	S42	Email	The project is divided into four phases: Baseline characterisation surveys Pre-application engagement and the evidence plan process Data and evidence expectations at examination Post-consent monitoring and other environmental requirements.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_039_020623	S42	Email	The above link also provides access the Nature Conservation Considerations and Environmental Best Practice for Subsea Cables for English Inshore and UK Offshore Waters. This project provides Natural England and JNCCs joint environmental best practice advice for subsea cable projects in English inshore and UK offshore waters.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_040_020623	S42	Email	It is the expectation that developers follow our Best Practice through the application and consenting process. As such our advice and recommendations to the PEIR are framed around this advice.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_041_020623	S42	Email	If you have any issues using SharePoint Online, please contact the site owners or contact: REDACTED	The Applicant notes your response.	No
Mon_066_044_020623	S42	Email	Natural England's Structure/Framework for Attributing Risk. The comments provided within this letter and its Annexes have been colour coded using the structure/framework as specified in the risk table in Appendix I of this letter. In this letter, the coloured headings are coded based on the highest risk associated with the topic in question. Natural England would like to highlight that at this stage all comments highlighted as yellow, amber, or red need to be addressed, with the potential for these issues to become more significant if not resolved at application.	The Applicant notes your response.	No
Mon_066_045_020623	S42	Email	Impacts on the Natural Environment–Natural England's Key Concerns Generic Issues - MARKED RED BASED OFF THEIR APPENDIX Natural England highlights that for several receptors, the PEIR is based on incomplete data (offshore ornithology, marine mammals) or refers to additional data collection that is not presented or still to be carried out (physical processes, benthic ecology). Natural England cannot therefore make any conclusive judgements based on this PEIR, including the cumulative/in-combination assessments and the HRA. Accordingly, our advice focuses on the methodology used. We emphasise the need to base the submitted ES on robust datasets that meet (and where appropriate exceed) minimum standards, for example marine mammal and offshore ornithology impact assessments should be based on at least 24 monthly surveys.	The Environmental Statement has been based on robust datasets that meet/exceed minimum standards. For marine mammals and offshore ornithology assessments, two years of aerial survey data is presented and analysed (Volume 2, Chapter 4: Marine mammals chapter; Volume 2, Chapter 5: Offshore ornithology chapter). The benthic and physical processes assessments have been informed by 2022 and 2023 intertidal surveys, and 2021 and 2022 subtidal benthic surveys (Volume 2, Chapter 1: Physical processes chapter; Volume 2, Chapter 2: Benthic subtidal and intertidal ecology chapter).	No
Mon_066_046_020623	S42	Email	We also highlight the risks associated with further data processing to validate the conclusions and having sufficient time to consult pre-application and sufficiently resolve matters prior to submission. We reserve the right to change our comments and position	Noted. The Applicant confirms that the timetable set out for DCO submission allows for evidence standards to be met.	No





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			during the ES consultation, subject to the outcome of further data analysis. Furthermore, Natural England seeks confirmation that the timetable set out for DCO submission allows for evidence standards to be met.		
Mon_066_047_020623	S42	Email	Please note that Natural England defer to Natural Resources Wales as the relevant statutory consultee in some instances. This is reflected by the use of a Purple RAG rating in our advice.	The Applicant notes your response.	No
Mon_066_049_020623	S42	Email	Marine Mammals - MARKED ORANGE BASED OFF THEIR APPENDIX As noted above, only the first year of survey data has been included in the PEIR. Natural England cannot therefore make any conclusive judgements based on this PEIR and accordingly, our advice focuses on the methodology.	Two years of data has been included in Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement in addition to a comprehensive review of desk top sources. Subsequently the densities applied to the assessment (which have been approved by the marine mammal EWG) have been updated to the Welsh Marine Mammal Atlas for harbour porpoise and bottlenose dolphin (Evans and Waggitt, 2023).	No
Mon_066_050_020623	S42	Email	Natural England do not agree that30min ADD should be included in the underwater noise modelling to predict impact ranges for the assessment. Natural England advises that the assessment should be based on the underwater noise modelling without ADDs and revise any assessments, including cumulative and HRA, that are based on the predicted ranges with 30min ADDs.	The assessment in Volume 2, Chapter 4: Marine mammals of the Environmental Statement presents the ranges both without ADD and with ADD, the latter providing evidence to demonstrate the potential efficacy of using ADD as a tool in the mitigation strategy.	No
Mon_066_051_020623	S42	Email	The use of noise abatement technology such as bubble curtains has not been proposed as potential mitigation method. Given the sizes of the impact ranges predicted by Underwater sound technical report (volume 3, annex 3.1), we would strongly recommend that these are considered within the MMMP along other potential mitigation measures.	The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Consequently, if NAS is required a detailed exploration of available technologies will be undertaken and information presented to demonstrate how such technology would contribute to the reduction in underwater sound from piling. Project refinements and potential mitigation options will be considered within the Underwater Sound Management Strategy (UWSMS), an outline of which has been submitted with the application for consent with a more detailed Marine Mammal Mitigation Protocol. The UWSMS will be updated post-application, discussed and agreed with stakeholders.	
Mon_066_052_020623	S42	Email	In certain cases, assigned magnitude score for irreversible auditory injury (PTS) is too low and should be revised in line with the provided magnitude definitions.	The assessment in Volume 2, Chapter 4: Marine mammals of the Environmental Statement has been revisited for all impacts and amendments made on the basis of project refinements and the best available evidence. Further justification has been provided throughout to support the conclusions of the assessment.	No
Mon_069_014_010623	S42	Email	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.	Comment noted and the information in the MMEA has been referenced in the Benthic subtidal and intertidal ecology technical report of the Environmental Statement to characterise the wider regional benthic subtidal and ecology study area. The MMEA is further referred to within Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement, and Volume 2, Chapter 4: Marine mammals of the Environmental Statement and Volume 6, Annex 4.1: Marine mammals technical report of the Environmental Statement (3.4 (a) Marine Mammals - Cetaceans and 3.4 (b) Seals).	
Mon_069_079_010623	S42	Email	Chapter 9 Marine Mammals Technical Report Table 1.1.Indicates the following: IoM government submission: Refer to the Manx Marine Environmental Assessment (MMEA) which provides a useful overview of the Island's marine environment and should be taken into account as part of both the	We have included the MMEA in our technical report - both 3.4 (a) Marine Mammals - Cetaceans and 3.4 (b) Marine Mammals - Seals.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			transboundary and possibly also the cumulative impacts assessment as part of this application. Response: MMEA included in the baseline desktop review.		
Mon_069_080_010623	S42	Email	Table 1.2:Summary of key desktop sources: MMEA is not listed as a reference source.	MMEA has been added into Table 4.5 in Volume 2, Chapter 4: Marine mammals of the Environmental Statement and in Table 1 in Volume 6, Annex 4.1: Marine Mammal Technical Report.	No
Mon_069_081_010623	S42	Email	1.5.13 SMRU Seal Surveys'1.5.13.3.'A SMRU report was commissioned to support the baseline assessment for the Mona Offshore Wind Project (Wright and Sinclair, 2022; Appendix B). The following sections provide a brief account of the surveys carried out for seals and the data is presented in Appendix B.' Note: While this report is indicated as Appendix B 'SMRU seal haul-out and telemetry data in relation to the Mona Array Area', the actual report title is 'Seal haul-out and telemetry data in relation to the Morgan Offshore Wind Project Generation Assets'.	Volume 2, Chapter 4: Marine mammals of the Environmental Statement has provided the correct report in reference to the Mona seal telemetry study.	No
Mon_069_082_010623	S42	Email	It appears to be the same report as for that project, and so comments on it, from an Isle of Man government perspective, are the same.	The Applicant notes your response.	No
Mon_069_083_010623	S42	Email	However, acknowledging the underlying data for this report, it is also a specifically commissioned component for the development, but appears to completely exclude Isle of Man, which is the closest seal population to the development –see below.	Further detail has been added to Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement to highlight that the telemetry covers IoM but is based on the data that SMRU holds	No
Mon_069_084_010623	S42	Email	Acknowledging inclusion of MWT seal data at 1.5.17(and Figures 1.8-1.10) in the Technical Report: (hiips://www.mwt.im/terrestrial/calf-man-bird-observatory); how have the two data analyses SMRU and MWT data been combined/compared for equivalent analysis?	Further quantitative detail for IoM populations from MWT/MWDW, haul out locations.	No
Mon_069_085_010623	S42	Email	However, the Manx Wildlife Trust seal data set does not appear in Table 9.7of the PEIR –please clarify.	We have added MWT/MDWD into desktop reports in Volume 6, Annex 4.1: Marine Mammal Technical Report of the Environmental Statement.	No
Mon_069_086_010623	S42	Email	Overall, please confirm the equivalent treatment of Manx and non-Manx seal populations as part of the PEIR assessment?	Clarifications have been added to Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement based upon availability of data from SMRU and the Isle of Man (discussed and agreed with IoM stakeholders in EWG meeting 5).	No
Mon_069_087_010623	S42	Email	Amend as per highlights 1.6.1.5 For the Isle of Man, the 1990 Wildlife Act is the primary wildlife protection legislation and sets out schedules of Manx species of animal and plant that are legally protected from injury or disturbance. It also establishes the legal protection of Areas of Special Scientific Interest, National Nature Reserves (NNRs) and Marine Nature Reserves (MNRs). This list of species was revised in 2004, and the Act itself received some amendment under the Agriculture (Miscellaneous Provisions) Act in 2008.	Text has been amended in Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement to the provided text from the Isle of Man.	No
Mon_069_088_010623	S42	Email	See also comments above on the following, and; Appendix B:WRIGHT, P & SINCLAIR, RR (2022). SEAL HAUL-OUT ANDTELEMETRY DATA IN RELATION TO THE MORGANOFFSHORE WIND PROJECT GENERATION ASSETS.REPORT NUMBER SMRUC-RPS-2022-004. SUBMITTED TO RPS, AUGUST 2022.	Comments addressed and data considered.	No
Mon_069_089_010623	S42	Email	has clearly engaged with IoM data and organisations, but this report appears to have been specifically commissioned by the Mona/Morgan development(s), and appears not to have included the Isle of Man, which is the closest seal colony to the development.	The baseline characterisation in Volume 6, Annex 4.1: Marine mammals of the Environmental Statement includes all data provided by IoM stakeholders and carried forward to the assessment. With respect to the seal telemetry report commissioned to SMRU Consulting, the data is based on seals tagged at key haul outs within the east Irish Sea area and therefore tracks cover individuals transiting to/from haul outs on the IoM.	No





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			be confident that the Manx populations have been adequately and equally included, and the Isle of Man Government seeks confirmation that this has occurred.		
Mon_069_090_010623	S42	Email	Acknowledging the remit of the report (pg. 139) and data sources used, there is relevant data available from MWT-as noted at 1.5.17.1 -1.5.17.2; but there is no specific mention of the Isle of Man in this report, and so it is difficult to understand how the document actually achieves its objectives.	The baseline characterisation in Volume 6, Annex 4.1: Marine mammals of the Environmental Statement includes all data provided by IoM stakeholders and carried forward to the assessment. With respect to the seal telemetry report commissioned to SMRU Consulting, the data is based on seals tagged at key haul outs within the east Irish Sea area and therefore tracks cover individuals transiting to/from haul outs on the IoM.	No
Mon_069_091_010623	S42	Email	1.6.1.7Conservation Designations Noting Table 1.4, and acknowledging that the designation features of each MNR (see: hiips://www.gov.im/media/1378920/designation-of-marine-nature-reserves-guidance-note.pdf), Little Ness MNR is actually an important cetacean area and corresponds to a permanent site for MWDW land-based surveys (see Figure 1.7). It is noted for minke whale, harbour porpoise, bottlenose and Risso's dolphin. All cetacean species are protected in Manx waters. As such, it would be appropriate to include it in Table 1.4, Figure 1.3 and Section 1.6.1.24-32.	Little Ness has been added to Volume 6, Annex 4.1: Marine Mammal Technical Report of the Environmental Statement.	No
Mon_069_092_010623	S42	Email	As relevant to the PEIR, see also comments above in relation to the Technical Report; there are significant areas of overlap. Table 9.10See comment above in relation to Little Ness MNR and inclusion in designated sites. All MNRs contribute to the protection and conservation of marine mammals.	Little Ness has been added to Volume 6, Annex 4.1: Marine Mammal Technical Report of the Environmental Statement	No
Mon_069_093_010623	S42	Email	Agree with tables 9.16and 9.17Scoped Out and Measures adopted.	Response noted.	No
Mon_069_094_010623	S42	Email	Pg. 41. 9.8.2.19Use of seasonal density peaks for grey seal. Clarify that you have include the Manx populations in the secondary baseline report and which are closest populations to the development.	Seasonal density peaks for grey seal have been reviewed for Volume 6, Annex 4.1: Marine mammals of the Environmental Statement after discussion with MWT	No
Mon_069_095_010623	S42	Email	Clarify exclusion of Manx bottlenose dolphins due to temporal regime in Cardigan Bay if the population is the same and they occur in Manx waters in winter?	We have amended the approach for the application and are now using Welsh MM Atlas densities (Evans and Waggitt, 2023) for bottlenose dolphin rather than Cardigan Bay (which had been excluded due to double counting).	No
Mon_069_096_010623	S42	Email	Pg. 43: 9.8.3.18: re. exclusion of Risso's dolphin due to inadequacy of model. Please include additional comment about the expected relative impact on Risso's. It is difficult to understand how the species' relevance can be acknowledged in Manx waters in the baseline and then be excluded due to model limitations without commenting further, or obtaining expert advice on the expected or estimated effect on Risso's in relation to the three species actually included.	There is currently no capacity in the iPCoD for Risso's dolphin, it can only be used to predict the population consequences of disturbance on five key priority species of marine mammal found in the UK (Bottlenose dolphins, Harbour porpoise, Minke whale, Harbour and Grey seals).	No
Mon_069_097_010623	S42	Email	9.8.3.60-64 Noting: 9.8.3.60 For Risso's dolphin, the most conservative estimate of disturbance led to up to 190 animals predicted to experience potential disturbance from concurrent piling of monopiles (Figure 9.5) at a maximum hammer energy of 5,500kJ. This equates 1.54% of the CGNS MU population. However, of these, up to 39 animals are predicted to experience strong disturbance (above 160 dBrms), whist up to 145 animals are likely to experience mild disturbance (between140 and 160 dBrms).	Comment noted. The NMFS thresholds (140 and 160dBrms) are unweighted and applied across all cetaceans. Therefore for a HF cetacean (such as Risso's) the range of effects is considered to be highly conservative as this hearing group is likely to be less sensitive compared to VHF cetaceans (harbour porpoise) or LF cetaceans (minke whale).	No
Mon_069_098_010623	S42	Email	'The area of effect is however small in relation to the extensive distribution of the population for this species (CGNS MU) and there is predicted to be no population consequences of the impact. The magnitude is therefore considered to be low.'	The impacts in related to the relevant species MUs have been assessed since marine mammals are highly wide ranging species. There is no evidence to suggest that animals in IoM waters are part of a separate population to the CGNS MU.	No
Mon_069_099_010623	S42	Email	But the impact on the local Manx population appears to be much more significant, and therefore of primary concern to the Isle of Man Government, which has an interest and responsibility for protecting its local population relative to the species' wider population distribution.	The impacts in related to the relevant species MUs have been assessed since marine mammals are highly wide ranging species. There is no evidence to suggest that animals in IoM waters are part of a separate population to the CGNS MU.	No





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Mon_069_100_010623	S42	Email	9.8.3.111 'Risso's dolphin are mostly common in Manx territorial waters and there is a potential for these species to be present in the vicinity of the Mona marine mammal study area in summer months(for more details seevolume 6, annex 9.1: Marine mammal technical report of the PEIR). Therefore, due to their distribution and seasonality these species are unlikely to be disturbed as a result of piling throughout the year. Additionally, these is no indication that waters within the Mona marine mammal study area are important for foraging or breeding for these species.'	The text in paragraph 4.8.141 in Volume 2, Chapter 4: Marine mammals of the Environmental Statement has been updated to clarify that animals are not likely to be disturbed winter months, more likely in summer. The assessment considers the seasonality of each species in reaching its conclusions.	No
Mon_069_101_010623	S42	Email	It is difficult to follow the logic in this conclusion. Since Risso's dolphin are present in summer months (predominantly around the south of the Isle of Man) then they will be disturbed during that period –so how will this effect be mitigated? There is perhaps no need for winter piling mitigation, but there is for summer piling.	The text in paragraph 4.8.141 in Volume 2, Chapter 4: Marine mammals of the Environmental Statement has been updated to clarify that animals are not likely to be disturbed winter months, more likely in summer. The assessment considers the seasonality of each species in reaching its conclusions.	No
Mon_069_102_010623	S42	Email	In addition, there is evidence that the waters around the south of the Isle of Man is important for foraging and breeding for this species—the closest land fall to the array area, and Figure 9.5 shows a Db level of 135-140dB in known areas of seasonal presence off the south and east coasts of the island.	Volume 2, Chapter 4: Marine mammals of the Environmental Statement has been updated to discuss this seasonal presence around the Island.	No
Mon_069_103_010623	S42	Email	In summary: IoM Government would like to see specific evidence of the consideration of Risso's dolphins, given their proximity to the development and the estimated density of 0.0313 per km2 (Table 9.11) and impact on the reference population (Table 9.24) (vs. minke (which is included) and has a density of only 0.0173 per km2 and lower proportion of population impacted –unless there is no intention or expectation of construction piling in summer months when Risso's occurrence is highest in Manx waters, which seems unlikely.	Comment noted thank you. We have revisited all the impact assessments within Volume 2, Chapter 4: Marine mammals of the Environmental Statement and provided further justification for the conclusions of the assessment where required.	No
Mon_069_104_010623	S42	Email	Pg. 52, 9.8.3.70 –9.8.3.80 linked to above, provide evidence or clarifying that the Manx grey seal population has been appropriately considered, as it is not apparent from this section and, s noted elsewhere, there are apparent omissions of Manx data in the baseline.	The text in Volume 6, Annex 4.2: Marine mammal technical report of the Environmental Statement has been updated to clarify that the Manx grey seal population is included in the baseline and reference population.	No
Mon_069_105_010623	S42	Email	Cetaceans In several places, in relation to multiple species around the Isle of Man, the text appears to present ambiguity of the seasonal data provided by MWDW –'Data obtained from MWDW (2022) also shows higher sightings of Risso's dolphin in summer months, with peaks in June and July however there is no control for survey effort.'	MWDW provided a personal communication and this has been incorporated into Volume 6, Annex 4.2: Marine mammal technical report of the Environmental Statement.	No
Mon_069_106_010623	S42	Email	In the Technical Report similar comments are made about survey effort for several species; Risso's 1.7.5.19 Porpoise 1.7.2.36 Bottlenose dolphin 1.7.3.29 Minke 1.7.6.15	MWDW provided a personal communication and this has been incorporated into Volume 6, Annex 4.2: Marine mammal technical report of the Environmental Statement.	No
Mon_069_107_010623	S42	Email	MWDW has been asked to comment on this and provided the following; The original data request was for sighting locations by species and was provided as shapefiles from pooled sightings from all sources. The associated effort data was not requested, and was not provided.	Thank you for providing this clarification that effort is available.	No
Mon_069_108_010623	S42	Email	The text appears to indicate that they can't confirm that there are no winter sightings because either the species is truly seasonal, or because MWDW has never surveyed in the winter; which is not an unreasonable conclusion. However, this could be confirmed either way by obtaining the effort data and reanalysing. Alternatively, MWDW can provide a 'pers. comm.' to say that we are confident the sightings data reflects a true seasonality for Manx waters.	A 'pers. comm.' has been received to say that we are confident the sightings data reflects a true seasonality for Manx waters to back up statement and this was added to Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement (paragraphs 1.7.2.43, 1.7.3.36, 1.7.5.24, 1.7.6.21)	No
Mon_069_109_010623	S42	Email	MWDW has associated effort data from land and boat surveys, although the public sightings data has no associated effort. A large proportion of the sightings come from public reports (e.g. 1190 Risso's, 983 of which from public so with no associated effort).	Any additional relevant information provided by MWDW has been included in Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement.	No





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Mon_069_110_010623	S42	Email	MWDW has some survey effort from all months, but with least in winter (~3.5%), most in summer (~50-60%), and middling in spring and autumn. So we can say that though we have less effort in the winter, the data we have collected shows seasonality.	Any additional relevant information provided by MWDW has been included in Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement.	No
Mon_069_111_010623	S42	Email	With the public data, although it can't be analysed in terms of effort we do receive sighting reports throughout the year and this again reflects that seasonality.	Any additional relevant information provided by MWDW has been included in Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement.	No
Mon_069_112_010623	S42	Email	A request can be made for effort data, or request for clarifications or pers. comms. to include.	Any additional relevant information provided by MWDW has been included in Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement.	No
Mon_069_113_010623	S42	Email	I would be fairer to change the wording to indicate that 'sightings data was not analysed in the context of effort', so it reflects RPS's choice rather than the data being absent.	Text has been updated in Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement.	No
Mon_069_114_010623	S42	Email	However, IF the conclusion is that; in the absence of seasonal effort data then the assumption for year-round presence is made, and the impact assessments are made on that basis, then the approach is more precautionary, and therefore welcomed.	Text has been updated in Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement.	No
Mon_069_115_010623	S42	Email	1.7.5.19'Howe (2018) suggested Risso's dolphin show high seasonality to Manx waters, with marked spatial and temporal distribution, being present only between March and September and with 90% of sightings on the east coast of the Island. '	Text has been updated in Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement.	No
Mon_069_116_010623	S42	Email	The MMEA report says: "The distribution of Risso's dolphins in Manx waters is also quite marked, with over 90% of all sightings on the east coast, around the Calf of Man or to the south west of the Calf."	Locations of presence of Risso's dolphins has been specified in Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement.	No
Mon_069_117_010623	S42	Email	So the 90% of sightings fall within those three areas, rather than along the east coast in general. Please amend accordingly.	Locations of presence of Risso's dolphins has been specified in Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement.	No
Mon_069_118_010623	S42	Email	Figure 9.8: Gives false impression of grey seal usage around IoM by using a single reference and excluding IoM from the SMRU report appendix. An example of consequence of using a restricted baseline. Please include Manx grey seal accordingly.	Locations of presence of grey seals has been specified in Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement	No
Mon_069_119_010623	S42	Email	Bottlenose Dolphin9.8.3.50 etc. the Cardigan Bay and Manx winter population of bottlenose dolphins on the east coast are believed to be the same group, based on data, including from photographic recognition of individuals. This should be acknowledged, and yet there is no specific assessment of the Manx population in this section.	Data from MWT has been added to the drawings mapping sound contours in order to provide a more accurate illustration of the baseline for the quantitative assessment.	No
Mon_069_120_010623	S42	Email	Pg 86. Table 9.42, Figure 9.12and throughout this section. Recommend inclusion of Ørsted Isle of Man development-pre-application phase: hiips://orsted.co.uk/insights/future-developments/isle-of-man-and Crogga gas development: hiips://www.crogga.im/Does this have an effect on the cumulative impacts assessment?	The CEA has been updated for Volume 2, Chapter 4: Marine mammals of the Environmental Statement with any additional information that has come into the public domain since the PEIR. The Orsted Isle of Man lease area has been screened into Tier 2 of the marine mammal cumulative assessment.	No
Mon_069_121_010623	S42	Email	Table 9.56 –Piling Impact Tier 1: Do comments made above about Manx bottlenose and Risso's dolphins make a difference to these conclusion?	All feedback received via S42 has been considered for the application and discussed of the effects and conclusion have updated where appropriate. The significance of the impact of piling on key species as a result of cumulative projects remain the same for the application as presented in the PEIR (moderate significant effects for bottlenose dolphin and minor significant effects for Risso's dolphin).	No
Mon_069_122_010623	S42	Email	Agree that further mitigation needs discussion, including monitoring, and IoM government requests inclusion in relation to Manx marine mammal interests.	Mitigation and monitoring will be discussed in detail with relevant stakeholders post-consent on the basis the refined project design to be taken forward for construction.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_069_123_010623	S42	Email	Appendix B: SMRU seal haul-out and telemetry data in relation to the Mona Array Area is actually: WRIGHT, P & SINCLAIR, RR (2022). SEAL HAUL-OUT AND TELEMETRY DATA IN RELATION TO THE MORGANOFFSHORE WIND PROJECT GENERATION ASSETS.REPORT NUMBER SMRUC-RPS-2022-004. SUBMITTED TO RPS, AUGUST 2022Same comments apply as noted for TR.	Name of the SMRU telemetry report that was used in the assessment has been amended in Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement.	No
Mon_069_314_010623	S42	Email	Marine Mammals1.6.1.14 It is proposed that potential transboundary impacts to marine mammals and their nature conservation interests are screened into the EIA process. A transboundary assessment has been completed and is included in volume 2, chapter 9: Marine mammals of the PEIR. Potential impacts to European Sites with marine mammals as a qualifying feature will be assessed within the draft HRA.	The Applicant notes your response.	No
Mon_069_315_010623	S42	Email	NOTED, but the Isle of Man Government requests that the potential impacts IS NOT LIMITED to European Sites, as this assumes current or prior EU member status and designation. By definition, transboundary effects cannot assume that designations are the same either side of the boundary, and therefore Isle of Man marine conservation designations, for example Marine Nature Reserves (under the wildlife Act 1990) need to be treated as equivalent, or clearly justified as to why they are not. The Isle of Man is a signatory to various international treaties and conventions, via the UK and, as such, has its own jurisdictional responsibilities. This comment is also relevant to those made in respect of the Marine Mammals chapters.	The IoM Marine Nature Reserves have been considered in Volume 2, Chapter 4: Marine mammals of the Environmental Statement, however, they are not European designated sites and therefore in this context are not considered with the HRA.	No
Mon_069_325_010623	S42	Email	Limiting noise pollution as cetaceans are regularly recorded between Ramsey and Laxey Bays.	Sound has been fully assessed within Volume 2, Chapter 4: Marine mammals of the Environmental Statement and appropriate mitigation will be agreed in consultation with the key stakeholders.	No
Mon_069_326_010623	S42	Email	Limiting disturbance of marine species and coastal sea birds during any boat trips from the Island to the arrays, as and where necessary.	Disturbance will be limited using appropriate designed-in measures, including an Offshore Environmental Management Plan (EMP). There is no potential for disturbance of coastal birds from the Isle of Man as vessel activity associated with construction, operation and maintenance is likely to be undertaken from UK ports.	No
Mon_088_035_040623	S42	Email	Mitigation measures are in place in the draft Marine Mammal Mitigation Protocol (MMMP) and will be subject to statutory oversight. The MMMP is secured by conditions of the Marine License Principles and will be agreed with NRW prior to the commencement of construction.	Noted.	No
Mon_088_036_040623	S42	Email	The WTW notes that the Mona OWF intends to use active deterrent measures to mitigate the collision risk introduced by the OWF infrastructure and increased shipping. Before implementation of these measures baseline assessment of underwater noise must be undertaken to appreciate the impact of the acoustic deterrence on the ambient noise.	The use of ADDs has been recommended as part of the marine mammal mitigation plan (MMMP) to deter animals from potential injury zones that may occur during piling. This measure has not been suggested to reduce collision risk. The risk of collision will, however, be reduced through implementation of an Offshore Environmental Management Plan (EMP) which will include measures such as speed restrictions, not approaching animals, and avoiding abrupt changes in course or speed.	
Mon_123_002_100723	S42	Email	The development could also be positive in providing employment in the green sector. We also appreciate the need for wide consultation, to minimize the impact of the development on the marine/ terrestrial environments and on local communities.	The Applicant notes your response and recommends reviewing the Socio-Economics chapter (Document reference F4.3) for information on employment, and the Chapters within Volume 2, 3 and 4 of the Environmental Statement for information on the applicant's proposals to minimise and mitigate against any potential effects on the marine and terrestrial environments.	No
Mon_156_005_010623	S47	Feedback form	The whole project MUST be abandoned because it is damaging to the Manx people, industries, and economy, plus ecology and marine life.	Impacts to marine ecology receptors and human receptors (e.g. shipping and navigation, commercial fisheries and socio-economics including the interaction with lifeline ferry services) have been fully assessed for all phases of the project, based on a maximum design scenario approach. Designated sites within the Isle of Man territorial waters, and their associated habitats and species, have been considered and documented in the assessment	





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Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				process. Seascape and visual impacts and impacts on designated heritage assets from the offshore infrastructure have also been considered. The assessment has engaged with stakeholders from the Isle of Man to ensure all relevant and available data has been included and is therefore based upon the best evidence to underpin the assessment of impacts. Most assessments have determined that there will be no significant effect from the Mona Offshore Wind Project. Where a significant effect has been identified, the Applicant has set out appropriate mitigation within the application. Detailed mitigation will be determined post-consent once the project parameters are fully refined and understood. Key stakeholders, including those on the Isle of Man, will be consulted to ensure the mitigation approach is suitable.	
Mon_158_015_020623	S44	Feedback form	My goodness, so many reports of whales being washed up and dying or fatally injured. Something is causing this to happen. I am sure that the wind industry will provide an argument that it is not causal in this terrible situation. As a lay person, it seems perfectly plausible that such huge marine infrastructure and disturbance is having deleterious effects on these large marine mammals. If the wind industry is causing damage to the sonar abilities of these mammals, or any other harmful effects then it needs to be addressed immediately.	Impacts to marine mammals, including injury or disturbance from a range of different sound sources associated with the proposed development, have been fully assessed for all phases of the Mona Offshore Wind Project based on a scenario that considers the maximum parameters. The assessment has engaged with stakeholders to ensure we have included all relevant and available data and is therefore based upon the best evidence to underpin the assessment of impacts. For the application, where there are any conclusions of a significant impact on marine mammals, either alone or in combination with other plans or projects, it will be the responsibility of the Applicant to ensure measures can be taken to mitigate such impacts. Detailed mitigation to ensure that there is no residual risk of injury to marine mammals will be determined post-consent once the Mona Offshore Wind Project parameters are fully refined and understood. Key stakeholders will be consulted to ensure the mitigation approach is suitable.	



D.25.11 Offshore ornithology table of responses



Table D.25. 11: Offshore ornithology table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_012_001_260423	S47	Email	I was very concerned to read how dismissive the PEIR is of the marine ecology in this location. The repeated use of phrases like 'negligible or minor adverse significance' does not take into account the interconnectedness and complexity of this marine biome. Its damage and destruction throughout the construction, operation and decommissioning phase could irrevocably damage the local ecosystem and disrupt feeding patterns of species below and above the surface of the sea. One such example of this interconnectedness and only briefly mentioned in the PEIR is the last breeding colony of little terns in Wales who nest every year at Gronant. Among other tern species in this vicinity, they rely on sand eels as an important part of their diet to feed their chicks. As with other terns in this area they do feed close to shore, but they also fly further out to sea to dive for sand eels. Their numbers have declined by 50% since the 1980s and now the last remaining colony is managed by Denbighshire Countryside Service. PEIR (Non-Technical Summary 1.7.3.2) states that sand eels have 'important populations and spawning grounds in this area', and yet the report (Vol 2: Ch10) assessed the impact this might have on the little tern colony and its vital food source as not significant. If this development were to proceed, mitigation measures (such as pre-commencement breeding bird surveys) could never reverse the inevitable damage caused to this important food resource and to an already depleted colony. According to the PEIR (Non-technical summary), "most of these impacts result in either negligible, or minor adverse effects, which are not significant in EIA terms" (PEIR, 1.8.9.4).	The applicant thanks the consultee for its detailed comments on the marine ecology of the project and recognises the importance of the queries raised. Technical reports within Volume 6 of the Environmental Statement provide details of the site-specific marine ecology surveys with their results. Detailed assessments have been undertaken throughout the project lifetime in line with EIA regulations and chapters within Volume 2 of the Environmental Statement provide details of the assessment undertaken and the applicants approach to managing and mitigating any potential impacts the project may have on the marine environment.	
Mon_054_007_010623	S42/S44	Email	Marine Ornithology: NRW (A) can not agree with multiple assessment conclusions in the PEIR, due to either the methodologies used or lack of justification for the approaches taken. We provide advice on the significant further work necessary.	The Applicant notes your response.	No
Mon_054_278_010623	S42/S44	Email	Offshore Ornithology1.6.1Key Issues NRW (A) notes that the PEIR has not taken account of advice provided during the Offshore Ornithology Expert Working Group (EWG) meetings 3 and 4 held in November 2022 and February 2023 respectively. As a result, our advice provided during these meetings on various matters has been repeated in the current document.	Noted. In the Environmental Statement all EWG meeting outcomes, relevant additional information provided after the EWGs and all S42 responses have been considered.	No
Mon_054_279_010623	S42/S44	Email	The key issues regarding the PEIR documents for Offshore Ornithology are: Concerns regarding the numbers of guillemot/razorbill recorded, the potential issues related to this and apportionment of these birds to species and how these have been applied in model-based abundance estimates.	Noted. In the Environmental Statement, ID rates for auk species have been updated and therefore all modelling has been rerun for this species and is presented in Volume 2, Chapter 5: Offshore Ornithology.	No
Mon_054_280_010623	S42/S44	Email	Availability bias correction factors that have been used and how these have been applied in model-based abundance estimates.	Noted. In the Environmental Statement, more clarity has been given on the apportioning and availability bias factors applied to relevant species.	No
Mon_054_281_010623	S42/S44	Email	How model-based abundance estimates of birds in flight only have been generated for use in collision risk modelling (CRM).	Noted. In the Environmental Statement additional text has been provided to state how birds in flight have been calculated from model-based estimates utilising the site specific data	No
Mon_054_282_010623	S42/S44	Email	The need to provide the bootstrapped abundance data used for the CRM and the log files generated by the sCRM.	Density estimates of species screened into collision risk assessment are presented in Volume 6, Annex 5.3: Offshore ornithology collision risk modelling technical report. All bootstrapped abundance are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report. Log files have been generated and saved and are available on request in a digital format.	No
Mon_054_283_010623	S42/S44	Email	The need for consideration of migrant seabird species (for example skuas, terns) in collision risk assessments.	Migratory seabirds have been considered in the collision risk modelling for seabirds provided in Volume 6, Annex 5.4: Offshore ornithology migratory bird collision risk modelling technical report of the Environmental Statement.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_054_284_010623	S42/S44	Email	Projects and data included in cumulative (and hence in-combination) assessments.	Noted. Further clarity and consideration has been given to the projects included in the CEA and in-combination assessments	No
Mon_054_285_010623	S42/S44	Email	The approach to apportionment of impacts, including: NRW (A) does not agree with the use of stable age structures for age-class apportioning or the removal of sabbaticals from impacts.	Where possible, site-specific age-classes from Digital Aerial Surveys (DAS) were used for age-class apportioning within the breeding season as advised by the Expert Working Group. If site-specific age class could not be generated during the breeding season, then all birds were assumed to be adult birds per EWG request. Sabbatical birds have not been removed nor have they been estimated to remove confusion. The methodology is presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement.	No
Mon_054_286_010623	S42/S44	Email	NRW (A) does not agree with updating the colony figures from those in Furness (2015) in apportioning impacts to designated sites outside the breeding season, and the approach used does not follow the advice provided previously during the EWG.	To apportion non-breeding season effects from the Mona Offshore Wind Project between relevant SPAs, the contribution of adult and immature birds from an individual SPA as a proportion of the BDMPS defined in Furness (2015) was utilised. Furness 2015 counts have not been updated and have been lifted directly from the tables presented in the report. The methodology has been presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement.	No
Mon_054_287_010623	S42/S44	Email	Lack of assessment of Sites of Special Scientific Interest (SSSIs)and features where there is potential for connectivity.	SSI sites/colonies within individual species foraging range (mean-max foraging range + SD) from the Mona Array Area and the Mona Offshore Cable Corridor and Access Areas have been presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement and taken forward to the impact assessment. These have additionally received apportion figures to further state how these non-SPA sites have been accounted for and considered in the assessment.	No
Mon_054_288_010623	S42/S44	Email	Approach to LSE screening and hence sites taken through to HRA Stage 2 assessment. Further information on each of these issues is set out in the detailed comments below.	Noted, detailed response has been provided against the detailed comments.	No
Mon_054_289_010623	S42/S44	Email	Detailed Comments1.6.2.1 Baseline Characterisation –Volume 2, Chapter 10 Offshore Ornithology, Section 10.4 Baseline Environment and Volume 6,Annex 10.1Offshore Ornithology Baseline Characterisation, Annex 10.2 Offshore Ornithology Displacement Assessment and 10.3 Offshore Ornithology non-migratory seabird collision risk assessment Mona Array Area and Buffers With reference to the Apportionment of unidentified birds, NRW (A) note in Table 10.8 Species/groups and sum of raw counts recorded during the March 2020 to February 2022 surveys, in order of total abundance, that the second most frequently recorded species/species group during the 24 months of digital aerial surveys of the Mona Array area and buffers was guillemot/razorbill, with a total of 6,247 raw counts. Whilst NRW(A)welcome that unidentified species have been apportioned to individual species that make up the respective groups via the approach set out in Paragraphs 1.2.3.18–1. 2.3.22 of Annex 10.1, we have concerns regarding the high proportions of records identified as guillemot/razorbill and the implications this may have for the appropriateness of modelling abundances for these species and of apportioning these records to the individual species based on proportions of identified guillemots and razorbills.	digital aerial image analysis process, 50% of targets identified within the imagery passed through quality assurance (QA) checks, where the bird image was checked by another team member and re-identified if needed. The	





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				confident in that ID, if there was any uncertainty APEM used a higher classification level.	
Mon_054_290_010623	S42/S44	Email	Although apportioning of unidentified groups to species provides the best available approach to estimating numbers of each species, this method may introduce biases, for example if one species in a group is easier to identify to species than others in the same general group, then the apportioning may overestimate numbers of the easily identified species and correspondingly underestimate numbers of the less easily identified species. This needs to be considered when assessing densities of species for which a significant proportion of birds had to be assigned to an unidentified group. As a result, apportioning such a large proportion of unidentified auks based on the proportions of identified species may not be appropriate and NRW (A) are unsure whether spatial modelling of a species with such a low identification rate is likely to be representative.	Auk ID rates were revised upward following a revised QA of images. As the result, the apportioning in the ES chapter is based on a smaller proportion of unidentified Auk species than presented in the PEIR. Therefore, the apportioning method is considered appropriate. The full method to apportioning of unknowns to knowns is provided within Volume 6, Annex 5.1 Baseline Characterisation technical report. This details the level of unknowns and where they were apportioned to.	No
Mon_054_291_010623	S42/S44	Email	NRW(A)advise that a breakdown of monthly records of positively identified guillemot and razorbill alongside the number of records per month of guillemot/razorbill (and any other relevant species groups) is provided. Consideration should also be given to issues with bias regarding apportioning to species of guillemot/razorbill records given the very high number of records of this group.	Volume 6, Annex 5.1 provides a breakdown of all unknown groups and the number of birds recorded. The report additionally states which birds are apportioned to which category aiding with clarity on how unknown birds were dealt with. Additionally, unidentified gulls, skuas, petrels, terns, thrushes and wader species were apportioned to identified species (Table 1.8).	No
Mon_054_292_010623	S42/S44	Email	As detailed in Paragraphs258 and 259below, it is unclear how apportionment of unidentified birds has been applied to the abundance estimates generated from MRSea modelling.	The apportioning of unidentified species was applied to design and model based estimates of known species.	No
Mon_054_293_010623	S42/S44	Email	With reference to Availability Bias, NRW (A) welcome that correction factors have been applied to data for birds on the water for guillemot, razorbill and puffin to account for birds not visible during survey as diving underwater, based on that recommended by JNCC (2013) in submissions during the examination phase of the East Anglia One Offshore Wind Farm Project. However, there is some inconsistency in the correction factors applied between the information presented in the baseline characterisation annex (Annex 10.1) and the displacement annex (Annex 10.2)as follows:•Paragraph 1.2.3.26statesthat, "The correction factors applied to sitting common guillemot, razorbill, and puffin were based on JNCC (2013), which assumed that 24.3% of common guillemot, 17.4% of razorbill, and 14.2% of puffin are underwater when digital aerial imagery is captured, leading to correction factors of 1.311, 1.211, and 1.165 respectively. "•Annex 10.2, Appendix A, Tables A.122–A.124, suggest the following correction factors were used for availability bias: 0.2405 for guillemot, 0.1818 for razorbill, 0.1416 for puffin. Clarification is therefore required as to the correction factors that have actually been used. Additionally, as detailed in Paragraphs258 and 259ofthe current document, it is unclear how availability bias correction has been applied to the abundance estimates generated from MRSea modelling.	offshore ornithology assessment.	No
Mon_054_294_010623	S42/S44	Email	With reference to Abundance Estimates, MRSea abundance estimates for all birds (flying and sitting on the water) have been generated for 5 species (guillemot, Manx shearwater, kittiwake, razorbill, gannet) for survey months where more than 50 birds were recorded. Whilst the MRSea approach as set out in Paragraphs 1.2.3.11–14 of Annex 10.1looks broadly appropriate, clarification is required on the following: How densities of flying birds only have been generated from MRSea for use in CRM, including how the mean monthly in-flight densities and confidence intervals have been generated. For example, has this been done by apportioning the MRSea estimates for all birds to birds in flight and on the water based on the ratios recorded of birds on the water and birds inflight? How corrections for unidentified birds and for availability bias have been applied to the MRSea estimates and confidence intervals. For example, have guillemot/razorbill records been modelled using MRSea and then the resulting abundances of guillemot/razorbill apportioned to the individual species based on ratios –noting that it would not be possible to apportion the distributions of the unidentified birds to species and this approach assumes no spatial bias in guillemot and razorbill.	Further clarity has been provided within Volume 6, Annex 5.1 detailing the steps taken when producing design-based and MRSea estimates, incorporating both unknown birds and availability bias. To summaries, spatial modelling was done on the known birds, with MRSea maps showing the unportioned and not corrected for availability bias distribution. Number estimates were then subject to apportioning of unknown birds, with the proportion of birds sitting estimated by taking the raw survey count data and multiplying it by the proportion of sitting birds observed during DAS for each month. This sitting count was then subject to availability bias correction if applicable.	No
Mon_054_295_010623	S42/S44	Email	NRW (A) recommend that a worked example of the approach for a species assessed by MRSea for collision (for example kittiwake) and for a species assessed for displacement (for example guillemot) be included, that details how unidentified birds and availability bias have been corrected for and how estimates of birds in flight have been made from the all birds estimates.	Methodology has been further clarified in response to S42 consultation and therefore the requirement for a worked example is no longer necessary.	No





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Mon_054_296_010623	S42/S44	Email	NRW(A)welcome that the design-based abundance estimates for birds in flight, on the water and combined for the site and site plus various buffers, have been presented in Annex 10.1. However, no coefficient of variation (CVs) for any estimates have been presented anywhere in the PEIR documents, despite Table 10.5Summary of key topics and issue raised during consultation activities undertaken for the Mona Offshore Wind Project relevant to offshore ornithology, stating that: 'CVs are also provided in volume 6, annex 10.1: Offshore ornithology baseline characterisation of the PEIR to give a measure of precision to support the approach.' NRW(A) request that the CVs are provided.		No
Mon_054_297_010623	S42/S44	Email	Offshore Cable Corridor Area With regard to the desktop studies associated with the Liverpool Bay Special Protection Area (SPA)summarised in Section 1.4Baseline characterisation of the Mona Offshore Ornithology Offshore Cable Corridor Study Area, of Annex 10.1, NRW (A) suggest that a watching brief is kept for publication of the results of digital aerial surveys of the original Liverpool Bay SPA boundary that have taken place over several successive winters (2015, 2018, 2019 and2020), as these should provide more recent information on the distribution of red-throated diver and common scoter within the SPA and hence the section of the Mona offshore cable corridor area that passes through the SPA, than is currently considered. This should also be considered regarding red-throated diver and common scoter densities in the offshore export cable area that overlaps the Liverpool Bay SPA in the HRA assessments.	Key findings from HiDef Aerial Surveying Limited (2023) Densities of qualifying species within Liverpool Bay/ Bae Lerpwl SPA: 2015 to 2020. Natural England Commissioned Report 440, Natural England have been summarised in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement. Densities for red-throated diver and common scoter are based on this report in place of Lawson 2016/Bradbury 2014 densities due to the age of that underlaying data (2001-2011). As NRW have stated, the HiDef report gives a more up to date representation of densities within the area now and also population count and hence have now been used. No raw data was provided and so Bradbury maps have still been shown for the cable route for historical context.	No
Mon_054_298_010623	S42/S44	Email	Designated Sites In addition to SPAs, the list of designated sites in Table 10.9 Designated sites and relevant qualifying interests for the offshore ornithology assessment, should include relevant Ramsar sites (for example the Dee Estuary is also designated as a Ramsar site and non-breeding waterbirds are features) and SSSIs (for example the Pen y Gogarth / Great Ormes Head SSSI, which is designated for breeding kittiwake, guillemot and razorbill, and the Mona site is located within mean-maximum foraging range of these species from this SSSI). Additionally, Figure 1.2 Boundaries for protected sites designated for seabirds and coastal birds within 100km of the Mona Array Area, in Annex 10.1,does not include any Welsh SSSIs with seabird features, for example Pen y Gogarth / Great Orme's Head SSSI, Creigiau Rhiwledyn / Little Orme's Head SSSI, Traeth Lafan SSSI, Cemlyn Bay SSSI, The Skerries SSSI, Ynys Feurig SSSI.	SSSI & RAMSAR sites/colonies within individual species foraging range (mean-max foraging range + SD) from the Mona Array Area and the Mona Offshore Cable Corridor and Access Area are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement. These Welsh colonies/sites have therefore now been considered in more detail	No
Mon_054_299_010623	S42/S44	Email	In addition to the Welsh SPAs already listed in Table 10.9 Designated sites and relevant qualifying interests for the offshore ornithology assessment, NRW (A) note that the Glannau Aberdaron ac Ynys Enlli / Aberdaron Coast and Bardsey Island SPA designated for breeding Manx shearwater is also located within foraging range of this species from the Mona site and should be included.	SPA sites/colonies within individual species foraging range (mean-max foraging range + SD) from the Mona Array Area and the Mona Offshore Cable Corridor and Access Areas, including the Glannau Aberdaron ac Ynys Enlli / Aberdaron Coast and Bardsey Island SPA have been presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement. All seabird features have been considered in the Environmental Statement chapter.	No
Mon_054_300_010623	S42/S44	Email	Furthermore, in Table 10.9 Designated sites and relevant qualifying interests for the offshore ornithology assessment, it should be noted that for the Sgomer, Sgogwm a Moroedd Penfro / Skomer, Skokholm and seas off Pembrokeshire SPA, puffin is a qualifying feature in its own right along with Manx shearwater, European storm petrel, lesser black-backed gull and a breeding seabird assemblage (including razorbill, guillemot, kittiwake, puffin, lesser black-backed gull, Manx shearwater, storm petrel).	SPA sites/colonies within individual species (mean-max foraging range + SD) from the Mona Array Area and the Mona Offshore Cable Corridor and Access Areas are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement. This includes the Skomer, Skokholm and the Seas off Pembrokeshire SPA and seabird qualifying species. All seabird features have been considered in the ES chapter.	No
Mon_054_301_010623	S42/S44	Email	Whilst SPAs/Ramsars are assessed within the HRA related reports, where there is potential connectivity (for example, within foraging range etc.) and potential impact pathway of seabird features of SSSIs that	Predicted mortalities from collisions and displacement of the Mona Offshore Wind Project to seabird colonies designated	No



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			are not already assessed in the HRA reports as they are also features of SPAs/Ramsars, these SSSIs and features need to be assessed within the Environmental Statement(ES). For example, the Pen y Gogarth / Great Orme's Head SSSI is designated for breeding kittiwake, guillemot and razorbill and the Mona project is located within foraging range of all three of these species. Hence quantitative assessments of displacement for guillemot and razorbill and collision for kittiwake should be undertaken for this site.	SSSI have been presented in Volume 6, Annex 5.5:	
Mon_054_302_010623	S42/S44	Email	Reference Populations With reference to Breeding Season, NRW (A) are uncertain of the appropriateness of the approach that has been taken to calculate the regional breeding season reference populations and we have been unable to replicate the numbers presented in Table 10.12Calculation of regional population during the breeding season, (particularly those for the proportions of immatures and juveniles quoted as within information presented in Furness (2015)). NRW (A) suggest that approaches to calculating regional breeding reference populations be explored collaboratively through the Offshore Ornithology EWG.	There were potential inaccuracies associated with the approach proposed by NRW at the EWG with broad assumptions about immature populations which result in an increase in the total regional breeding population figure. As a more precautionary approach in the ES chapter, the number of immature birds present in the regional BDMPS has been estimated using the ratio of immatures per breeding adult provided in the relevant species accounts in Furness (2015). The Applicant acknowledges there are also potential inaccuracies with this approach. This approach likely under-estimates the true count of juvenile and immature birds due to failing to account for juvenile and immature birds migrating across to UK colonies in the breeding season from wintering grounds outside of the UK. However as stated, will result in a more precautionary assessment in-line with Natural England guidance due to making use of a much smaller total regional breeding population against which the impacts have been assessed.	No
Mon_054_303_010623	S42/S44	Email	With reference to Non-breeding season(s)NRW (A) agree with the use of the non-breeding season(s) Biological Defined Minimum Population Scales (BDMPS)sizes from Furness (2015) presented in Table 10.13 Bio-season population sizes used within the assessment, Table 1.3 Bio-season population sizes used within the assessment of Annex 10.2, and Table 1.4 Seasonal definitions, from Furness (2015) of Annex 10.3.	The Applicant notes your response.	No
Mon_054_304_010623	S42/S44	Email	Assessment of Significant Effects/Impacts at EIA scale—Volume 2, Chapter 10 Offshore Ornithology, Section10.8Assessment of significant effects and Volume 6, Annex 10.2 Offshore Ornithology Displacement Assessment, Annex 10.3 Offshore Ornithology non-migratory seabird collision risk assessment, and Annex 10.4 Offshore ornithology migratory non-seabird collision risk modelling Disturbance and Displacement NRW(A)welcome the proposal in Paragraph 10.8.1.4 of an Environmental Management Plan (EMP) that includes measures to minimise disturbance to rafting birds from transiting vessels and that this should be secured through a condition in the marine licence(s).	The Applicant notes your response.	No
Mon_054_305_010623	S42/S44	Email	Please note our comments in Paragraphs253 and 254above regarding the numbers and apportionment of unidentified birds (particularly the high number of records of guillemot/razorbill), clarification on availability bias correction factors used, how corrections for unidentified birds and availability bias have been applied for MRSea estimates and confidence intervals. Please also note our comments in Paragraph 266of the current document, regarding the seasonal regional breeding populations used.	The apportionment of unidentified species was applied to design and model-based estimates (i.e. MRSea) of known species. The methodology is presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement. The methodology detailing how correction factors were applied to abundance estimates is presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement.	No





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Mon_054_306_010623	S42/S44	Email	NRW (A) welcome that quantitative assessments of displacement have been undertaken for all phases for guillemot, razorbill, puffin, gannet and Manx shearwater for EIA scale within Section 10.8.1Disturbance and displacement from airborne noise, underwater sound and presence of vessels and infrastructure, and in Annex 10.2. We also note that assessment has been made of kittiwake displacement. However, NRW(A)do not recommend that displacement is assessed for kittiwake as we currently consider the evidence base to be insufficient hence we have not provided advice/comment on this.	Although black-legged kittiwake are considered to have low sensitivity to displacement, this species has been considered following an agreement through the Evidence Plan Process.	No
Mon_054_307_010623	S42/S44	Email	The table headings in Annex 10.2Appendix A Bird data for displacement assessment (Tables A.122–A.128) suggest that the mean seasonal peak abundance estimates used in the matrices for displacement assessments are based on the modelled (i.e. MRSea) abundance estimates. Clarification is required as to whether this is the case, as we note, for example, in Annex 10.1, Appendix BMRSEA Estimates for Each Boundary Area, Table B3 Razorbill, that there are no model-based (MRSea) abundances for Apr-Aug and Oct-Jan for year 1, and for May-Nov for year 2 for the Mona site plus 2km buffer, but there are abundances given for these months in Annex 10.2, Table A.123, which suggests that the design-based estimates for these months have been included. Clarification is therefore required as to whether the monthly abundance estimates presented in Tables A.122-A.128of Annex 10.2 are actually a mix of design-based and model-based (MRSea) estimates or whether all are model-based (MRSea) or all design-based.	Monthly species abundances are a mix of MRSea and design-based abundances, with MRSea estimates used in instead of design-based estimates wherever possible. Further explanations are provided in Volume 6, Annex 5.2: Offshore ornithology displacement technical report of the Environmental Statement and in Volume 6, Annex 5.3: Offshore ornithology collision risk modelling technical report of the Environmental Statement.	No
Mon_054_308_010623	S42/S44	Email	Based on the above, it appears that for the species where MRSea estimates have been generated for some of the surveys, the quantitative impact assessments (for example of displacement and collision risk) have been based on a mix of MRSea estimates for months where these are available and design-based estimates where MRSea estimates are not available. Whilst this approach seems sensible and uses the best available data, this hierarchy of approach needs to be clearly stated in the documents.	Monthly species abundances are a mix of MRSea and design-based abundances, with MRSea estimates used instead of design-based estimates wherever possible. Further explanations are provided in Volume 6, Annex 5.2: Offshore ornithology displacement technical report of the Environmental Statement and in Volume 6, Annex 5.3: Offshore ornithology collision risk modelling technical report of the Environmental Statement.	No
Mon_054_309_010623	S42/S44	Email	NRW (A) agree with the displacement and mortality rates used for the operational phase for auks (guillemot, razorbill and puffin) and gannet and also welcome that displacement during the construction and decommissioning phases has been considered to by 50% of the operational phase. However, as discussed during Offshore Ornithology EWG3, as there is currently no evidence for any particular range of displacement rates (1-10%, 30-70% or any other) for Manx shearwater from offshore wind farms, NRW (A) welcome that the whole matrices for all phases are presented in Tables 1.103-1.111and 1.113-1.121 of Annex 10.2. Manx shearwaters have been shown to avoid the windfarm at North Hoyle in Liverpool Bay (see Table 3 of Dierschke et al., 2016). Whilst the predicted impacts across the whole matrices presented in the PEIR can be used to further inform discussions on the appropriate range of displacement rates to use in the final submission for Manx shearwater (as was agreed during EWG3), NRW do note that based on the figures presented, even if the absolute worst case scenarios of 50% displacement for construction/decommissioning and 100% displacement for operation together with 10% mortality are considered, the predicted impacts equate to well below 1% of baseline mortality of the largest BDMPS and would not be detectable against background mortality.	Noted. The whole matrix has been presented for Manx shearwater in line with other auk species in the offshore ornithology assessment.	No
Mon_054_310_010623	S42/S44	Email	2.2Collision Risk NRW (A) welcome that assessment of collision risk has been made for the key sensitive seabird species and also for non-seabird migrant species that may have been missed by digital aerial surveys within Section 10.8.4Collision risk, and in Annexes 10.3 and 10.4. However, seabird species that may pass through the Mona site on migration (for example skuas, terns etc.) should not be excluded from assessments based on low numbers recorded during site-based surveys alone. It would not be appropriate to use the Strategic Ornithological Support Services Migration Assessment Tool (SOSSMAT)for these species as they often migrate following coastlines at a distance offshore, rather than straight lines between point of origin and destination, which is an assumption of SOSSMAT/Migropath. Therefore, alternative approaches are required, such as estimating the abundance of a species of bird migrating through a wind farm footprint area based on an apportionment of migrant bird numbers across a broad migratory front. For example, for a species that might pass through the Irish Sea as part of a longer migratory route (such as great skua), the risks that the population is exposed to, relates to the proportion of the broad migratory front that passes across the proposed wind farm area. For a species that migrates exclusively over the sea, the broad migratory front could be defined as the width of the Irish Sea. Consideration should also be	modelling technical report of the Environmental Statement	





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			given to the distribution of birds within the broad migratory front: birds could be distributed evenly, or they might have a skewed distribution; for example, if the species tends to avoid the coast on migration through the Irish Sea, then distribution could be biased towards the centre of the Irish Sea. This approach is broadly consistent with the approach taken in the report for the Marine Scotland project on strategic assessment of collision risk of OWFs to migrating birds (WWT Consulting Ltd 2014) hiip://www.gov.scot/Resource/0046/00461026.pdf		
Mon_054_311_010623	S42/S44	Email	With reference to seabird collision risk, NRW (A) welcome that the collision risk modelling has been undertaken using the Stochastic Collision Risk Model (sCRM) developed by Marine Scotland (McGregor et al.,2018) and given the lack of robust site-specific flight height data, agree that the impact assessments have been based on Option 2 outputs.	The Applicant notes your response.	No
Mon_054_312_010623	S42/S44	Email	NRW (A) are content with use of the input parameters (biometrics, avoidance rates, nocturnal activity factors) used as presented in Annex 10.3, Table 1.1 Species biometrics and input parameters for CRM, which are consistent with those supplied by NE in their draft guidance (which was submitted in NE's relevant representations for the Dudgeon and Sheringham Shoal extension projects examination –see Appendix B2 of:EN010109-000540-Natural England-Relevant Representation.pdf (planninginspectorate.gov.uk). The review of avoidance rates by Ozsanlav-Harris et al.,(2022) that informed the draft guidance on avoidance rates is now published and available from JNCC's website at: Review of data used to calculate avoidance rates for collision risk modelling of seabirds JNCC Resource Hub. NRW (A) also agree with the use of a 70% reduction in gannet densities going into the CRM to account for macro avoidance.	Noted. NE avoidance rates and JNCC Ozsanlav-Harris have both been used in the offshore ornithology assessment as NE presented large gull rates for Great black-backed gull while Ozsanlav-Harris presented species specific rates which were deemed appropriate for use.	No
Mon_054_313_010623	S42/S44	Email	NRW (A) understand that the seabird density data used in the sCRM are 1,000 bootstrapped values generated for each month using either MRSea or design-based outputs. Please note our comments in Paragraph 258of the current document regarding how densities of flying birds only have been generated from MRSea for use in CRM; NRW (A) also request that the bootstrapped data be provided to enable the modelling to be re-run and the outputs checked.	Densities of birds in flight were generated by multiplying the densities of all behaviours within the Mona Array Area (generated from MRSea or design-based) by the proportion of birds in flight. The proportion of birds in flight of each species was calculated for each month separately, across the entire survey area using the raw data. The proportion was calculated across the entire digital aerial survey area rather than just the Mona Array Area to ensure the sample size was sufficient to generate a robust estimate of the proportion of birds in flight. Further explanation is given in Volume 6, Annex 5.3: Offshore ornithology collision risk modelling technical report of the Environmental Statement.	No
Mon_054_314_010623	S42/S44	Email	Whilst the input parameters (bird parameters and turbine parameters) are provided in Table 1.1Species biometrics and input parameters for CRM and Table 1.2 Wind turbine parameters in the MCS for CRM, of Annex 10.3, NRW (A) recommend that the log files produced by the sCRM tool be provided as an appendix.	Density estimates of species screened into collision risk assessment are presented in Volume 6, Annex 5.3: Offshore ornithology collision risk modelling technical report. All bootstrapped abundance are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report. Log files are available on request in a digital format.	No
Mon_054_315_010623	S42/S44	Email	With reference to Migratory non-seabird collision risk, NRW (A) welcomes that the collision risk assessment for migratory non-seabirds has been undertaken using the SOSSMAT tool to estimate the number of birds passing through the Mona site on migration and that these estimates have been fed into collision risk modelling using the Band (2012) single transit model in Annex 10.4. NRW (A) welcomes that a range of avoidance rates have been considered. From Annex 10.4, Table 1.4 Species and population parameters used in the Band (2012) single transit collision risk model, the proportions at collision height (%PCH) for each species used in the CRM are the central %PCH values for the relevant species groups from Table 3 of Wright et al., (2012), consideration should also be given to the ranges of %PCHs in Wright et al., (2012) to account for uncertainty. NRW (A) also advise that an example species Band (2012) input and output sheet are included.	An example species of the Band (2012) input and output is presented in Volume 6, Annex 5.4: Offshore ornithology migratory birds collision risk modelling technical report of the Environmental Statement.	No
Mon_054_316_010623	S42/S44	Email	Cumulative EIA Scale Impacts, Volume 2, Chapter 10 Offshore Ornithology, Section 10.10 Cumulative effects assessment NRW (A) do not consider it appropriate to base the cumulative (and hence also in-combination) assessments on so many unknowns for impacts from many of the relevant other projects. Whilst these	Projects where effects were not historically assessed were included in the CEA presented in Volume 2, Chapter 5: Offshore Ornithology and the in-combination assessment in the ISAA and treated as unavailable. A more detailed	No





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			historic projects may not have undertaken quantitative assessments, or assessments using current approaches, estimates will need to be generated for these unknown projects in order to undertake meaningful assessments. NRW(A)suggest this should be explored collaboratively through the offshore ornithology EWG. These discussions could also cover potential issues over different avoidance rates, collision model options etc. used by other projects where there are data available.	qualitative assessment has been added to further assess the historic offshore wind projects. This has been discussed with the EWG and the Applicant has provided a detailed response via a technical note.	
Mon_054_317_010623	S42/S44	Email	Furthermore, regarding data included for other projects within the cumulative assessments (applies for both displacement and collision and construction and operation phases), NRW(A)note the following:	The Applicant notes your response.	No
Mon_054_318_010623	S42/S44	Email	The figures included for Erebus for both displacement and collision risk are not the final agreed figures. They appear to be from the ES submission, which are not correct as these did not apportion unidentified birds to species and the collision figures were based on use of site-specific flight height data collected by a method that has not been adequately validated or agreed by the Statutory Nature Conservation Bodies (SNCBs). NRW (A) consider the appropriate figures to include for Erebus are in Table 1 and Table 2 below.	Erebus collision figures recommended by Statutory Nature Conservation Bodies (SNCBs) are included the CEA presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_054_319_010623	S42/S44	Email	NRW(A)understand that figures included for Morgan and Morecambe Generation Assets are those from the PEIRs for these projects, which are based on only 12 months of baseline data and will therefore need updating when the full 24 months of data are available.	The cumulative assessment considers information in the public domain at the point of application. Under the current program for each DCO the publicly available information at the point of submission are the Morgan Generation PEIR and the Morecambe Generation PEIR.	No
Mon_054_320_010623	S42/S44	Email	Please note that data for Llŷr 1 &2 may be available ahead of the application submission for Project Mona.	The cumulative assessment in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement considers information in the public domain at the point of application.	No
Mon_054_321_010623	S42/S44	Email	The cumulative assessment tables are missing the Hexicon TwinHub site off North Cornwall and the Morlais Tidal Demonstration Zone (which should have the ERM/CRM predictions included in assessments)—data for these were include in the updated assessments in the Erebus SEI document —see Table 1 below).	All projects that have been considered in the cumulative assessment presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement. These have been considered with impacts included if applicable.	No
Mon_054_322_010623	S42/S44	Email	NRW (A) advise that the guillemot seasonal abundances included for Mona in Table 10.73are double-checked, as they are not consistent with the seasonal abundances presented in Annex 10.2, Table 1.15 Common guillemot bio-season displacement estimates for the Mona Array Area plus 2km buffer during the operations and maintenance phase.	Common guillemot seasonal abundances have been checked in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement and in Volume 6, Annex 5.2: Offshore ornithology displacement technical report of the Environmental Statement.	No
Mon_054_323_010623	S42/S44	Email	NRW (A)advise that Table10.77is double checked as (based on the figures presented in the RIAA Appendix H, Annex H.4 of The Crown Estate's Round 4 Plan Level HRA documents), the figures presented in Table 10.77for North Hoyle look like they should be for Burbo Bank Extension, those for Walney 1&2 look like they should be for Ormonde, those for West of Duddon look like they should be for Walney 3 & 4 (Walney Extension) and those for Gwynt y Môr look like they are those for West of Duddon Sands.	Figures have been checked and updated in the CEA and presented the offshore ornithology assessment.	No
Mon_054_324_010623	S42/S44	Email	NRW (A)query why in Table 10.87there are only two seasons (breeding and non-breeding) considered for gannet, when from Furness (2015) there are two non-breeding seasons for gannet (spring/pre-breeding and autumn/post-breeding) as well as the breeding season. As a result, we suggest that the figures presented for the different wind farms are also checked.	The cumulative assessment presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement considers non-breeding seasons from Furness (2014).	No
Mon_054_325_010623	S42/S44	Email	With reference to Table 10.97, as the relevant BDMPS for kittiwake in Furness (2015) is the UK Western Waters and Channel, the projects located in the Channel should also be included in cumulative impacts for this species, i.e. Rampion 1 and Rampion 2 should be included for cumulative kittiwake collision.	Projects located in the Channel (Rampion 1 and 2) and within the UK Western Waters and Channel are included in the CEA presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_054_326_010623	S42/S44	Email	NRW (A)recommend that the collision figures included for Awel y Môr in Table 10.97 Expected annual collision mortality across relevant wind farms for the five species considered, are checked, as these do not	Awel y Môr collision figures are included in the CEA presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No





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			look consistent with those presented in Table 41 of the Awel y Môr Offshore Ornithology Chapter of the ES8.70_D8_AyM_ES_Volume_2_Chapter_4_Offshore_Ornithology_RevC (planninginspectorate.gov.uk)		
Mon_054_327_010623	S42/S44	Email	As a result of the points above, it is likely that the cumulative totals will change in the final submission hence we have not made any comments on the overall level of cumulative impacts or their significance. Table 1: Final Erebus species abundance figures in site+2km buffer for inclusion in cumulative displacement assessments: Table 1. Final Erebus species annual collision predictions for inclusion in cumulative collision assessments (Option 2). All figures from Erebus SEI addendum (link above) –gannet from Table 5-31 and all other species from Table 5-36	The cumulative collision assessment presented in the CEA in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement has been updated.	No
Mon_054_328_010623	S42/S44	Email	It would be useful if the displacement matrices presented in the cumulative assessments could indicate where 1% of baseline mortality of the relevant population is exceeded.	Cells within each CEA matrix in the species-specific sections were shaded red to indicate where the displacement mortality would surpass the 1 % threshold of background mortality of the relevant regional or national population for each species. These displacement matrices are shown in the CEA presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_054_329_010623	S42/S44	Email	NRW (A)query why Manx shearwater has not been assessed for cumulative displacement impacts both during construction and operation/maintenance, as we consider this should be assessed.	Noted and Manx shearwater are now assessed fully in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_054_330_010623	S42/S44	Email	NRW (A)suggest that cumulative collision assessments of migrant species are also undertaken, at least with Mona, Morgan generation assets, Morecambe generation assets and Awel y Môr as a minimum, as there is the potential that such birds could encounter these sites.	Cumulative collision assessment of migrant species is included in the CEA presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement. Manx shearwater has been assessed for cumulative displacement impacts.	No
Mon_054_331_010623	S42/S44	Email	Volume 2, Chapter 10 Offshore Ornithology, Section 10.10.3 Combined Displacement and Collision Risk NRW (A)welcome that combined cumulative displacement and cumulative collision have been assessed for gannet (and kittiwake) in Section 10.10.3. However, the combined impact of displacement plus collision risk for the Mona project alone should also be undertaken for these species	The combined cumulative displacement and collision for northern gannet and black-legged kittiwake for the Mona project alone has been updated and is included in the CEA presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_054_332_010623	S42/S44	Email	Volume 6, Annex 10.6: Offshore ornithology cumulative effects assessment population viability assessment technical report NRW (A)welcome that in Annex 10.6Population Viability Analyses (PVAs)have been undertaken where predicted cumulative impacts equate to more than 1% of baseline mortality of the relevant populations, and that these have been undertaken using the NE/JNCC PVA tool. Based on the current figures this has been undertaken for annual cumulative (EIA scale) displacement impacts for guillemot and operational collision impacts for great black-backed gull. Given the lack of evidence for how density dependence acts on the populations for which PVAs have been undertaken, NRW (A)agree that these have been run as density independent models. However, further to our comments on the cumulative figures in Paragraph 285above, these will need to be revised and PVAs updated accordingly, and the species and impacts requiring PVAs may also need to be updated.	PVA has been undertaken where predicted cumulative impacts equate to more than 1% of baseline mortality of the relevant populations. The results are presented in Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report of the Environmental Statement.	No
Mon_054_333_010623	S42/S44	Email	NRW (A)welcome that the models have been run for 5,000 simulations and that the tool input parameter log files have been included. However, all results of the PVA, including graphs of Counterfactual of Population Size (CPS)and Counterfactual of Growth Rate (CGR)and population size under baseline and impacted conditions should also be presented.	Counterfactual Population Size (CPS), Counterfactual of Growth Rate (CGR) and population size under baseline and impacted condition are presented in Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report of the Environmental Statement as well as graphs and output logs.	No
Mon_054_334_010623	S42/S44	Email	NRW (A)note that the PVAs have been run excluding a 'burn in' and it has been assumed that any impacts on populations commenced the year following latest population counts, which for all models appears to be 2023. As advised during EWG4(February2023) and in our subsequent follow up advice, NRW (A)'s understanding is that the burn-in is done as a separate component and before the main PVA runs—the burn-in involves running baseline PVA simulations for n burn-in years and outputting the age structures	PVAs have been parameterized with a 5-year burn-in period to include age structure from burn-in run period. PVAs are presented in Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report of the Environmental Statement.	No -





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			that are obtained at the end of this period. This age structure is then used as the initial age structure within the main PVA runs. The burn-in run, and main PVA run are identical except in the way that the initial age structure is specified. Therefore, NRW (A)advise that the PVAs are parameterised using a 5-year burn-in period, with the impacts set to commence when the project is anticipated to start operating and to run for the lifetime of the project, and with the starting population being the latest count for the site in question. NRW (A) therefore advise that the models are updated to account for this.		
Mon_054_335_010623	S42/S44	Email	Volume 2, Chapter 10 Offshore Ornithology, Paragraph 10.10.1.64discusses reduction in growth rate and decrease in population size of the guillemot population and Paragraph 10.10.2.10discusses reduction in growth rate of the great black-backed gull population. NRW (A)note that these reductions in growth rate and population size are a reference to the CGR and CPS, which are the ratio of the impacted growth rate or population size to that predicted in the absence of the impact. They therefore indicate how much smaller the growth rate or population size may be following the imposition of any given magnitude of impact. However, this is not the same as a decrease in the growth rate or population size, but rather that one (the impacted growth rate or population size) will be smaller than non-impacted—i.e. they indicate how much lower the impacted growth rate or population size will be compared to the projected unimpacted growth rate or population size—so not relative to the current population size or growth rate. NRW (A)suggest that the wording in Paragraphs 10.10.1.6.4 and10.10.2.10is amended to reflect this interpretation of the counterfactuals. For example, in Paragraph 10.10.1.6.4for guillemot this should say that at the worst-case scenario of 70% displacement and 10% mortality, the population after 35 years will be 13.21% lower than it would have been in the absence of the additional mortality, and the population growth rate would be reduced by 0.39%. This interpretation of the counterfactuals should also be considered in the wording in Annex 10.6.The PVA tool output graphs of population size under baseline and impacted (i.e. with the cumulative impact) scenarios should be presented (or included in Annex 10.6) to back up the statement in Paragraph 10.10.2.11that "it is assumed that despite any additional mortality, the population is still expected to continue to grow and will be larger after 35 years than that what is currently recorded."	The suggested wording has been used to describe the impacted growth rate and population size PVAs in Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report of the Environmental Statement.	No
Mon_054_336_010623	S42/S44	Email	HRA Stage 1: Screening Report As has been discussed during the Offshore Ornithology EWGs (particularly EWG3 and EWG4 in November2022and February 2023 respectively), NRW (A)do not agree with the approach to LSE screening as set out in the HRA Screening Report. This is because LSE is a coarse screening filter, should be simple and if further evidence is brought in, then effectively this should be part of the appropriate assessment. This provides a transparent approach that can be followed through the Stage 2 ISAA. Therefore, NRW (A)would expect all sites where a qualifying feature has been recorded on the development site and where there is potential connectivity and an impact pathway and hence the potential to undermine the conservation objectives for the feature, to be screened in for LSE and carried through to the Stage 2 ISAA. Any additional work looking at, for example apportioning impacts, size of predicted collision or displacement impacts and assessments of predicted impacts against baseline mortality etc. should be included in the Stage 2 ISAA. NRW (A)advise Furness (2015) is used to identify potential connectivity in the non-breeding season.	The updated approach to the HRA Stage 1 Screening Report has been discussed and agreed through the evidence plan process.	No
Mon_054_337_010623	S42/S44	Email	Therefore, NRW (A)do not agree that sites and features should be screened out from LSE for the project alone based on predicted impacts equating to <1% of baseline mortality. Additionally, NRW (A)does not agree that sites are screened out of in-combination assessments where the predicted impact from the project alone is <0.5% of the baseline mortality of the site population, as while 0.5% of baseline mortality can be considered to be insignificant in the context of the population, this does not mean that this level of additional mortality should not be added to an assessment of in-combination impacts. Whilst these approaches may have been taken for the Round 4 Plan Level HRA, NRW (A)does not consider these assessment principles to be relevant at the project level, as the approach does not take into account the level of granularity required at the individual project level.	The updated approach to the HRA Stage 1 Screening Report has been discussed and agreed through the evidence plan process.	No
Mon_054_338_010623	S42/S44	Email	Based on the above, NRW (A)consider that LSE cannot be discounted for the following Welsh sites alone and in-combination: Liverpool Bay / Bae Lerpwl SPA –red-throated diver, common scoter (non-breeding displacement, habitat loss, indirect effects on prey) (note taken through to Stage 2 ISAA) •Aberdaron Coast and Bardsey Island / Glannau Aberdaron ac Ynys Enlli SPA –Manx shearwater (breeding displacement) •Grassholm SPA –gannet (breeding and non-breeding displacement, collision risk and combined displacement plus collision) (note taken through to Stage 2 ISAA for in-combination	The HRA Stage 1 Screening Report includes Welsh designated sites and Chapter 1.3: HRA Stage 2 ISAA Part 3 – SPA assessments presents all sites and species screened into stage 2 of the HRA assessment.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			disturbance/displacement plus collision only) •Skomer, Skokholm and seas of Pembrokeshire / Sgomer, Sgogwm a moroedd Penfro SPA –Manx shearwater (breeding displacement), puffin, razorbill1, guillemot1(non-breeding displacement); lesser black-backed gull, kittiwake1(non-breeding collision)•Anglesey Terns / Morwenoliaid Ynys Môn SPA –roseate tern, common tern, Arctic tern, Sandwich tern (passage collision)•The Dee Estuary SPA / Ramsar –non-breeding waterbirds (passage collision). Sandwich tern, common tern (SPA only, passage collision).•Lavan Sands, Conway Bay / Traeth Lafan SPA –non-breeding waterbirds (passage collision), Dyfi Estuary / Aber Dyfi SPA –Greenland white-fronted goose (passage collision)•Burry Inlet SPA / Ramsar –non-breeding waterbirds (passage collision)		
Mon_054_339_010623	S42/S44	Email	NRW (A)understands that a revised approach to LSE screening for offshore ornithology will be taken for the final submission and that this approach is currently being reviewed and discussed through the EWG. NRW (A)will continue to input to these discussions.	The updated approach to the HRA Stage 1 Screening Report has been discussed and agreed through the evidence plan process.	No
Mon_054_340_010623	S42/S44	Email	HRA Stage 2: Information to Support Appropriate Assessment (ISAA) Report As noted for the LSE screening above, NRW (A)consider the additional sites and features listed above should also be screened in for LSE and taken through to the HRA Stage 2 ISAA. All work considering and explaining what may potentially happen in terms of apportioned impacts, size of predicted collision or displacement impacts and assessments of predicted impacts against baseline mortality etc. should be presented and considered in the Stage 2 ISAA and not at LSE screening. This may be based on quantitative or qualitative assessments depending on evidence available and assessments can be very short or require more detail. Where quantitative assessments are possible/used, NRW (A)suggest use of <1% of baseline mortality to rule out Adverse Effect on Site Integrity (AEOSI)from the project alone or incombination in the ISAA integrity assessment, with further detailed assessment of any site/feature combinations where predicted mortality exceeds 1% of baseline mortality, for example, through PVA and consideration of impacts against conservation objectives.	The updated approaches to the HRA Stage 1 Screening Report and ISAA report have been discussed and agreed through the evidence plan process. As discussed, a 'two step' integrity test has been carried out in the ISAA. This involves a high level initial step 1 assessment to determine those SPAs with low risk of Adverse Effect on Integrity (AEOI), and a more detailed step 2 assessment for those SPAs where there is greater risk of an AEOI.	No
Mon_054_341_010623	S42/S44	Email	Volume 6, Annex 10.5: Offshore ornithology apportioning assessment As noted above, NRW (A)consider that all work on apportionment of impacts should be undertaken as part of the HRA and not as part of LSE screening.	The updated approach to the HRA Stage 1 Screening Report has been discussed and agreed through the evidence plan process. This includes apportionment of impact at the LSE screening stage.	No
Mon_054_342_010623	S42/S44	Email	NRW (A)suggest that the list of SPA colonies for the different species presented in Appendix A of Annex 10.5(and the relevant species tables within this annex) are checked, as for the Welsh sites at least, there are some colonies listed as being SPAs, that are not designated as SPAs, for example: •Great Orme and Little Orme is incorrectly listed as being an SPA. However, Great Orme's Head is a designated SSSI with breeding guillemot, razorbill and kittiwake as features—as Mona is located within mean-maximum foraging range of all three of these species from this SSSI, a quantitative assessment of displacement for guillemot and razorbill and of collision for kittiwake should be undertaken for EIA within the ES, as impacts to SSSIs with connectivity to Mona have not been assessed anywhere within the PEIR. Little Orme's Head is also a designated SSSI with breeding cormorant as a feature, but we note that Mona is located outside of mean-maximum foraging range from this site for this species. •South Stack is not a designated SPA or SSSI in its own right, but is part of the Holy Island Coast SPA and SSSI. Both sites do not have seabird notified features. For Welsh designated sites, we suggest considering: Natural Resources Wales / Find protected areas of land and sea	Collision and displacement impacts have been apportioned to SSSIs sites with seabird features within the foraging ranges of the Mona Array Area. Results are presented in volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement. The impact of the increase in baseline in mortality on the common guillemot breeding population at Great Orme's Head SSSIs is investigated in Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report of the Environmental Statement. No other species was investigated due to apportioning highlighting the impact did not go above 1% hence no further assessment needed. The ES chapter assessed the impact of collision and displacement on features of SSSI sites connected to the Mona Array Area.	No
Mon_054_343_010623	S42/S44	Email	NRW (A)do not agree with Manx shearwater being screened out for apportionment of impacts to colonies.	Apportioning has been undertaken for Manx shearwater and presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement.	No
Mon_054_344_010623	S42/S44	Email	With reference to Breeding season apportionment, NRW (A) welcome the use of the NatureScot method for apportionment of impacts in the breeding season.	The Applicant notes your response	No
Mon_054_345_010623	S42/S44	Email	With reference to Non-breeding season apportionment, it appears that the number of adult and immature birds at each colony used in the non-breeding season apportionment are not those from the Tables in	To apportion non-breeding season effects from the Mona Array Area between relevant SPAs, the contribution of adult	No





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			Appendix A of Furness (2015) and we therefore assume are updated figures. However, the respective non-breeding season BDMPS total figures for adults and juveniles used in the calculations have not been updated to account for new colony data, but use those presented in the tables in Appendix A. NRW (A)do not consider this to be appropriate as updating the SPA colonies figures, presented in the tables in Appendix A of Furness (2015) with more recent figures is not recommended, unless there is evidence to suggest that the colony in question has increased or decreased significantly relative to other colonies.	and immature birds from an individual SPA as a proportion of the BDMPS defined in Furness (2015) was utilised.	
Mon_054_346_010623	S42/S44	Email	NRW (A)recommend that the data presented in Furness (2015) Appendix A is used. The advised approach is to apportion seabird species to a specific SPA population by using the proportion of the relevant colony figure against the total BDMPS population during each respective non-breeding season. Whether the colony figure in the BDMPS tables used is the adult figure or that for all ages depends on the approach to impact assessment (for example if a PVA model is being employed and impacts within the model are specified as changes to adult survival, then calculating the proportion of adults within the relevant BDMPS would be the appropriate approach). Worked example: To apportion the number of gannets within the UK Western Waters BDMPS to the Grassholm SPA during the spring migration, the data within Appendix A, Table 17should be used (Furness 2015); During the spring season for the UK western waters BDMPS, the number of Grassholm SPA adult birds is 78,584 birds whilst the total number of gannets of all ages across the BDMPS is 661,888 birds. Therefore, the proportion of Grassholm SPA adult birds across the BDMPS during spring can be calculated as 11.9%. Note: birds of all ages are used for the population of seabirds across the BDMPS whilst only adults are used for the SPA population. This is due to breeding colony SPAs being designated based on breeding individuals or pairs, rather than all birds at the colony.	To apportion non-breeding season effects from the proposed development sites between relevant SPAs, the contribution of adult and immature birds from an individual SPA as a proportion of the BDMPS defined in Furness (2015) was utilised.	No
Mon_054_347_010623	S42/S44	Email	With reference to Apportionment of age classes, as raised previously during Offshore Ornithology EWG3 and EWG4, NRW (A)do not agree with the use of the PVA stable age structures, as it is very difficult to say that this is what it is, at the specific offshore site in a specific season. NRW (A)currently advise that proportions of adults and immatures are based on age-class information from site-specific surveys. We note the difficulties associated with ageing some species from digital aerial data and currently recommend that in the absence of site-specific information on age classes, a precautionary approach assuming all adult-type birds are adults is adopted.	Where possible, site-specific age-classes from Digital Aerial Surveys (DAS) were used for age-class apportioning within the breeding season as advised by the Expert Working Group. If age data was not available, all birds were assumed to be adult birds. Methodology is presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement.	
Mon_054_348_010623	S42/S44	Email	With reference to Sabbaticals, as previously noted during EWG3, NRW (A)currently advise that sabbaticals are not included/taken into consideration, therefore sabbaticals should not be removed from impact assessments.	Sabbaticals have been included in adults impacts for the purpose of the impact assessment.	No
Mon_054_349_010623	S42/S44	Email	Habitats Regulations Assessment Stage 2 Information to Support Appropriate Assessment Report, Section 1.10 Assessment of Potential Adverse Effect on Integrity: Offshore ornithology –Liverpool Bay SPA Assessment of Impacts NRW (A)agree that an Environmental Management Plan (EMP) should be produced and secured through a condition in the marine licence(s). The EMP should include provisions for a vessel management plan (to include provisions for vessels and vessel transit corridors, measures to minimise disturbance to rafting seabirds etc.) and planning for accidental spills, address all potential contaminant releases and include key emergency details.		No
Mon_054_350_010623	S42/S44	Email	As noted in the ISAA report the new conservation advice package is now available for the Liverpool Bay SPA and is available from: JP046 Edition 4 Liverpool Bay Bae Lerpwl SPA Conservation Advice Package. Pdf Assessments need to be made against the new conservation objectives, hence NRW (A)welcome the commitment in the Stage 2 ISAA report that these will be fully reviewed and considered in the ISAA submitted with the application for consent.	The updated conservation package for the Liverpool Bay SPA has been considered in the ISAA submitted with the application for consent.	No
Mon_054_351_010623	S42/S44	Email	With reference to Disturbance and displacement from airborne sound and presence of vessels and infrastructure> Construction and decommissioning phase > Red-throated diver and common scoter, for the Mona project alone, NRW (A)advise that rather than taking a 4x4km area of the offshore export cable route to be impacted by displacement, the approach should take the area of sea occupied by a cable installation vessel plus a 2km buffer all around the vessel. This area should then be multiplied by the worst-case scenario number of cable laying vessels that may be present within the cable corridor area at any one time to give the total area that may be affected by displacement due to the presence of the vessel(s) (as has been done by other recent projects, for example Awel y Môr, Norfolk Boreas). NRW	We have followed the approach taken by Awel y Môr and Norfolk Boreas by using 2 km buffer around each vessel x number of vessels - assuming 100% displacement and 0.5-1% mortality. With reference to disturbance and displacement, the assessment for red-throated diver and common scoter is presented in Volume 2, Chapter 5: Offshore Ornithology ES.	No





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			(A)then advise that 100% displacement across this area is assumed and as mortality resulting from cable laying will be temporary, we recommend a range of 0.5-1% mortality is considered.		
Mon_054_352_010623	S42/S44	Email	NRW (A) welcome the assessment of in-combination impacts from the cable laying activities for Mona with those of Awel y Môr combined with impacts from the operational wind farms located within the SPA. Any updated figures for impacts from Mona alone should be taken through to the in-combination assessment.	The Applicant notes your response	No
Mon_054_353_010623	S42/S44	Email	As noted during Offshore Ornithology EWG4, NRW (A)suggest consideration could be given to timing restrictions on Mona's cable laying through the SPA so that the cable is not laid during key times for the red-throated diver and common scoter features (i.e. avoid November-March).	Considerations are being given to timing restrictions using latest findings from digital aerial surveys carried out in the SPA (HiDef Aerial Surveying Limited, 2023).	No
Mon_054_354_010623	S42/S44	Email	With reference to Disturbance and displacement from airborne sound and presence of vessels and infrastructure > Operations and Maintenance Phase(O&M)> Red-throated diver and common scoter: In addition to consideration of disturbance and displacement from presence of vessels for cable repairs and maintenance from Mona alone, assessment should also be made of disturbance and displacement of these qualifying features on vessel movements associated with O&M of the array itself. As the port location is currently unknown there is the potential that O&M vessels may transit through the Liverpool Bay SPA enroute from port to the array and vice versa. This should also be considered in-combination.	The impact of vessel movement associated with operation and maintenance for project alone and in-combination is presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_054_355_010623	S42/S44	Email	Habitats Regulations Assessment Stage 2 Information to Support Appropriate Assessment Report, Section 1.10.4 Assessment of adverse impacts in-combination, Grassholm SPA Assessment of Impacts. NRW (A)note that Grassholm SPA has only been taken through to the Stage 2 ISAA assessment for incombination assessment of impacts of collision plus displacement for gannet. As noted above, as the Mona project is located within foraging range of gannets from Grassholm SPA, gannets have been recorded on the Mona survey area and gannets are considered to be sensitive to displacement and collision impacts. NRW (A)consider that there is connectivity and hence this site and feature should be screened in as an LSE cannot be ruled out, and taken through to the HRA Stage 2 for the project alone. All work considering apportioned impacts, size of predicted collision or displacement impacts, and assessments of predicted impacts against baseline mortality etc. should be presented and considered in the Stage 2 ISAA and not at LSE screening.	Report has been discussed and agreed through the evidence plan process. This includes apportionment of impacts at the LSE screening stage. The Grassholm SPA has been screened into the HRA Stage 2 ISAA- Part 3 for northern gannets for displacement, collision risk and incombination effects.	No
Mon_054_356_010623	S42/S44	Email	Please note our comments on the apportionment of impacts in Section 1.6.2.5.1 of the current document. With reference to In-combination disturbance and displacement from airborne sound, presence of vessels and infrastructure and collision risk combined impacts, Paragraph 10.10.4.87states: "During all phases of the Mona Offshore Wind Project, potential displacement and collision impacts are attributed to Grassholm SPA from the Mona Offshore Wind Project. The in-combination assessment therefore combines these impacts, alongside impacts from other plans and projects within mean-maximum foraging range + 1SD (Woodward et al.,2019) attributed to the Grassholm SPA. "Whilst inclusion in the in-combination assessment of impacts from other plans and projects within foraging range is acceptable for the breeding season, annual impacts need to be considered and hence non-breeding season(s) impacts from a wider range of projects, i.e. all those located within the relevant non-breeding season BDMPS in Furness (2015) (in this case for gannet is the UK western waters) should be included in Table 1.266Grassholm SPA predicted annual mortality rate of breeding adult norther gannet resulting from collision risk, disturbance and displacement from projects considered in-combination during the operation and maintenance phase.	All relevant project within the non-breeding season BDMPS 'UK Western Waters' of northern gannet were included in the CEA presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	
Mon_054_357_010623	S42/S44	Email	With regard to the level of predicted impact included in Table 1.266for the Mona project, consideration should be given to our comments on the apportionment of impacts to colonies in Section 1.6.2.5.1 of the current document, and the level of impact amended accordingly.	Consideration of comments on the apportioning assessment are detailed and addressed within Volume 6, Annex 5.5: Offshore Ornithology Apportioning Technical Report.	No
Mon_054_358_010623	S42/S44	Email	Consideration should also be given to our comments in Section 1.6.2.2.3 of the current document, regarding the numbers and other plans and projects to include within the in-combination assessment and the total in-combination level of impact amended accordingly.	Projects where effects were not historically assessed were included in the CEA presented in Volume 2, Chapter 5: Offshore Ornithology and the in-combination assessment in the ISAA and treated as unavailable. A more detailed qualitative assessment has been added to further assess the historic offshore wind projects. This has been discussed with the EWG and the Applicant has provided a detailed response via a technical note.	No





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Mon_054_359_010623	S42/S44	Email	Reference should be given to the year and source of the Grassholm gannet colony size count given in Paragraph 1.10.4.91–it is assumed that this is based on the 2015 count of 36,011 Apparently Occupied Nests (AONs), which equals 72,022 breeding adults. Reference should also be given to the source of the back ground mortality of 0.081 given in Paragraph 1.10.4.91–it is assumed this is calculated from the adult gannet survival rate of 0.919 in Horswill & Robinson (2015).	Reference (including year) to Grassholm northern gannet colony count is given in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement. Background mortality is calculated form Horswill & Robinson (2015) and presented in Volume 6, Annex 5.2: Offshore ornithology displacement technical report of the Environmental Statement.	No
Mon_054_360_010623	S42/S44	Email	Minor Comments NRW (A) recommend that all tables of figures/information are cross-checked across all documents in the final submission to ensure consistency where multiple tables are presenting the same figures/information. We have identified inconsistencies across tables and also errors in calculations of figures shown, for example:	All tables have been cross-checked to ensure consistency across offshore ornithology technical reports and Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement.	No
Mon_054_361_010623	S42/S44	Email	There are some differences in the breeding season population sizes presented in Chapter 10, Tables 10.12 and 10.13. There are also inconsistencies between the breeding season population sizes presented in these tables and the equivalent tables –Annex 10.2, Table 1.2 and Annex 10.3, Table 1.4.	Breeding population size has been cross-checked to ensure consistency across offshore ornithology technical reports and Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement.	No
Mon_054_362_010623	S42/S44	Email	The breeding season reference population and baseline mortalities presented in Chapter 10, Table 10.31 are slightly different to the figures for these given in Table 10.24 for razorbill displacement during construction and those in Annex 10.2, Table 1.35	Breeding season reference and baseline mortalities has been cross-checked to ensure consistency across offshore ornithology technical reports and Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement.	No
Mon_054_363_010623	S42/S44	Email	There is an error in the annual razorbill Lower Confidence Interval (LCI)upper number of birds subject to mortality in Annex 10.2, Table 1.35–if the seasonal upper numbers for the LCI in this table are summed (101+6+3+6), the total is 116 rather than the 130 as presented in Table 1.35.	Razorbill subject to mortalities have been checked in Volume 6; Annex 5.2: Offshore ornithology displacement technical report of the Environmental Statement.	No
Mon_054_364_010623	S42/S44	Email	For the graphs of predicted monthly collisions predicted for each species in Annex 10.3, Figures 1.2–1.7, NRW (A)suggest that these are colour coded to show the specific seasonal definitions used (for example for kittiwake colour code the months by the spring/pre-breeding, breeding and autumn/post-breeding seasonal definitions used) rather than just simply breeding and non-breeding.	Colour coding has not been widely used in the offshore ornithology assessments as the Applicant is mindful of readers who may have colour blindness.	No
Mon_054_365_010623	S42/S44	Email	In Annex 10.3 for all species, the tables of predicted collision mortalities across seasons present the seasonal and annual ranges of predicted collisions (i.e. lower and upper confidence intervals) and the proportions these equate to of baseline mortality. NRW (A)recommend that these tables also present the mean predicted number of collisions and what these equate to of baseline mortality. As an example for kittiwake, we suggest that the collision mortality column for the annual total should have 37 (range: 23–55) and then the % these predictions equate to of baseline mortality.	This information is presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_060_087_010623	S42	Email	Ornithology Comments Detailed Comments Volume 2, chapter 10: Offshore ornithology A combined displacement and collision risk assessment should be made for black-legged kittiwake and gannet. This has been done within the cumulative effects assessment section, but should also be done for the project alone.	The combined cumulative displacement and collision for northern gannet and black-legged kittiwake for the Mona project alone is included in the CEA presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_060_088_010623	S42	Email	Table 10.8: Species/groups and sum of raw counts recorded during the March 2020 to February 2022 surveys, in order of total abundance. The second most frequently recorded species/species group from digital aerial surveys was guillemot/razorbill. This is a high number of records identified as guillemot/razorbill compared to those identified to either guillemot or razorbill. We therefore have concerns as to whether apportioning guillemot/razorbill to the individual species based on proportions of identified guillemots and razorbills is appropriate here. This has been discussed through the EWG and we will continue to input to these discussions.	Updated auk ID rates from the Digital Aerial Surveys (DAS) have been used to generate population estimates for auk species. The population estimates are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement.	No
Mon_060_089_010623	S42	Email	Table 10.9: Designated sites and relevant qualifying interests for the offshore ornithology assessment. Sites are ordered according to distance from the Mona Array Area within each category of site: marine SPAs, breeding seabird colony SPAs and passage/wintering bird SPAs. Note that Atlantic puffin is also a named qualifying feature of Skomer, Skokholm and the Seas off Pembrokeshire SPA as well as being part	SPA sites/colonies within individual species (mean-max foraging range + SD) from the Mona Array Area and the Mona Offshore Cable Corridor are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation	No





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			of the seabird assemblage. In addition, European storm petrel is also a component of the seabird assemblage qualifying feature of this site.	technical report of the Environmental Statement. This includes the Skomer, Skokholm and the Seas off Pembrokeshire SPA and seabird qualifying species.	
Mon_060_090_010623	S42	Email	10.4.4Important Ecological Features (IEFs)There are discrepancies with which species are identified in table 10.10 as being screened in for assessment of significant effects and the subsequent tables. For instance, great black-backed gull and herring gull appear to have been screened out for assessment of significant effects according to table10.10, however both appear in table 10.11. Northern fulmar is then missing from tables 10.12, 10.13, and 10.14.	Important Ecological Features (IEFs) includes northern fulmar, great black-backed gull and herring gull. The significant of effect is presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_060_091_010623	S42	Email	10.4.4.5"Species that were recorded in very small numbers or very infrequently during the site-specific surveys and the desktop studies review are excluded because a population-level impact will be negligible and thus undetectable." What number is classed as "very small numbers" or "very infrequently"? It is not necessarily the case that small number would immediately mean a negligible population-level impact, particularly where small populations are concerned.	The rational for dealing with species that were recorded in very small numbers or very infrequently during the site-specific surveys and the desktop studies review is clarified in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_060_092_010623	S42	Email	Table 10.12: Calculation of regional population during the breeding season We are uncertain of the appropriateness of the approach that has been taken to calculate the regional breeding season reference populations. We suggest that approaches to calculating regional breeding reference populations be explored collaboratively through the offshore ornithology EWG.	There could be potential inaccuracies associated with the approach proposed by NRW at the EWG with broad assumptions about immature populations which result in an increase in the total regional breeding population figure. As a more precautionary approach in the offshore ornithology chapter, the number of immature birds present in the regional BDMPS has been estimated using the ratio of immatures per breeding adult provided in the relevant species accounts in Furness (2015). This approach likely under-estimates the true count of juvenile and immature birds due to failing to account for juvenile and immature birds migrating across to UK colonies in the breeding season from wintering grounds outside of the UK. However, the approach used in the Environmental Statement results in a more precautionary assessment in-line with Natural England guidance due to making use of a much smaller total regional breeding population against which the impacts have been assessed. This approach has been discussed with the offshore ornithology EWG.	
Mon_060_093_010623	S42	Email	10.4.4.17We query the appropriateness of this approach to calculating a weighted average baseline mortality rate of all age classes given that the adult proportion in the population in table 10.14 does not equal the adult proportion in the population in table 10.12.We suggest that approaches to calculating a weighted average baseline mortality rate be explored collaboratively through the offshore ornithology EWG.	Revised weighted average baseline mortality are presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_060_094_010623	S42	Email	10.8.1.4We advise that an assessment of the impact of vessel disturbance is carried out, with particular focus on red-throated diver and common scoter disturbance within and around the Liverpool Bay SPA. This is relevant to both construction vessels and operations and maintenance vessels transiting through the SPA to the wind farm. It is also relevant to vessels during installation of the array cable, which is proposed to go through the SPA.	The impact of vessel movement associated with operation and maintenance for project alone and in-combination is presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_060_095_010623	S42	Email	10.8.1.28We advise that a quantitative assessment of the impact of vessel disturbance on common scoter within and around the Liverpool Bay SPA is carried out, based on the predicted quantity and duration of cable installation vessels. In light of evidence of vessel displacement, we advise that a 2.5km buffer around vessels is used for the assessment of 100% displacement of common scoter (Fliessbach et al., 2019). Lawson et al 2016 can be used as a source of common scoter density.	We have followed the approach taken by Awel y Môr and Norfolk Boreas by using 2 km buffer around each vessel x number of vessels - assuming 100% displacement and 0.5-1% mortality. With reference to disturbance and displacement, the assessment for red-throated diver and common scoter is presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement. Note that NRW advised the use of the recently published HiDef report for red-throated diver and common scoter densities due to the age of the Lawson 2016 data and hence, new	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				information in the form of the HiDef (2023) report is available and therefore was utilised.	
Mon_060_096_010623	S42	Email	10.8.1.29 We advise that a quantitative assessment of the impact of vessel disturbance on red-throated diver within and around the Liverpool Bay SPA is carried out, based on the predicted quantity and duration of cable installation vessels. In light of evidence of vessel displacement, we advise that a 2km buffer around vessels is used for the assessment of 100% displacement of red-throated diver (Burt et al., 2017, Burger et al., 2019). Lawson et al 2016 can be used as a source of red-throated diver density.	The impact of vessel movement associated with operation and maintenance for project alone and in-combination is presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement. Note that NRW advised the use of the recently published HiDef report for red-throated diver and common scoter densities due to the age of the Lawson 2016 data and hence, new information in the form of the HiDef (2023) report is available and therefore was utilised.	No
Mon_060_097_010623	S42	Email	Table 10.38European herring gull and lesser black-backed gull are both listed as having medium sensitivity to collision and low abundance in the study area, and has been assessed for significance. However, common gull is also listed as having medium sensitivity to collision and low abundance in the study area, but has not been assessed for significance. Why has common gull not been assessed?	Clarifications on the lack of assessment for common gull have been added to Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_060_098_010623	S42	Email	Table 10.38: Seabird species considered for assessment of collision based on sensitivity and abundance. Ornithological receptor Sensitivity to collision Razorbill is listed as having very low sensitivity to collision and high abundance in the study area, and has been assessed for significance. However it is not mentioned in the subsequent paragraphs where detail of the assessment is given. Is this a typographical error within the table?	Clarifications have been added to Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_060_099_010623	S42	Email	10.8.4.18, 10.8.4.19, Table 10.44: Atlantic puffin cumulative abundances for overlapping construction phase offshore wind projects for disturbance and displacement assessment. What mortality rate is used for fulmar? It is not listed in table 10.14, therefore it is not clear whether a similar weighted average across age classes has been calculated, or solely the adult survival rate has been used, and whether or not these values have been taken from Horswill & Robinson (2015) as for the other species in table 10.14.	Updates have been made to Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement to include northern fulmar mortality rates.	No
Mon_060_100_010623	S42	Email	Table 10.49: Guillemot cumulative abundances for potential overlapping construction phase offshore wind projects for disturbance and displacement assessment. Table 10.53: Razorbill cumulative abundances for overlapping construction phase offshore wind projects for disturbance and displacement assessment. & Table 10.59: Atlantic puffin cumulative abundances for overlapping construction phase offshore wind projects for disturbance and displacement assessment. The breeding season and non-breeding season abundance estimates for Erebus appear to be taken from the original Erebus Environmental Statement. Note that these numbers are incorrect as the unidentified auks were not apportioned to individual species based on the ratio of identified auks. The abundance estimates were updated in the "Project Erebus Supplementary Information Addendum" to apportion unidentified auks to species level, therefore these amended abundance estimates should be used in a Cumulative Effects Assessment. This applies to guillemot, razorbill, and puffin.	Erebus collision figures recommended by Statutory Nature Conservation Bodies (SNCBs) are included the CEA presented in Volume 2, Chapter 5: Offshore ornithology chapter of the Environmental Statement.	No
Mon_060_101_010623	S42	Email	10.10Cumulative effects assessment We do not consider it appropriate to base the cumulative (and hence also in-combination) assessments on so many unknowns for impacts from many of the relevant other projects. Whilst these historic projects may not have undertaken quantitative assessments, or assessments using current approaches, estimates will need to be generated for these unknown projects in order to undertake meaningful assessments. We suggest this should be explored collaboratively through the offshore ornithology EWG.	Projects where effects were not historically assessed were included in the CEA presented in Volume 2, Chapter 5: Offshore Ornithology and the in-combination assessment in the ISAA and treated as unavailable. A more detailed qualitative assessment has been added to further assess the historic offshore wind projects. This has been discussed with the EWG and the Applicant has provided a detailed response via a technical note.	No
Mon_060_102_010623	S42	Email	10.10.3Combined displacement and collision risk At present, the SNCBs regard the two impacts of collision and displacement as additive and advise that they should be summed. There is a risk of some degree of double counting as a bird that is displaced cannot collide with a turbine and vice versa, and so there is some level of precaution with this approach. We therefore welcome that an in-combination assessment has been made of combined displacement and collision risk for kittiwake and gannet. However, this should also be carried out for the Mona project alone.	The combined cumulative displacement and collision for northern gannet and black-legged kittiwake for the Mona project alone is presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No





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Mon_060_103_010623	S42	Email	Volume 6, annex 10.1: Offshore ornithology baseline characterisation Table 1.6: Mean-maximum foraging ranges with standard deviation (SD) for seabird species (Woodward et al., 2019). Sample sizes are shown in parentheses (i.e. no. of individuals tracked). We welcome the use of Woodward et al 2019 mean max plus 1 standard deviation foraging ranges. Note that we advise that breeding season foraging ranges for razorbill and guillemot are those within appendix 1 of Woodward et al 2019 which excludes data from Fair Isle where foraging range may have been unusually high as a result of reduced prey availability during the study year. Therefore, the foraging range to use for razorbill is 73.8km + 48.4km and for guillemot is 55.5km + 39.7km. Further, there are site-specific forging ranges for gannet. Those of relevance to Mona OWF are Grassholm SPA (foraging range max = 516.7km) and St Kilda SPA (foraging range max = 709km).	Foraging ranges used in the assessment have been updated in line with SNCBs comments and discussion through the evidence plan process. Updated foraging ranges are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement for each species.	No
Mon_060_104_010623	S42	Email	Volume 6, annex 10.2: Offshore ornithology displacement assessment Table 1.2: Calculation of regional population during the breeding season. We are uncertain of the appropriateness of the approach that has been taken to calculate the regional breeding season reference populations. We suggest that approaches to calculating regional breeding reference populations be explored collaboratively through the offshore ornithology EWG.	Following collaborative discussion on the regional breeding population calculations through the evidence plan process and recommendations from Natural England, Natural Resource Wales and JNCC, the proportion of juveniles and immatures were derived from the relevant Biological Defined Minimum Population Scales (BDMPS) tables listed in Appendix A of Furness (2015) and added to the adult population within foraging range of the Mona Array Area. The breakdown of regional populations taken from the SMP database are provided in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement for each species.	
Mon_060_105_010623	S42	Email	1.2.5.1 & Table 1.4: Demographic rates from Horswill and Robinson (2015) and population age ratios calculated from stable population models used to estimate average mortality for use in displacement matrices. We query the appropriateness of this approach to calculating a weighted average baseline mortality rate of all age classes given that the adult proportion in the population in table 1.4 does not equal the adult proportion in the population in table 1.2.We suggest that approaches to calculating a weighted average baseline mortality rate be explored collaboratively through the offshore ornithology EWG.	Revised Weighted average baseline mortality are presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_060_106_010623	S42	Email	Table A.122: Common guillemot modelled abundance (all behaviours and all ages classes) within the Mona Array Area plus associated buffer. Calendar Years 1, 2 and 3 for surveys: [March 2020 to February 2022]. Availability Bias used [0.2405]. Bio-season colour coded as in Table 1.1. Peak figures used in displacement assessment in each bio-season are outlined in bold. —A.128: Red-throated diver modelled abundance (all behaviours and all ages classes) within the Mona Array Area plus associated buffer. Calendar Years 1, 2 and 3 for surveys: [March 2020 to February 2022]. These tables appear to be based on the modelled abundance for each survey month, however the tables in Appendix B of Volume 6 Chapter 10.1 show that modelled abundances could not always be generated for every month for some species. Therefore, clarification is required as to which method(s) have been used to generate the monthly abundance estimates presented in Tables A.122-A.128 of Volume 6 Chapter 10.2.	Monthly species abundances are a mix of MRSea and design-based abundances, with MRSea estimates used in place of design-based estimates wherever possible. Further explanations are provided in Volume 6, Annex 5.2: Offshore ornithology displacement technical report of the Environmental Statement and in Volume 6, Annex 5.3: Offshore ornithology collision risk modelling technical report of the Environmental Statement.	No
Mon_060_107_010623	S42	Email	Volume 6, annex 10.3: Offshore ornithology non-migratory seabird collision risk assessment Table 1.1: Species biometrics and input parameters for CRM. We are content with use of the input parameters (biometrics, avoidance rates, nocturnal activity factors) used, which are consistent with those supplied by NE in their draft guidance. We also note that the review of avoidance rates by Ozsanlev-Harris et al. (2022) that informed the draft guidance on avoidance rates is now published and available from JNCC's website at: Review of data used to calculate avoidance rates for collision risk modelling of seabirds. We also agree with the use of a 70% reduction in gannet densities going into the CRM to account for macro avoidance.	The applicant notes your response.	No
Mon_060_108_010623	S42	Email	Table 1.4: Bio-season population sizes and average background mortality rate used within the assessment. The BDMPS populations for gannet, kittiwake, and Manx shearwater appear to have been calculated using the same method as for the displacement assessment (when comparing to the numbers presented table 1.2 in Volume 6: Annex 10.2 Offshore ornithology displacement assessment). Has the same method been used to calculate the population in the breeding season for the other species (great black-backed gull, herring gull, lesser black-backed gull, and fulmar)? We are uncertain of the	There could be potential inaccuracies associated with the approach proposed by NRW at the EWG with broad assumptions about immature populations which result in an increase in the total regional breeding population figure. As a more precautionary approach in the offshore ornithology chapter, the number of immature birds present in the	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			appropriateness of the approach that has been taken to calculate the regional breeding season reference populations as outlined in Volume 6: Annex 10.2 Offshore ornithology displacement assessment. We suggest that approaches to calculating regional breeding reference populations be explored collaboratively through the offshore ornithology EWG.	regional BDMPS has been estimated using the ratio of immatures per breeding adult provided in the relevant species accounts in Furness (2015). This approach assumes that all immatures associated with each breeding colony will be present within the foraging range defined for each species. The Applicant acknowledges there are also potential inaccuracies with this approach. This approach likely under-estimates the true count of juvenile and immature birds due to failing to account for juvenile and immature birds migrating across to UK colonies in the breeding season from wintering grounds outside of the UK. However, the approach used in the Environmental Statement results in a more precautionary assessment inline with Natural England guidance due to making use of a much smaller total regional breeding population against which the impacts have been assessed. This approach has been discussed with the offshore ornithology EWG.	
Mon_060_109_010623	S42	Email	Table 1.4: Bio-season population sizes and average background mortality rate used within the assessment. We query the appropriateness of the approach to calculating a weighted average of all age classes given that there is no description of how this has been calculated in the section, whether this is the same as was done within the displacement assessment, and the proportion of age classes used. We suggest that approaches to calculating a weighted average baseline mortality rate be explored collaboratively through the offshore ornithology EWG.	Revised weighted average baseline mortality are presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_060_110_010623	S42	Email	Volume 6, annex 10.5: Offshore ornithology apportioning assessment- Impacts during the breeding season have been apportioned to the SPAs and impacts during the non-breeding season apportioned to relevant colonies. However, there is no calculation of annual impacts apportioned to the SPAs.	Annual impact apportioned to the SPAs are presented in Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report of the Environmental Statement.	No
Mon_060_111_010623	S42	Email	1.2.4Age composition We advise that species that can be identified to age classes from digital aerial surveys should be done so. If it is not possible to assign age classes from digital aerial surveys, then all birds should be assumed to be adults. This therefore applies to each of the subsequent sections and tables where impacts to adults and immatures have been apportioned.	Where possible, site-specific age-classes from Digital Aerial Surveys (DAS) were used for age-class apportioning within the breeding season as advised by the Expert Working Group. Methodology is presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement.	No
Mon_060_112_010623	S42	Email	1.2.4 Age composition & 1.2.6.5We advise that, unless site-specific information on sabbatical rates is available, then all adults should be assumed to be breeding adults. This therefore applies to each of the subsequent sections and tables where impacts to adults and sabbaticals have been apportioned.	Sabbaticals have been included in adults impacts for the purpose of the impact assessment.	No
Mon_060_113_010623	S42	Email	1.2.5Species and age specific annual mortality We advise that species that can be identified to age classes from digital aerial surveys should be done so. If it is not possible to assign age classes from digital aerial surveys, then all birds should be assumed to be adults. If this is the case, the adult alone survival rate should be used to calculate baseline mortality rates.	Where possible, site-specific age-classes from Digital Aerial Surveys (DAS) were used for age-class apportioning within the breeding season as advised by the Expert Working Group. Methodology is presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement.	No
Mon_060_114_010623	S42	Email	1.2.6.2 and Table 1.5: Breeding common guillemot colony weighting factors used for apportioning SPA impacts of displacement (IND = individuals)Not all of the values to be able to replicate calculation of the colony weight have been provided -colony sea proportion is not given therefore the colony weight cannot be verified.	All values used to calculate the colony weighting factors are presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement.	No
Mon_060_115_010623	S42	Email	Table 1.5: Breeding common guillemot colony weighting factors used for apportioning SPA impacts of displacement (IND = individuals) The "Non-SPA Total" row of table 1.5 sums the non-SPA colonies which are listed in Appendix A table A1. However, the counts of the other rows are not the same between the two tables, therefore it is not clear what values have been summed to generate this "Non-SPA total". Regardless, non-SPA colonies should not be summed (in the case of colony counts column) or averaged	Non-SPA colonies are treated individually in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement.	No





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			(assuming this has been done for the distance to colony column). These non-SPA colonies should be treated individually, as is the case for SPA colonies.		
Mon_060_116_010623	S42	Email	1.3.7 Lesser black-backed gull & Table 1.25:Lesser black-backed gull colony weighting factors used for apportioning impacts of collision risk. Lesser lack-backed gull is a qualifying feature of Skomer and Skokholm and the Seas off Pembrokeshire SPA and Mona OWF is within mean max plus 1SD foraging range of the SPA. Impacts should therefore also be apportioned to this SPA. Given that the addition of this feature would alter breeding season apportioning calculations, and hence apportioned impact mortalities, we cannot agree with the results of this section on lesser black-backed gull.	Apportioning for lesser black-backed gull at Skomer and Skokholm and the Seas off Pembrokeshire SPA is presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement.	No
Mon_060_117_010623	S42	Email	Table A4:Black-legged kittiwake breeding colonies within the mean-max plus on standard deviation foraging ranges of the Mona Array Area and regional population (apparently occupied nests: AON) used to assess displacement during the breeding season. Kittiwake at Skomer, Skokholm and Seas off Pembrokeshire SPA is correctly listed as being within foraging range, however it is incorrectly labelled as not a qualifying feature. Kittiwake is a named component of the seabird assemblage.	Apportioning for black-legged kittiwake at Skomer and Skokholm and the Seas off Pembrokeshire SPA is presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement.	No
Mon_060_118_010623	S42	Email	TableA6: Lesser black-backed gull breeding colonies within the mean-max plus one standard deviation foraging ranges of the Mona Array Area and regional population (apparently occupied nests: AON) used to assess displacement during the breeding season. Lesser black-backed gull is a qualifying feature of Skomer, Skokholm and Seas off Pembrokeshire SPA and Mona OWF is within mean max plus 1SD foraging range of the SPA. Impacts should therefore also be apportioned to this SPA.	Apportioning for lesser black-backed gull at Skomer and Skokholm and the Seas off Pembrokeshire SPA is presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement.	No
Mon_060_119_010623	S42	Email	Volume 6, annex 10.6: Offshore ornithology cumulative effects assessment population viability assessment technical report We welcome that that the models have been run for 5,000 simulations and that the tool input parameter log files have been included. We recommend providing all results of the PVA, including CPS and CGR and graphs of population size under baseline and impacted conditions.	Counterfactual Population Size (CPS), Counterfactual of Growth Rate (CGR) and population size under baseline and impacted condition are presented in Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report of the Environmental Statement as well as the graphic outputs.	No
Mon_060_120_010623	S42	Email	1.1.1.3Given the comments made regarding calculation of the breeding BDMPS population, apportioning impacts to adults, immatures, and sabbaticals, lack of calculation of annual impacts, and multiple unknown quantitative in-combination impacts from other projects, we cannot agree that a PVA is required for solely common guillemot and great black-backed gull.	Rationale for taking forward species to PVA is presented in Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report of the Environmental Statement and is based on the assessment presented in the offshore ornithology chapter which accounts for this S42 response.	No
Mon_060_121_010623	S42	Email	HRA Screening Report, Screening Matrices and Integrity Matrices There has been discussion throughout the EWG meetings that we do not agree with the approach to LSE screening as outlined in the PEIR. LSE is a coarse screening filter, should be simple and if further evidence is bought in, then effectively this should be part of the appropriate assessment. This provides a transparent approach that can be followed through the RIAA. Therefore, we would expect all sites where a qualifying feature has been recorded on the development site and where there is potential connectivity (e.g. within foraging range) and a potential impact pathway (e.g. displacement or collision) and hence the potential to undermine the conservation objectives for the feature to be carried through to the AA phase. Any additional work looking at e.g. apportioning impacts and assessments of predicted impacts against baseline mortality etc. should be included in the AA. Therefore, we do not agree with the SPAs and features screened out of from LSE. We understand that a revised approach to LSE screening for offshore ornithology will be taken for the final submission and that this approach is currently being reviewed and discussed through the EWG. We will continue to input to these discussions.	As discussed through the evidence plan process, a 'two step' integrity test has been carried out in the ISAA. This involves a high level initial step 1 assessment to determine those SPAs with low risk of Adverse Effect on Integrity (AEOI), and a more detailed step 2 assessment for those SPAs where there is greater risk of an AEOI. This approach is described and presented in the HRA Stage 2 ISAA- Part 3.	No
Mon_060_122_010623	S42	Email	1.3.7.10Why is Skomer and Skokholm and the Seas off Pembrokeshire SPA classed as a marine SPA and not included in apportioning? The SPA contains breeding seabird colonies; therefore, a foraging range should be applied to the breeding colonies, and apportioning of impacts should be carried out. This appears to have been done for kittiwake within the Volume 6: Annex 10.5 Offshore ornithology apportioning assessment, but not for lesser black-backed gull, which is within foraging range of the Mona OWF.	Apportioning of relevant qualifying species at the Seas off Pembrokeshire SPA is presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement.	No





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Mon_060_123_010623	S42	Email	Table 1.7: Mean maximum foraging ranges of breeding seabirds (from Woodward et al., 2019). We welcome the use of Woodward et al 2019 mean max plus 1 standard deviation foraging ranges. Note that we advise that breeding season foraging ranges for razorbill and guillemot are those within appendix 1 of Woodward et al 2019 which excludes data from Fair Isle where foraging range may have been unusually high as a result of reduced prey availability during the study year. Therefore, the foraging range to use for razorbill is 73.8km + 48.4km and for guillemot is 55.5km + 39.7km. Further, there are site-specific forging ranges for gannet. Those of relevance to Mona OWF are Grassholm SPA (foraging range max = 516.7km) and St Kilda SPA (foraging range max = 709km).	Foraging ranges used in the assessment have been updated in line with SNCBs comments and discussion through the evidence plan process. Updated foraging ranges are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement for each species.	No
Mon_060_124_010623	S42	Email	Table 1.43: LSE matrix for marine ornithological features of the Skomer, Skokholm and the Seas off Pembrokeshire SPA. Footnote 'a' of the table states that "The Skomer, Skokholm and the Seas off Pembrokeshire SPA was not considered within the apportioning assessment (volume 6, annex 10.5: offshore ornithology apportioning assessment of the PEIR) for the species constituting the seabird assemblage (razorbill, guillemot, and kittiwake) due to the distance between the Mona Offshore Wind Project and this SPA (220km)." Yet in Volume 6: Annex 10.5 Offshore ornithology apportioning assessment, kittiwake is included in the apportioning calculations. Table 1.42 goes on to state "However, all SPAs for which collision risk and displacement impacts were apportioned, each species represented well below 0.5% of the baseline mortality rate for the relevant SPA populations." Which species are now being referenced in this sentence if they were not apportioned? Lesser lack-backed gull is a qualifying feature of Skomer and Skokholm and the Seas off Pembrokeshire SPA and Mona OWF is within mean max plus 1SD foraging range of the SPA. Impacts should therefore also be apportioned to this SPA.	Apportioning of relevant qualifying species at the Seas off Pembrokeshire SPA is presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement.	No
Mon_060_125_010623	S42	Email	1.6.1.7Table 1.43: LSE matrix for marine ornithological features of the Skomer, Skokholm and the Seas off Pembrokeshire SPA. & Table 1.73: Summary of European Sites and relevant qualifying features for which potential LSEs have been identified and screened in for further assessment in the ISAA. Given the points raised above and comments made in reference to Volume 6: Annex 10.5 Offshore ornithology apportioning assessment, we cannot agree with the results of table 1.43	Apportioning of relevant qualifying species at the Seas off Pembrokeshire SPA is presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement.	No
Mon_060_126_010623	S42	Email	Habitats Regulations Assessment Stage 2 Information to Support an Appropriate Assessment As noted for the HRA screening document, we do not agree with the approach to LSE screening and disagree with the SPAs and features taken through to the Appropriate Assessment stage. We understand that a revised approach to LSE screening for offshore ornithology will be taken for the final submission and that this approach is currently being reviewed and discussed through the EWG. We will continue to input to these discussions.	As discussed through the evidence plan process, a 'two step' integrity test has been carried out in the ISAA. This will involve a high level initial step 1 assessment to determine those SPAs with low risk of Adverse Effect on Integrity (AEOI), and a more detailed step 2 assessment for those SPAs where there is greater risk of an AEOI. This approach is described and presented in the HRA Stage 2 ISAA- Part 3.	No
Mon_060_127_010623	S42	Email	Table 1.3: A summary of all European sites for which the potential for LSE could not be discounted at the Stage 1 screening stage, and for which Appropriate Assessment is required. & Table 1.23: Conclusions against the conservation objectives of the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC for long-term habitat loss during the decommissioning phase. Given the comments made regarding Volume 6: Annex 10.5 Offshore ornithology apportioning assessment and Volume 6: Annex 10.3 Offshore ornithology non-migratory seabird collision risk assessment, we cannot agree with the results within these tables.	The approach to the potential for LSE has been revised and agreed with the offshore ornithology EWG since PEIR submission to address concerns, and all European Sites connected to the Mona Offshore Wind Project have been listed in Chapter 1.4: HRA Stage 1 screening report.	No
Mon_060_128_010623	S42	Email	1.10.2Baseline Information Given the comments made regarding Volume 6: Annex 10.5 Offshore ornithology apportioning assessment and Volume 6: Annex 10.3 Offshore ornithology non-migratory seabird collision risk assessment, we cannot agree that all relevant SPAs have been included here.	All SPAs with seabird features within the mean-max foraging + 1 SD of the Mona Array Area have been considered in the assessment.	No
Mon_060_129_010623	S42	Email	1.10.2.37Note that new conservation objectives for the Irish Seafront SPA have recently been published and are available here: hiips://jncc.gov.uk/our-work/irish-sea-front-spa/#conservation-adviceand should be referred to in the next iteration of this document.	Updated conservation objectives for the Irish Sea Front SPA have been considered in HRA Stage 2 ISAA Part 3 – SPA assessments.	No
Mon_060_130_010623	S42	Email	1.10.3.46,1.10.3.47,1.10.4.15 & 1.10.4.16This assessment of red-throated diver disturbance by construction vessels within the cable corridor uses an example of a 4km by 4km buffer around a vessel. This therefore gives a number of birds displaced and number of mortalities per vessel. However, as stated in table 1.235 there are predicted to be up to 91 vessels present at any one time. Therefore, the assessment, in terms of the conservation objectives regarding both population size and distribution, should be scaled to this total vessel presence. We advise that an assessment of red-throated diver vessel	We have followed the approach taken by Awel y Môr and Norfolk Boreas by using 2 km buffer around each vessel x number of vessels - assuming 100% displacement and 0.5-1% mortality. With reference to disturbance and displacement, the assessment for red-throated diver and	No





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			disturbance is undertaken by using a 2km buffer around each vessel such that the total impacted area also included the size of vessel. We are content with the displacement and mortality rates applied. We advise that a restriction to vessel works during the wintering period is considered to prevent disturbance to red-throated diver.	common scoter is presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	
Mon_060_131_010623	S42	Email	1.10.3.56, 1.10.3.57,1.10.4.22 & 1.10.4.23This assessment of common scoter disturbance by construction vessels within the cable corridor uses an example of a 4km by 4km buffer around a vessel. This therefore gives a number of birds displaced and number of mortalities per vessel. However, as stated in table 1.235 there are predicted to be up to 91 vessels present at any one time. Therefore, the assessment, in terms of the conservation objectives regarding both population size and distribution, should be scaled to this total vessel presence. We advise that an assessment of common scoter vessel disturbance is undertaken by using a 2.5km buffer around each vessel (Fliessbach et al., 2019) such that the total impacted area also included the size of vessel. We are content with the displacement and mortality rates applied. We advise that a restriction to vessel works during the wintering period is considered to prevent disturbance to common scoter.	We have followed the approach taken by Awel y Môr and Norfolk Boreas Offshore Windfarms by using 2.5 km buffer around each vessel x number of vessels - assuming 100% displacement and 0.5-1% mortality. With reference to disturbance and displacement, the assessment for red-throated diver and common scoter is presented in Volume 2, Chapter 5: Offshore Ornithology Environmental Statement.	No
Mon_060_132_010623	S42	Email	Table 1.237: Conclusions against the conservation objectives of the Liverpool Bay/Bae Lerpwl SPA for disturbance and displacement from airborne sound and presence of vessels and infrastructure during the construction and decommissioning phase. With regard to the conservation objective to maintain or restore the distribution of the qualifying features within the site, the effect due to vessel presence is due to be temporary, however will persist over up to four years, which in respect to the lifespan of red-throated diver and common scoter, with typical lifespans of 9 years and 6 years respectively, is a significant proportion of their lifespan. Given this and the comments above, we cannot agree with the results in this table. We advise that a restriction to vessel works during the wintering period is considered to prevent disturbance to red-throated diver.	Volume 2, Chapter 5: Offshore ornithology chapter of the Environmental Statement sets out measures adopted to reduce impacts to offshore ornithology. The Applicant has committed to no offshore export cable laying works within the Liverpool Bay SPA from 1st November to 31st March, following this feedback and discussions in the offshore ornithology EWGs.	No
Mon_060_133_010623	S42	Email	1.10.3.73Please clarify why vessel disturbance occurring in and around the export cable for red-throated diver results in "lower disturbance during the operations and maintenance phase than during the construction phase". Fewer vessels may be present, and the displacement rate remains the same, however why is the mortality rate lower? We advise that a restriction to vessel works during the wintering period is considered to prevent disturbance to red-throated diver.	Volume 2, Chapter 5: Offshore ornithology chapter of the Environmental Statement sets out measures adopted to reduce impacts to offshore ornithology. The Applicant has committed to no offshore export cable laying works within the Liverpool Bay SPA from 1st November to 31st March, following this feedback and discussions in the offshore ornithology EWGs.	Yes
Mon_060_134_010623	S42	Email	1.10.3.75 & 1.10.3.76 & 1.10.4.35This assessment of red-throated diver disturbance by operations and maintenance vessels within the cable corridor again gives a number of birds displaced and number of mortalities per vessel. Table 1.235 lists up to 2,351 operations and maintenance vessel movements (return trips) each year with up to a total of 21 operations and maintenance vessels on site at any one time. It is not mentioned how many of these will transit Liverpool Bay SPA, and how many (if any) of these vessel movements are for the maintenance of the export cable. The assessment, in terms of the conservation objectives regarding both population size and distribution, should be scaled to this total vessel presence including vessels for export cable maintenance and transiting the SPA to reach the wind farm. We advise that a restriction to vessel works during the wintering period is considered to prevent disturbance to red-throated diver.	Clarifications have been added to Volume 2, Chapter 5: Offshore ornithology chapter of the Environmental Statement since PEIR. The chapter sets out measures adopted to reduce impacts to offshore ornithology. The Applicant has committed to no offshore export cable laying works within the Liverpool Bay SPA from 1st November to 31st March, following this feedback and discussions in the offshore ornithology EWGs.	Yes
Mon_060_135_010623	S42	Email	1.10.3.86Please clarify why vessel disturbance occurring in and around the export cable for common scoter results in "lower disturbance during the operations and maintenance phase than during the construction phase". Fewer vessels may be present, and the displacement rate remains the same, however why is the mortality rate lower? We advise that a restriction to vessel works during the wintering period is considered to prevent disturbance to common scoter.	Clarifications have been added to Volume 2, Chapter 5: Offshore ornithology chapter of the Environmental Statement since PEIR. The chapter sets out measures adopted to reduce impacts to offshore ornithology. The Applicant has committed to no offshore export cable laying works within the Liverpool Bay SPA from 1st November to 31st March, following this feedback and discussions in the offshore ornithology EWGs.	Yes
Mon_060_136_010623	S42	Email	1.10.3.87,1.10.3.88 & 1.10.4.41This assessment of common scoter disturbance by operations and maintenance vessels within the cable corridor again gives a number of birds displaced and number of mortalities per vessel. Table 1.235 lists up to 2,351 operations and maintenance vessel movements (return trips) each year with up to a total of 21 operations and maintenance vessels on site at any one time. It is	Clarifications have been added to Volume 2, Chapter 5: Offshore ornithology chapter of the Environmental Statement since PEIR. The chapter sets out measures adopted to reduce impacts to offshore ornithology. The	Yes





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			not mentioned how many of these will transit Liverpool Bay SPA, and how many (if any) of these vessel movements are for the maintenance of the export cable. The assessment, in terms of the conservation objectives regarding both population size and distribution, should be scaled to this total vessel presence including vessels for export cable maintenance and transiting the SPA to reach the wind farm. We advise that a restriction to vessel works during the wintering period is considered to prevent disturbance to common scoter.	Applicant has committed to no offshore export cable laying works within the Liverpool Bay SPA from 1st November to 31st March, following this feedback and discussions in the offshore ornithology EWGs.	
Mon_060_137_010623	S42	Email	Table 1.238: Conclusions against the conservation objectives of the Liverpool Bay/Bae Lerpwl SPA for disturbance and displacement from airborne sound and presence of vessels and infrastructure during the operations and maintenance phase. &Table 1.251: Conclusions against the conservation objectives of the Liverpool Bay/Bae Lerpwl SPA for in-combination disturbance and displacement from airborne sound, and presence of vessels and infrastructure impacts during the construction phase. Given the above comments with regard to the vessel disturbance assessment during operation and maintenance, we cannot agree with the results in this table. We advise that a restriction to vessel works during the wintering period is considered to prevent disturbance to red-throated diver and common scoter.	Clarifications have been added to Volume 2, Chapter 5: Offshore ornithology chapter of the Environmental Statement since PEIR. The chapter sets out measures adopted to reduce impacts to offshore ornithology. The Applicant has committed to no offshore export cable laying works within the Liverpool Bay SPA from 1st November to 31st March, following this feedback and discussions in the offshore ornithology EWGs.	Yes
Mon_060_138_010623	S42	Email	Table 1.242: Conclusions against the conservation objectives of the Irish Sea Front SPA for changes in prey availability during the construction phase. Note that new conservation objectives for the Irish Seafront SPA have recently been published and are available here: hiips://jncc.gov.uk/our-work/irish-sea-front-spa/#conservation-adviceand should be referred to in the next iteration of this document.	Updated conservation objectives for the Irish Sea Front SPA have been considered in HRA Stage 2 ISAA Part 3 – SPA assessments.	No
Mon_060_139_010623	S42	Email	1.10.4.2It is stated that schemes other than offshore wind farms and tidal energy projects are considered to be unlikely to impact in-combination, however vessel disturbance by other activities may act in-combination, for instance vessel activities associated with aggregate activities, which should be accounted for in an in-combination assessment.	The impact of vessel movement associated with operation and maintenance for project alone and in-combination is presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_060_140_010623	S42	Email	1.10.4.8 & 1.10.4.10Given the comments made regarding Volume 6: Annex 10.5 Offshore ornithology apportioning assessment and Volume 6: Annex 10.3 Offshore ornithology non-migratory seabird collision risk assessment, we cannot agree that all relevant SPAs and features have been included here.	All SPAs with seabird features within the mean-max foraging + 1 SD of the Mona Array Area have been considered in the assessment.	No
Mon_061_001_020623	S42	Email	Thank you for consulting the RSPB over the proposal to construct Mona Offshore Wind Farm (the Application). We limit the scope of our comments to ornithology and related matters.	The Applicant notes your response.	No
Mon_061_002_020623	S42	Email	Offshore ornithology We are grateful for the opportunity to comment on the offshore ornithology aspects of the proposed offshore wind farm, as set out in the PEIR documents. Due to the parallel nature of the three PEIR consultations (Mona, Morgan and Morecambe) and resource constraints, we have not been able to review the documents provided to provide meaningful comments at this stage. We will instead provide our input on offshore ornithology matters via the expert working group in the evidence plan process. However, we wish to confirm that the main breeding seabird species of interest to the RSPB include Manx Shearwater, Northern Gannet, Black-legged Kittiwake, Guillemot and Razorbill along with non-breeding red-throated diver and common scoter. We also have concerns with breeding Lesser Black-backed Gull, despite the low frequency of occurrence during the reported survey work. This is because, with the exception of the Ribble and Alt Estuary SPA colony, the main Irish Sea breeding colonies (at Bowland Fells SPA and Morecambe Bay and Duddon Estuary SPA) require restoration to a favourable conservation status and the implications of this needs careful consideration via the Expert Working Groups.	Noted. Discussions with RSPB have been ongoing throughout the pre-application process through the EWGs.	No
Mon_061_005_020623	S42	Email	We trust our comments are of use and look forward to continuing to engage in the consenting processes of the Mona Offshore Wind Farm. The RSPB reserves the right to make further representations in relation to this matter.	The Applicant notes your response.	No
Mon_066_001_020623	S42	Email	MARKED RED - Concern - The cumulative and in-combination assessments do not factor in impacts from a number of other projects due to a lack of data. Impacts specified as 'unknown' have been treated as zero which will inevitably underestimate impacts, potentially significantly. Natural England consider this approach to be unacceptable, and hence consider it inappropriate to comment on the potential significance of cumulative or in-combination assessments presented in the PEIR submission. Rec to Resolve- Natural England propose working collaboratively with stakeholders through the EWG to generate suitable impact	included in the CEA presented in Volume 2, Chapter 5: Offshore Ornithology and the in-combination assessment in	No





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			estimates for historic projects and facilitate a comprehensive, quantitative cumulative and in-combination assessment.	with the EWG and the Applicant has provided a detailed response via a technical note.	
Mon_066_002_020623	S42	Email	MARKED ORANGE - Concern - Natural England propose working collaboratively with stakeholders through the EWG to generate suitable impact estimates for historic projects and facilitate a comprehensive, quantitative cumulative and in-combination assessment. Rec Resolve- Natural England reiterate our recommendation to carry out some scenario testing to investigate the potential impact of low ID rates and determine if spatial modelling and apportioning is appropriate. We would welcome further discussion on this issue via future EWG meetings. Further, we request that a full monthly breakdown of records relating to razorbill and guillemot is presented to facilitate scrutiny of seasonal variation in ID rates.	Monthly breakdown of total raw abundance for identified and unidentified auk/shearwater species within the Mona Offshore Ornithology Array Area study are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement.	No
Mon_066_003_020623	S42	Email	MARKED ORANGE - Concern - The generation and use of model-based abundance estimates. Rec Resolve- The submitted ES should include presentation of more detailed methods, including corrections for the apportionment of unidentified birds and availability bias and the generation of birds in flight densities for use in CRM.	Detailed methods presenting corrections factors used for availability, apportionment of species and estimate of flying birds are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement for each species.	No
Mon_066_004_020623	S42	Email	MARKED ORANGE - Concern - The approach to HRA methodology and provision of updates outwith the PEIR submission. Rec Resolve- Continue to work through the EWG to agree the approach, ensuring adequate time is given to consider outcomes in document production for project milestones.	As discussed through the evidence plan process, a 'two step' integrity test has been carried out in the ISAA. This will involve a high level initial step 1 assessment to determine those SPAs with low risk of Adverse Effect on Integrity (AEOI), and a more detailed step 2 assessment for those SPAs where there is greater risk of an AEOI. This approach is described and presented in the HRA Stage 2 ISAA- Part 3.	No
Mon_066_005_020623	S42	Email	Project Description Vol 1, Ch3, Table 3.6 - Comment - Natural England welcome the commitment to a minimum height of lowest blade tip above LAT of 34m, which will reduce collision risk mortality estimates for sensitive species.	The Applicant notes your response.	No
Mon_066_006_020623	S42	Email	Survey Data Acquisition Vol 2, Ch 10, Table 10.5 - Comment - The SNCBs recommended in the EWGs that a power analysis is undertaken to demonstrate that survey coverage is appropriate. Although the analysis of 12% of the sea surface is thought likely to be sufficient, best practice would be to conduct a power analysis to determine and evidence this. Natural England note the repeated assertion that CVs are presented in Vol 6 Annex 10.1,but it appears that only CIs are presented there. Recommendation - Add CVs to all applicable data presented in Vol 6 Annex 10.1 to demonstrate the level of precision obtained by analysing 12% of the sea surface.	A Power Analysis was conducted on baseline survey data to ensure an appropriate level of survey coverage has been achieved. The SNCBs agreed through the evidence plan process t that the survey coverage and data analysis undertaken were appropriate for establishing a baseline to be considered for EIA and HRA.	No
Mon_066_007_020623	S42	Email	Survey Data Acquisition Vol 2, Ch 10, Table 10.5 - Comment - Natural England note that the topics and issues raised at EWG3 (Nov 2022) are not detailed. We appreciate there was a relatively limited amount of time to incorporate the recommendations of that consultation in to the PEIR. However, this constraint was not unexpected. Natural England question the timing, and therefore usefulness of that consultation. Notably, substantial comments arising from our review of the PEIR may well already be progressed following that EWG, for example on the issue of ID rates for auks. Recommendation -Plan future EWGs to allow full consideration of the discussion by the project in subsequent document production and submission in order to reduce the potential for duplication of effort during stakeholder review.	The Applicant notes your response.	No
Mon_066_008_020623	S42	Email	Survey Data Acquisition Vol.2, Ch.10Table 10.9 - Comment - In addition to SPAs, the list of designated sites in Table 10.9should include all relevant Ramsar sites and SSSIs, and their qualifying features. Recommendation - Please include any relevant Ramsar sites and SSSIs (and relevant qualifying features) with connectivity to Mona.	SPA, Ramsar and SSSI sites/colonies within individual species foraging range (mean-max foraging range + SD) from the Mona Array Area and the Mona Offshore Cable Corridor are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement.	No
Mon_066_009_020623	S42	Email	Survey Data Acquisition Vol 2, Ch 10, Table 10.5 - Comment - Raw counts are only provided as summed totals Recommendation - Provide species-specific raw counts for each individual survey.	Monthly breakdown of total raw abundance within the Mona Offshore Ornithology Array Study Area is presented in Volume 6, Annex 5.1: Offshore ornithology baseline	No





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				characterisation technical report of the Environmental Statement, Appendix A.	
Mon_066_010_020623	S42	Email	Data Gaps Vol 2, Ch 10 - Comment - The cumulative and in-combination assessments do not factor in impacts from a number of other projects due to a lack of data. Impacts specified as 'unknown' have been treated as zero which will inevitably underestimate impacts, potentially significantly. Natural England consider this approach to be unacceptable, and hence consider it inappropriate to comment on the potential significance of cumulative or in-combination presented in the PEIR submission. Recommendation - Natural England propose working with the project and other stakeholders collaboratively through the EWG to generate suitable impact estimates for historic projects and facilitate comprehensive, quantitative cumulative and in-combination assessments.	The approach to the CEA presented in Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement has been discussed and agreed with the offshore ornithology EWG.	No
Mon_066_011_020623	S42	Email	Data Gaps - Comment - Natural England notes the forthcoming publication of "Densities of qualifying species within Liverpool Bay / Bae Lerpwl SPA:2015 to 2020" which will provide up to date density estimates for red-throated diver, common scoter and the waterbird assemblage within the original SPA boundary. Recommendation - The most up to date data available should be considered for the Mona offshore cable corridor, which passes through the SPA. Natural England will alert the developer as soon as we are able to share this report.	Key findings from HiDef Aerial Surveying Limited (2023) Densities of qualifying species within Liverpool Bay/ Bae Lerpwl SPA: 2015 to 2020 Natural England Commissioned Report 440, Natural England have been summarised in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement. Updated densities and population counts have been used.	No
Mon_066_012_020623	S42	Email	Data Analysis, Modelling and Reporting Vol 2, Ch 10, Table 10.5 - Comment - Natural England note that we did not advise that black-legged kittiwake was screened into the displacement assessment. Natural England currently consider the evidence base insufficient, but suggestive of a broad range of responses incorporating both displacement and attraction for this species. Recommendation - Edit table	Although black-legged kittiwake are considered to have low sensitivity to displacement, this species has been considered in the offshore ornithology assessment following agreement through the Evidence Plan Process.	No
Mon_066_013_020623	S42	Email	Data Analysis, Modelling and Reporting Vol 2, Ch 10.Table 10.8 - Comment - Unidentified guillemot/razorbill are the second most frequently recorded species group (6,247), after identified guillemot (7,425).Natural England highlight our previous comments on the issue of apportioning auks to species given the low ID rates. See our written response to Ornithology EWG03 (Our ref: DAS/UDS A000566 412777)Natural England note that there is no consideration of this issue within the PEIR documents. We retain significant concerns regarding the apportioning of auks given the low ID rates and potential for unexplained bias. Recommendation - Natural England reiterate our recommendation to carry out some scenario testing to investigate the potential impact of low ID rates and determine if spatial modelling and apportioning is appropriate. We would welcome further discussion on this issue via future EWG meetings. Further, we request that a full monthly breakdown of records relating to razorbill and guillemot is presented to facilitate scrutiny of seasonal variation in ID rates.	Updated auk ID rates the Digital Aerial Surveys (DAS) have been used to generate population estimates for auk species. The population estimates are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement. Monthly breakdown of total raw abundance for identified and unidentified auk/shearwater species within the Mona Offshore Ornithology Array Area study are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement.	
Mon_066_014_020623	S42	Email	Data Analysis, Modelling and Reporting Vol 2, Ch 10.10.10.1.5 - Comment - Cumulative displacement impacts are assessed for guillemot, razorbill, puffin, gannet. Natural England consider Manx shearwater should also be assessed. Recommendation - Carry out cumulative and in-combination assessments for Manx shearwater displacement impacts.	Cumulative and in-combination assessments are presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_066_015_020623	S42	Email	Data Analysis, Modelling and Reporting Vol 2, Ch 10.10.10.3 - Comment - Natural England agree that displacement and collision impacts should be summed for species susceptible to both. Therefore, we consider gannet should be assessed for the combined impact of displacement and collision for the project alone. Recommendation - Sum the impacts of displacement and collision on gannet and assess for the project alone.	The combined cumulative displacement and collision for northern gannet for the Mona project alone is presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_066_016_020623	S42	Email	Data Analysis, Modelling and Reporting Annex 10.1 & 10.2 Comment - Natural England note that there appears to be an inconsistency in the availability bias correction factors applied to auks. Natural England also highlight that Manx shearwater is a surface diving species and data are available detailing foraging & diving behaviour. It may also be appropriate to consider availability bias for that species. Recommendation - Clarify which correction factors have been used in calculations and ensure consistency across method descriptions (and application). Discuss the calculation and application of an availability bias correction factor for Manx shearwater at future EWG meetings.	The correction factors applied to sitting common guillemot and razorbill, were based on the proportion of time spent underwater from Thaxter et al. (2010) and were refined following the method recommended by JNCC (2013) which excludes the percentage of birds in flight from the calculations. Proportion of time spent underwater were 23.75% and 17.4%, respectively for common guillemot and razorbill. For Atlantic puffin, a proportion of time spent underwater of 14.16% was used (Spencer, 2012).	No





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				Methodology detailing how correction factors were applied to abundance estimates is presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement.	
Mon_066_017_020623	S42	Email	Data Analysis, Modelling and Reporting Annex 10.3 - Comment -Natural England agree with the approach to CRM, and the parameters used. However, we advise that all data used in the assessment process is made available as an appendix, along with all model logs, to enable full review and future utilisation by other projects. Recommendation - Present boot-strapped data in an appendix. Present sCRM log files as an appendix.	Density estimates of species screened into collision risk assessment are presented in Volume 6, Annex 5.3: Offshore ornithology collision risk modelling technical report. All bootstrapped abundance are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report. Log files are available on request in a digital format.	No
Mon_066_018_020623	S42	Email	Data Analysis, Modelling and Reporting Annex 10.1 - Comment - Although the general approach appears sound, Natural England consider there is a lack of detail relating to the methods applied throughout the MRSea modelling process and subsequent treatment of data. In particular, it is not clear: How densities of flying birds only have been calculated from MRSea for use in CRM. How mean monthly flying bird densities and CIs have been generated. How corrections for unidentified birds (i.e., apportioning) and availability bias have been applied to the MRSea estimates and CIs. Recommendation - Clarity is needed to give reassurance that modelling has been carried out appropriately. Natural England recommend that worked examples are included to fully detail the assessment process for both collision (e.g., gulls) and displacement (e.g., auks). Clarify and specify throughout the documentation where modelled and design-based data have been used.	Further detail on the methodology is presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement.	No
Mon_066_019_020623	S42	Email	Data Analysis, Modelling and Reporting Ch 10, 10.4.4.14 & Table 10.12 - Comment - Natural England are not convinced that the method used to calculate regional breeding populations is appropriate Recommendation - Natural England propose discussing the approach to calculation of regional breeding populations through the EWG to reach agreement with relevant stakeholders and ensure consistency across relevant projects.	There were potential inaccuracies associated with the approach proposed by NRW at the EWG with broad assumptions about immature populations which result in an increase in the total regional breeding population figure. As a more precautionary approach in the ES chapter, the number of immature birds present in the regional BDMPS has been estimated using the ratio of immatures per breeding adult provided in the relevant species accounts in Furness (2015). This approach assumes that all immatures associated with each breeding colony will be present within the foraging range defined for each species. The Applicant acknowledges there are also potential inaccuracies with this approach. This approach likely under-estimates the true count of juvenile and immature birds due to failing to account for juvenile and immature birds migrating across to UK colonies in the breeding season from wintering grounds outside of the UK. However as stated, will result in a more precautionary assessment in-line with Natural England guidance due to making use of a much smaller total regional breeding population against which the impacts have been assessed.	No
Mon_066_020_020623	S42	Email	Data Analysis, Modelling and Reporting Annex 10.6, Para 1.2.2.7 - Comment -PVA modelling has been undertaken excluding a 5-year 'burn in' period. Recommendation - Natural England advise following our Phase III Best practice guidance which states: 'PVAs should estimate the impacted and unimpacted populations over the lifetime of the project and include a 'burn-in' period (5 years) to allow the model to reach stability prior the projection period beginning'	PVAs have been parameterized with a 5-year burn-in period to include age structure from burn-in run period. PVAs are presented in Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report of the Environmental Statement.	No
Mon_066_021_020623	S42	Email	Methodology - Comment - There is no information on anticipated vessel movements presented in offshore ornithology documentation. Recommendation - NE advises that some indication should be given as to where construction and maintenance vessels are likely to sail from as well as the likely increase in vessels activity. As a minimum, routes through the Liverpool Bay SPA should follow best practice protocols (including adhering to existing routes wherever possible) to minimise disturbance to common scoter and	The impact of vessel movement associated with operation and maintenance for project alone and in-combination is presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No





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			red-throated diver. Subject to more information being provided, the need for seasonal restrictions may require consideration (1stNovember –31stMarch inclusive).		
Mon_066_022_020623	S42	Email	Methodology Ch 10, 10.8.4. Annex 10.3 and 10.4 - Comment - Natural England do not consider low numbers detected during baseline characterisation surveys to be adequate justification for scoping out seabird species that that may pass through the Mona site on migration from assessments (e.g., terns and skuas). Recommendation - Natural England recognise that it may not be appropriate to use SOSSMAT for these species. An alternative approach is to consider a broad migratory front, and apportion impacts to the project area. For example, see the Marine Scotland project on strategic assessment of collision risk of OWFs to migrating birds (WWT Consulting Ltd 2014) http://www.gov.scot/Resource/0046/00461026.pdf	Migratory seabirds are considered in the collision risk modelling for seabirds provided in Volume 6, Annex 5.4: Offshore ornithology migratory bird collision risk modelling technical report of the Environmental Statement.	No
Mon_066_023_020623	S42	Email	Methodology Vol 6, Ch 10.6, 1.2.2.7 - Comment -Natural England do not agree with the use of the PVA stable age structures. Recommendation - Natural England advise that proportions of adults and immatures would preferably be based on age-class information from site-specific surveys. We note the difficulties associated with ageing some species from digital aerial data and currently recommend that a precautionary approach assuming all adult-type birds are adults is adopted.	Where possible, site-specific age-classes from Digital Aerial Surveys (DAS) were used for age-class apportioning within the breeding season as advised by the offshore ornithology EWG.	No
Mon_066_024_020623	S42	Email	Methodology Vol 5, Ch 5.1, Matrix 1.9 Vol 2, Ch 10 - Comment -Natural England acknowledge that undertaking a quantitative cumulative (and in-combination) assessment is challenging as there are significant data gaps and disparities relating to historic projects. In some cases, data may not exist. In others, data will have been generated with outdated methods. However, Natural England do not agree that projects with 'unknown' impacts can be excluded from cumulative and in-combination impact totals. Further, we do not necessarily agree that it is inappropriate for projects to re-calculate (or indeed, calculate) impacts for historic projects. Recommendation - Natural England propose collaborative working with stakeholders through the EWG to generate suitable impact estimates for historic projects and facilitate a comprehensive, quantitative cumulative and in-combination assessment.	Projects where effects were not historically assessed were included in the CEA presented in Volume 2, Chapter 5: Offshore Ornithology and the in-combination assessment in the ISAA and treated as unavailable. A more detailed qualitative assessment has been added to further assess the historic offshore wind projects. This has been discussed with the EWG and the Applicant has provided a detailed response via a technical note.	No
Mon_066_025_020623	S42	Email	Methodology Vol 6, Ch 10.2, 1.2.4.3 - Comment - As discussed in EWG 3, NE advise that sabbaticals are not taken into consideration due to a lack of supporting evidence. Recommendation - Do not consider sabbaticals in impact assessment.	Sabbaticals have been included in adults impacts for the purpose of the impact assessment.	No
Mon_066_026_020623	S42	Email	Screening - Comment - As discussed through the EWGs, Natural England do not agree with the approach to LSE screening set out in the submitted HRA Screening Report. During the consultation period for the PEIR an updated HRA methodology was submitted. Natural England do not consider it appropriate or useful to comment on the documents submitted for consultation at PEIR with the knowledge that the approach will be substantially overhauled. Furthermore, Natural England do not consider it appropriate to consider documents submitted following the PEIR review, and outside of the consultation, in our review of the PEIR. Recommendation - Natural England will review the updated HRA screening methodology and provide written comments separately. We will continue to engage collaboratively with the project and other stakeholders through the EWG to ensure a mutually agreeable approach.	The updated approach to the HRA Stage 1 Screening Report has been discussed and agreed through the evidence plan process.	No
Mon_066_027_020623	S42	Email	Assessment Vol 6, A 10.5 - Comment - It is noted that apportioning has been undertaken using NatureScot methods. Natural England retain some concerns regarding the current limitations of this approach. However, an updated method is being progressed through the ORJIP AppSaS project that we hope will address these concerns. Recommendation - Monitor the progress of the AppSaS project and any updated apportioning methodologies. Continue to engage with relevant stakeholders through the EWG to agree the approach.	Apportioning presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement has been undertaken using the Nature Scot method in the absence of any other updated methodologies.	No
Mon_066_028_020623	S42	Email	Assessment Vol 6, A 10.5,1.2.4.1 - Comment - As advised through the EWG, Natural England do not consider it is appropriate to apply the stable age structures in apportioning. Recommendation - Age-class data from site specific surveys should be used wherever possible, accepting that a precautionary approach assuming all adult-type birds are adults will probably be required.	Where possible, site-specific age-classes from Digital Aerial Surveys (DAS) were used for age-class apportioning within the breeding season as advised by the Expert Working Group. Methodology is presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement.	No
Mon_066_029_020623	S42	Email	Assessment Vol 6, A 10.5,1.2.6.5 - Comment - As advised through the EWG, Natural England do not consider it is appropriate to remove sabbaticals. Recommendation - Do not remove sabbaticals during apportioning.	Sabbaticals have been included in adults impacts for the purpose of the impact assessment.	No





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Mon_066_030_020623	S42	Email	In-combination -Comment -See above comments on cumulative impact assessment regarding projects with unknown impacts.	Noted.	No
Mon_066_031_020623	S42	Email	Further Receptor Points - Comment - Natural England reiterate our advice supplied through EWG discussions regarding red-throated diver at Liverpool Bay SPA and cable laying impacts. Natural England considers this feature may already be subject to an AEOI in-combination arising from disturbance and displacement impacts. Recommendation - Cable laying operations within the Liverpool Bay SPA should avoid sensitive periods for wintering red-throated diver (and common scoter), i.e., 1stNovember-31stMarch inclusive, noting that there is also the potential for significant numbers of this designated species to be present at the site in the 'shoulder months' of October and April.	Volume 2, Chapter 5: Offshore ornithology chapter of the Environmental Statement sets out measures adopted to reduce impacts to offshore ornithology. The Applicant has committed to no offshore export cable laying works within the Liverpool Bay SPA from 1st November to 31st March, following this feedback and discussions in the offshore ornithology EWGs.	Yes
Mon_066_036_020623	S42	Email	We recommend that a Statement of Common Ground (SoCG) is started by the Applicant early within the EPP, to accurately catalogue all areas of agreement for the project and highlight any areas of disagreement. ETG consultation/agreement logs have been successfully used by other projects as the foundation for the SoCG.	The Applicant will develop Statement of Common Ground with all key stakeholders during the examination phase.	No
Mon_066_037_020623	S42	Email	Best Practice Advice for Offshore Wind Natural England has produced a series of documents to provide Environmental Assessments: Best Practice Advice for Evidence and Data Standards for offshore wind farm development in English inshore and offshore waters. The advice is provided in a series of documents which range from baseline characterisation surveys and pre-application engagement, through to expectations at application and post-consent monitoring.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_038_020623	S42	Email	The project is divided into four phases: Baseline characterisation surveys Pre-application engagement and the evidence plan process Data and evidence expectations at examination Post-consent monitoring and other environmental requirements.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_039_020623	S42	Email	The above link also provides access the Nature Conservation Considerations and Environmental Best Practice for Subsea Cables for English Inshore and UK Offshore Waters. This project provides Natural England and JNCCs joint environmental best practice advice for subsea cable projects in English inshore and UK offshore waters.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_040_020623	S42	Email	It is the expectation that developers follow our Best Practice through the application and consenting process. As such our advice and recommendations to the PEIR are framed around this advice.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_041_020623	S42	Email	If you have any issues using SharePoint Online, please contact the site owners or contact: REDACTED	The Applicant notes your response.	No
Mon_066_044_020623	S42	Email	Natural England's Structure/Framework for Attributing Risk. The comments provided within this letter and its Annexes have been colour coded using the structure/framework as specified in the risk table in Appendix I of this letter. In this letter, the coloured headings are coded based on the highest risk associated with the topic in question. Natural England would like to highlight that at this stage all comments highlighted as yellow, amber, or red need to be addressed, with the potential for these issues to become more significant if not resolved at application.	The Applicant notes your response.	No
Mon_066_045_020623	S42	Email	Impacts on the Natural Environment–Natural England's Key Concerns Generic Issues - MARKED RED BASED OFF THEIR APPENDIX Natural England highlights that for several receptors, the PEIR is based on incomplete data (offshore ornithology, marine mammals) or refers to additional data collection that is not presented or still to be carried out (physical processes, benthic ecology). Natural England cannot therefore make any conclusive judgements based on this PEIR, including the cumulative/in-combination assessments and the HRA. Accordingly, our advice focuses on the methodology used. We emphasise the need to base the submitted ES on robust datasets that meet (and where appropriate exceed) minimum standards, for example marine mammal and offshore ornithology impact assessments should be based on at least 24 monthly surveys.	The Environmental Statement has been based on robust datasets that meet/exceed minimum standards. For marine mammals and offshore ornithology assessments, two years of aerial survey data is presented and analysed (Volume 2, Chapter 4: Marine mammals chapter; Volume 2, Chapter 5: Offshore ornithology chapter). The benthic and physical processes assessments have been informed by 2022 and 2023 intertidal surveys, and 2021 and 2022 subtidal benthic surveys (Volume 2, Chapter 1: Physical processes chapter; Volume 2, Chapter 2: Benthic subtidal and intertidal ecology chapter).	No





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Mon_066_046_020623	S42	Email	We also highlight the risks associated with further data processing to validate the conclusions and having sufficient time to consult pre-application and sufficiently resolve matters prior to submission We reserve the right to change our comments and position during the ES consultation, subject to the outcome of further data analysis. Furthermore, Natural England seeks confirmation that the timetable set out for DCO submission allows for evidence standards to be met.	Noted. The Applicant confirms that the timetable set out for DCO submission allows for evidence standards to be met.	No
Mon_066_047_020623	S42	Email	Please note that Natural England defer to Natural Resources Wales as the relevant statutory consultee in some instances. This is reflected by the use of a Purple RAG rating in our advice.	The Applicant notes your response.	No
Mon_066_053_020623	S42	Email	Offshore Ornithology - MARKED RED BASED OFFTHEIR APPENDIX Natural England is concerned that the cumulative and in-combination assessments do not factor in impacts from a number of other projects due to a lack of data. Impacts specified as 'unknown' have been treated as zero which will inevitably underestimate impacts, potentially significantly. Natural England consider this approach to be unacceptable. We propose collaborative working with stakeholders through the EWG to generate suitable impact estimates for historic projects.	Projects where effects were not historically assessed were included in the CEA presented in Volume 2, Chapter 5: Offshore Ornithology and the in-combination assessment in the ISAA and treated as unavailable. A more detailed qualitative assessment has been added to further assess the historic offshore wind projects. This has been discussed with the EWG and the Applicant has provided a detailed response via a technical note.	No
Mon_066_054_020623	S42	Email	As stated above, Natural England note that only the first year of survey data has been included in the PEIR. Natural England cannot therefore make any conclusive judgements based on this PEIR and accordingly, our advice focuses on the methodology.	Noted	No
Mon_066_055_020623	S42	Email	Another key concern for offshore ornithology associated with the Mona Offshore Wind Project is the low identification rates of auks and the implications for data analysis and interpretation. Natural England reiterate our recommendation to carry out some scenario testing to investigate the potential impact of low ID rates and determine if spatial modelling and apportioning is appropriate. Further, we request that a full monthly breakdown of records relating to razorbill and guillemot is presented to facilitate scrutiny of seasonal variation in ID rates.	Updated auk ID rates the Digital Aerial Surveys (DAS) have been used to generate population estimates for auk species. The population estimates are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement. Monthly breakdown of total raw abundance for identified and unidentified auk/shearwater species within the Mona Offshore Ornithology Array Area study are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement.	
Mon_066_056_020623	S42	Email	Natural England has concerns regarding the generation and use of model-based abundance estimates. There is a need for presentation of more detailed methods, including corrections for the apportionment of unidentified birds and availability bias and the generation of birds in flight densities for use in CRM.	Detailed methods presenting corrections factors used for availability, apportionment of species and estimate of flying birds are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement for each species.	No
Mon_066_057_020623	S42	Email	Finally, Natural England has concerns with the approach to HRA methodology and provision of updates out with the PEIR submission. We suggest the project continues to work through the EWG to agree the approach.	The updated approach to HRA methodology has been approved through evidence plan process.	No
Mon_066_059_020623	S42	Email	Cumulative Impacts/In-Combination Assessments - MARKED RED BASED OFF THEIR APPENDIX The cumulative and in-combination assessments do not factor in impacts from a number of other projects due to a lack of data. For ornithological receptors, impacts specified as 'unknown' have been treated as zero which will inevitably underestimate impacts, potentially significantly. Natural England consider this approach to be unacceptable, and hence consider it inappropriate to comment on the potential significance of cumulative or in-combination presented in the PEIR submission.	Projects where effects were not historically assessed were included in the CEA presented in Volume 2, Chapter 5: Offshore Ornithology and the in-combination assessment in the ISAA and treated as unavailable. A more detailed qualitative assessment has been added to further assess the historic offshore wind projects. This has been discussed with the EWG and the Applicant has provided a detailed response via a technical note.	No
Mon_066_060_020623	S42	Email	For detailed advice please refer to the associated annexes. Please note, for the Mona Offshore Wind Project, Natural England have provided specific comments on ornithology, please refer to Annex 1.	Noted	No
Mon_069_124_010623	S42	Email	Chapter 10 Offshore Ornithology Manx breeding seabirds, Manx seabirds outside of the nesting seasons, and Manx birds that are not seabirds but may migrate through the Mona generation site, may all be shared between the Isle of Man and the Mona site, so there is a recognised shared interest in offshore	The apportionment of predicted mortalities from collisions and displacement of the Mona Offshore Wind Project to seabird colonies presented in Volume 6, Annex 5.5:	No





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			ornithology, though we are aware that the Mona site is further from the Isle of Man than Morgan, and closest to Wales, thoughmay receive birds from a number of different jurisdictions, within and outside of the UK. The Department of Environment, Food and Agriculture has been included within recent meetings of the Offshore Ornithology Expert Working Group, but note that due to timing, it has not been possible to take account of those recent comments within this PEIR but the applicant has stated that they will be accounted for within the Environmental Statement.	Offshore ornithology apportioning technical report of the Environmental Statement includes Marine Nature Reserves from the Isle of Man.	
Mon_069_125_010623	S42	Email	10.4.2.10 Site specific survey findings—Regarding the statement, 'The presence of Manx shearwater in July suggested that these birds might be associated with the Welsh colonies and thus forage within the Mona Offshore Ornithology Array Area study area' (and the same comment in the Offshore Ornithology Baseline report, 1.3.5.3) it is pointed out that one of the closest breeding colonies is the Calf of Man so a link there is also very likely and should therefore be noted. However, no significant effects were predicted for this species.	The apportionment of predicted mortalities from collisions and displacement of the Mona Offshore Wind Project to seabird colonies presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement includes Marine Nature Reserves from the Isle of Man.	No
Mon_069_126_010623	S42	Email	10.4.3 Designated Sites—SPAs have been identified but there is no account of Manx sites in this section – designated MNRs and ASSIs and key seabird sites in Manx National Heritage ownership. The TSC requests a consideration of Manx sites of importance to seabirds. See also comments regarding apportioning, and transboundary effects.	The apportionment of predicted mortalities from collisions and displacement of the Mona Offshore Wind Project to seabird colonies presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement includes Marine Nature Reserves from the Isle of Man.	No
Mon_069_127_010623	S42	Email	10.4.4 Important Ecological Features –Table 10.10–there appears to be an anomaly between this section, which scopes out great back-backed gull, and the section on collision risk, which includes it (correctly in our view). This species is of interest to the Isle of Man, as the Manx population has, for a long time, been important in terms of the numbers found here, but there has been a severe decline, which is a concern.	Greater black-backed gull has been scoped in to the assessment within the Important ecological features table and an assessment on this species undertaken within Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement. Collision risk assessment has been undertaken for greater black -backed gulls in Volume 6, Annex 5.3: Offshore Ornithology CRM Technical Report of the Environmental Statement.	No
Mon_069_128_010623	S42	Email	10.5.2.5 conservation value of ornithological receptors—the TSC questions the process of assigning value based on whether populations are connected with SPAs or not, from the perspective of a nation which has not been an EU Member and therefore has no SPAs, nor has the Isle of Man, at this time, made an assessment of European-level interest for our seabird sites. There is concern to ensure that where connections to Manx sites are concerned, that this is not taken as devaluing the level of the receptor and thereby skewing the process of assessment.	The apportionment of predicted mortalities from collisions and displacement of the Mona Offshore Wind Project to seabird colonies presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement includes Marine Nature Reserves from the Isle of Man.	No
Mon_069_129_010623	S42	Email	Effects of concern –It is noted that common guillemot displacement may be quite significant in relation to background mortality (for instance during the breeding period) and also great black-backed gull collision risk in relation ot background mortality, but that both are expected to be below 1% of background mortality but they are of more concern than others. From a Manx perspective, the great black-backed gull is of greater concern, because the guillemot, as elsewhere has a healthy status and a decent recoverability, as noted in the PEIR, whereas on the Isle of Man the great black-backed gull is in severe decline.	The apportionment of predicted mortalities from collisions and displacement of the Mona Offshore Wind Project to seabird colonies presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement includes Marine Nature Reserves from the Isle of Man.	No
Mon_069_130_010623	S42	Email	10.8.4.31 (page 49) states, 'The abundance of breeding great black-backed gull in the UK has changed relatively little between census (JNCC, 2020). The species is deemed to have a medium recoverability due to a low reproductive success and the stable trend in breeding abundance.' Reference is made to UK stability in population trend. It is pointed out that the Manx Birds of Conservation Concern shows a severe decline in the breeding population of GBB. It came out of this as having 'Medium' sensitivity. If the population comparison is regional then regional trends are more relevant than UK trends and could be referenced, rather than national. However, it is noted from the PVA that the South-West and Channel regional population (the smaller of the two regional populations assessed) is increasing and that the predicted effect merely slightly reduced the increase in population. Our concern is that there is a major difference between referenced regional trend and the published local trend on the Isle of Man (see comments under PVA, below), which relate more closely to the Mona site. Working this through, if we took a more local perception and accepted 'low recoverability, this could produce a High sensitivity (with Low magnitude), which would move it to the 'Minor or Moderate' significance of impact box (page 48).	Latest regional productivity rates from the Seabird Monitoring Programme (SMP) database have been included in Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report of the Environmental Statement.	No





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Mon_069_131_010623	S42	Email	Cumulative Effects Assessment -As has been noted at the EWG, the IoM wind farm has not been included in the cumulative assessment, as no survey details have been published to date, however the site should be kept in mind as data may be available before the Environmental Statement is completed.	The IoM offshore windfarm, known as Mooir Vannin Offshore Wind Farm, is included as a Tier 2 project in the CEA in Volume 2 Chapter 5: Offshore ornithology chapter of the Environmental Statement.	No
Mon_069_132_010623	S42	Email	10.11 Transboundary effects—it is noted that no effects are predicted. We note also, the Transboundary impacts screening (Volume 5, annex 5.2) 1.6.1.18which states, 'It is proposed that potential transboundary impacts related to offshore ornithology and their nature conservation interests are screened into the EIA process. A transboundary assessment has been completed and is included in volume 2, chapter 10: Offshore ornithology of the PEIR. Potential impacts upon European Sites with birds as a qualifying feature have been assessed within the draft HRA. It is requested that the potential impacts is not limited to SPAs, as this assumes current or prior EU member status and designation, or an equivalent assessment, but no European level assessment has been made for the Isle of Man (for potential Bern Convention Emerald Sites, equivalent to SPA). By definition, transboundary effects cannot assume that designations, or the status of assessments, are the same either side of the boundary, and therefore Isle of Man marine conservation designations, for example Marine Nature Reserves, National Nature Reserves (under the wildlife Act 1990), and other designations as appropriate, need to be accounted for, or clearly justified as to why they are not. The Isle of Man is a signatory to various international treaties and conventions, via the UK and, as such, has its own jurisdictional responsibilities.	Seabird colonies on the Isle of Man within individual species foraging range (mean-max foraging range + SD) from the Mona Array Area and the Mona Offshore Cable Corridor are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement.	No
Mon_069_133_010623	S42	Email	Volume 6, annex 10.1: Offshore ornithology baseline characterisation-1.3.1.8 states, 'Additional non-SPA colonies located within individual foraging ranges from the Mona Array Area are listed in Appendix A.' Note, no Manx sites have been included here. Note also, that there are no SPAs on the Isle of Man and there has to date been no assessment for European level interest, but the IoM is within the foraging range of some species and we look to the EIA for assurance that Manx seabird populations are not predicted to be significantly affected. The Manx data is available from the JNCC Seabird Monitoring Partnership Programme or the Manx report from Manx BirdLife.	Seabird colonies on the Isle of Man within individual species foraging range (mean-max foraging range + SD) from the Mona Array Area and the Mona Offshore Cable Corridor are presented in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement.	No
Mon_069_134_010623	S42	Email	Volume 6, annex 10.6: Offshore ornithology cumulative effects assessment population viability assessment technical report -1.3.2.4 states, 'Generation Assets and with the impacts from other cumulative wind farms would reduce the growth rate of the smallest BDMPS population (UK South-West and English Channel BDMPS) by no more than 0.410% when using the largest collision risk estimate (60.8 individuals per annum). The model also predicts a positive rate of growth for the population based on growth rate of 1.026 per annum at that level of impact, compared to 1.028 within the unimpacted population.'	Latest regional productivity rates from the Seabird Monitoring Programme (SMP) database have been included in Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report of the Environmental Statement.	No
Mon_069_135_010623	S42	Email	1.3.2.5 states, 'For the purposes of this assessment, it is assumed therefore that despite any additional mortality, the population is still expected to continue to grow and will be larger after 35 years than that what is currently recorded.'	Noted	No
Mon_069_136_010623	S42	Email	The TSC believe that this follows accepted practice with respect to great black-backed gull. There are known problems defining the regional population here but it makes a comparison with both west coast regional populations, as it lies between the two. Of concern here is that the result of the methodology is that there is a slight reduction in the positive growth of the (smaller) SW population, but the Isle of Man data shows, not a positive growth, but a very severe decline in the breeding population (breeding population reduction 78.5% in 15 years and reduction 70.6% in 30 years) which begs a question as to whether the accepted regional population comparisons provide appropriate data as background, when there are clearly very different effects occurring in areas within that population, and much of it lies far from the study site, whereas the Isle of Man is close. At the EWG, it was noted that Horsewill and Robinson had been referenced and we ask whether the latest JNCC-held SMP data can be used, which the applicant has stated they will look at (the guidance apparently just recommends a 'custom approach'). Assurances are sought that the Manx population of great black-backed gulls will not be affected significantly, noting the threat that this population is already under, on the Isle of Man.	Latest regional productivity rates from the Seabird Monitoring Programme (SMP) database have been included in Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report of the Environmental Statement. Note that it is difficult to apportion to individual colonies during the breeding season in the CEA and hence why the BDMPS population was used. Within the Mona project alone assessment during the breeding season, great black-backed gull colonies have been considered (including Manx colonies). No Manx colonies went above the 1% threshold.	No
Mon_069_137_010623	S42	Email	Volume 6, annex 10.5: Offshore ornithology apportioning assessment –It is noted that Manx sites (all non-SPA of course as we do not have European SPAs in the jurisdiction) have been taken into account, in the apportioning, though as non-SPAs they are aggregated to a single non-SPA total. For the species of most	The apportionment of predicted mortalities from collisions and displacement of the Mona Offshore Wind Project to seabird colonies presented in Volume 6, Annex 5.5:	No





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			interest to us in this discussion, the great black-backed gull, and another of local significance in regional terms, the herring gull, this is a significant proportion of the non-SPA total, but it is noted that this does not produce an expected adverse effect for that category (non-SPA).	Offshore ornithology apportioning technical report of the Environmental Statement includes Marine Nature Reserves from the Isle of Man.	
Mon_069_316_010623	S42	Email	Offshore Ornithology1.6.1.18 It is proposed that potential transboundary impacts related to offshore ornithology and their nature conservation interests are screened into the EIA process. A transboundary assessment has been completed and is included in volume 2, chapter 10: Offshore ornithology of the PEIR. Potential impacts upon European Sites with birds as a qualifying feature have been assessed within the draft HRA.NOTED, but the Isle of Man Government requests that the potential impacts IS NOT LIMITED to European Sites, as this assumes current or prior EU member status and designation. By definition, transboundary effects cannot assume that designations are the same either side of the boundary, and therefore Isle of Man marine conservation designations, for example Marine Nature Reserves, National Nature Reserves (under the wildlife Act 1990), and other designations as appropriate, need to be treated as equivalent, or clearly justified as to why they are not. The Isle of Man is a signatory to various international treaties and conventions, via the UK and, as such, has its own jurisdictional responsibilities. This comment is also relevant to those made in respect of the Offshore Ornithology chapters.	The apportionment of predicted mortalities from collisions and displacement of the Mona Offshore Wind Project to seabird colonies presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement includes Marine Nature Reserves from the Isle of Man.	No
Mon_069_323_010623	S42	Email	·Protection of sensitive coastal areas such as Dhoon, Laxey and Maughold headlands which are noted for their nesting sea bird communities.	Comment noted and the Applicant confirms that all Isle of Man Marine Nature Reserves are located outwith the zone of influence of the Mona Offshore Wind Project.	No
Mon_069_326_010623	S42	Email	·Limiting disturbance of marine species and coastal sea birds during any boat trips from the Island to the arrays, as and where necessary.	Disturbance will be limited using appropriate designed-in measures, including an Offshore Environmental Management Plan (EMP). There is no potential for disturbance of coastal birds from the Isle of Man as vessel activity associated with construction, operation and maintenance is likely to be undertaken from UK ports.	No
Mon_071_022_020623	S42	Email	Cumulative and in-combination effects of projects It is important to ensure that all environmental impacts of your project are properly and fully assessed including any potential cumulative or in combination effects with West of Duddon Sands. As an example, the impact upon Whooper Swan has been the subject of studies in relation to West of Duddon Sands and these studies have shown Whooper Swan transits through or close to your proposed development. Whooper Swan have so far been omitted in your offshore ornithology chapter.	Whopper swan have been included in migratory birds collision risk modelling presented in Volume 6, Annex 5.4: Offshore ornithology migratory bird collision risk modelling technical report of the Environmental Statement.	No
Mon_071_023_020623	S42	Email	We would be happy to discuss with you the Whooper Swan studies, and your approach to potential cumulative or in combination effects, to help ensure a compliant assessment.	The Applicant notes your response.	No
Mon_071_026_020623	S42	Email	Wintering populations of pink-footed geese	The Applicant notes your response.	No
Mon_071_027_020623	S42	Email	Herring gull and lesser black-backed gull relating to the Alt, Morecambe Bay and Martin Mere SPAs	The Applicant notes your response.	No
Mon_071_028_020623	S42	Email	Breeding populations of the breeding populations of Max shearwater at the Rum, Skokholm and Skomer SPAs.	The Applicant notes your response.	No
Mon_071_029_020623	S42	Email	The PIER is also lacking with regard to the proposed approach when dealing with ongoing cumulative environmental monitoring and survey programmes, and MWL would welcome the opportunity to receive more information on this.	The Applicant has included data from ongoing environmental monitoring and survey programmes where available in Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement. No future monitoring is considered for the Mona Offshore Wind Project given the level of certainty around the potential effects.	No
Mon_088_025_040623	S42	Email	The ECC will pass though the Liverpool Bay SPA; specific concerns arsing from which the WTW will defer to responses made by the Royal Society for the Protection of Birds (RSPB), and the Menai Strait and Conway Bay SAC, as well as the aforementioned SSSI. These designated sites reflect the biodiversity importance of the area's intertidal sands, reefs and sandbanks. The proposed ECC encroaches on the sandbank feature known as Constable Bank which the developer acknowledges. The soft sediments of	Comment noted and the Benthic subtidal and intertidal ecology chapter of the Environmental Statement includes a full assessment of the impact on the benthic habitats in Constable Bank and the Menai Strait and Conway Bay SAC, although noting that none of designated features of the SAC	



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			this area are breeding and spawning sites for several commercial fish species, including Atlantic Herring Clupea harengus, and other identified species of principle importance. The decline of fish recruitment and collapse of stocks in the Irish Sea is contributed to by the increasing pressure which is being applied to nursery grounds of which Constable Bank is an example. Further industrialisation of this area may breach a threshold beyond which the disturbance cannot be accommodated by the environment.	are present within the small area of overlap with the Mona Offshore Cable Corridor (as determined by the site-specific surveys) and so will not be directly impacted. The potential effects on fish species and their habitats have been assessed in full in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement. Soft sediments are not typically used by herring for spawning. Relevant fish spawning and nursery grounds are characterised and assessed within Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement.	
Mon_112_001_010623	S47	FREEPOST	2. what effect would offshore windfarms have on migratory birds and marine life? More research needed!	Migratory birds are considered in the collision risk modelling for seabirds provided in Volume 6, Annex 5.4: Offshore ornithology migratory bird collision risk modelling technical report of the Environmental Statement.	No
Mon_123_004_100723	S42	Email	In the past bird strikes were thought to be a problem with wind turbines, is this not now the case?	A full assessment of the impacts of the Mona Offshore Wind Project on birds is presented in Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement and Volume 3, Chapter 4: Onshore and intertidal ecology of the Environmental Statement.	No
Mon_183_001_110523	S47	Consult Online	Limitations on offshore activity in this area during certain months due to birds mating season.	Impacts on ornithology have been assessed and are presented in Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement and Volume 3, Chapter 4: Onshore and intertidal ecology of the Environmental Statement. These impacts, including the increased impact during mating seasons, have been discussed with key stakeholders via the Evidence Working Groups throughout the application process. Commitments have been made by the Applicant detailed in the offshore ornithology chapter to reduce impacts to birds.	No
Mon_194_009_030623	S47	Email	Whilst I am referring to the effects on wildlife what studies have been carried out with regard to the migration of 10,000's of pink footed geese from Iceland in September each year. It is well known they settle on the shores of this particular region. At Marten Mere as an example. They find food during the winter months here and only return to Iceland in March. How many 1000's are going to be chopped down by these hideous mills of death. I would like to know what studies have been carried out. What measures are there to avert the death of the wildlife such as the pink footed geese. Green is not a nice colour when combined with the colour of blood.	The migration lines for pink footed geese have been checked and they do not overlap with the location of the Mona Offshore Wind Project therefore there is no potential for significnat impact on this species. A full assessment of collision risk between birds and the wind turbines has been undertaken in Volume 6, Annex 5.3: Offshore Ornithology CRM Technical Report of the Environmental Statement and Volume 6, Annex 5.4: Offshore Ornithology Migratory CRM Technical Report of the Environmental Statement.	No
Mon_205_015_020623	S42	Email	Cumulative and in-combination effects of projects It is important to ensure that all environmental impacts of your project are properly and fully assessed including any potential cumulative or in combination effects with Burbo Bank. As an example, the impact upon Whooper Swan has been the subject of studies in relation to Burbo Bank and these studies have shown Whooper Swan transits through or close to your proposed development. Whooper Swan have so far been omitted in your offshore ornithology chapter. We would be happy to discuss with you the Whooper Swan studies, and your approach to potential cumulative or in combination effects generally, in order to help ensure a compliant assessment.	The Burbo Bank offshore wind farm has been considered in the cumulative screening for each topic. The outcomes of topic specific cumulative screening are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement. Project alone and cumulative collision assessment of Whopper swan are included in Volume 2, chapter 5: Offshore ornithology of the Environmental Statement.	No
Mon_207_012_020623	S42	Email	Cumulative and in-combination effects of projects It is important to ensure that all environmental impacts of your project are properly and fully assessed including any potential cumulative or in combination effects with Burbo Bank Extension. As an example, the impact upon Whooper Swan has been the subject of studies in relation to Burbo Bank Extension and	Burbo Extension been considered in the cumulative screening for each topic. The outcomes of topic specific cumulative screening are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			these studies have shown Whooper Swan transits through or close to your proposed development. Whooper Swan have so far been omitted in your offshore ornithology chapter. We would be happy to discuss with you the Whooper Swan studies, and your approach to potential cumulative or in combination effects generally, in order to help ensure a compliant assessment.	Statement. Project alone and cumulative collision assessment of Whopper swan are included in Volume 2, chapter 5: Offshore ornithology of the Environmental Statement.	



D.25.12 Commercial fisheries table of responses



Table D.25. 12: Commercial fisheries table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_051_013_310523	S42	Email	Volume 2, Chapter 11: Commercial Fisheries-Minor Comments Due to fishing policies, many fishing vessels will be excluded from fishing within the windfarm site, even if it is deemed acceptable by the operator. The MMO recommends this be taken into account when considerations are made for the Fisheries Liaison and Coexistence Plan and justifiable disturbance payments.	A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application.	Yes
Mon_051_014_310523	S42	Email	Commercial fishing activity should be considered in conjunction with the cumulative effects on commercial shipping routes as spatial squeeze will bring higher likelihood of cross industry conflict in terms of access and potential gear conflicts in areas surrounding the windfarm site. Gear conflicts between differing types of fishing vessels may also increase, due to fishing grounds being diminished by windfarm projects and associated diverted commercial traffic.	These potential cumulative effects are considered within the cumulative effects assessment of the commercial fisheries chapter in the Environmental Statement.	Yes
Mon_056_001_010623	S47	Email	West Coast Sea Products Ltd along with the SWFPA and SFF at the earlier consultation stage provided full information on where our fishing vessels operate within the Mona lease area to target our primary species Queen Scallops and also King Scallops. This was communicated via Teams meetings and the face-to-face meeting in Kirkcudbright in 2022. Just prior to Christmas2022 the developer provided a solution to enable continuity of the Queen Scallop fishery within Mona and enable coexistence between renewables and dredging for Queen Scallops and King Scallops. This provided some degree of reassurance that the developer was taking coexistence seriously as well as a north to south inter cable array layout adjacent to the typical towing direction with the tides in this area of the Irish Sea.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a scallop mitigation zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of inter array cables in a north to south alignment, as far as possible to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	Yes
Mon_056_002_010623	S47	Email	With regards to Mona our thoughts are still of the same understanding following this meeting and that the developer honours a plan of coexistence with the Queen Scallop fishery—i.e. the 5-6kmwide corridor with limited cable crossings through the middle of the lease area, i.e. as per Figure 1.21of Volume 6, annex 8.1: Fish and shellfish ecology technical report. We trust at the next stage that the developer shall hold discussions and engagement regarding micro-siting of turbines where in close proximity to where we fish. Provided below is where we concentrated our effort within Mona 2022-23 season in line with the latest survey area we have for Mona. The fishing effort is no different to what has been provided to the developer so to date at the 2022stakeholder engagement; although most of our fishing took place typically within a 5-10km box as shown below in yellow VMS dots and limited the northern extents within the lease area where historically catches rates are highest. The green VMS dots show King Scallop VMS activity for 2022-23 season in this area.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a scallop mitigation zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of inter array cables in a north to south alignment, as far as possible to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with	Yes



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_056_003_010623	S47	Email	We have the following comments to make regarding specific offshore features of the Mona windfarm project which would enable our operations to potentially coexist: -	The Applicant notes your response.	No
Mon_056_004_010623	S47	Email	We would prefer as much development of turbines and inter array cables away from where we fish as per the above map showing VMS activity. Positioning of turbines on top of specific tows or running a cable through a tow would be seen as a missed opportunity and irreversible needless loss when it may be a case of running the cable of fixing a turbine only a small distance away. Again we would welcome the same continued involvement with the developer in the next stage and particularly a corridor through the middle of the development north to south where the Queen Scallop ground is commercially fished	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a scallop mitigation zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of inter array cables in a north to south alignment, as far as possible to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	Yes
Mon_056_005_010623	S47	Email	Inter cable arrays —as much north-south routing as possible to enable north-south towing	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to provide an update to stakeholders on the Mona array layout principles, this included the commitment to positioning inter array cables away from tows and in a north to south alignment, as far as possible, to facilitate co-existence. This is detailed within the Mona Layout Principles Statement within the Environmental Statement. The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_056_006_010623	S47	Email	We would encourage that a tightly packed turbine boundary is employed in the project design and the largest available fixed turbines are used which may be 18-20mwtoreduce the number of turbines needed.(a) the perimeter is not of too much interest to us and (b) would reduce the no. turbines required inside and enable more room for the fishing vessels to move. Dogger Bank B for instance comprises of 1 mile distance perimeter turbines and inside the turbines are some 2-3miles apart. A 1mile distanced boundary would enable safe	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a scallop mitigation zone in key	Yes



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			steaming access for the fishing vessels to and from the fishing grounds- that fall within Mona.2mile distancing of turbines within along with a dedicated avoidance of the key Queen Scallop fishing grounds(yellow VMS dots) as indicated in the Figure above would provide greater confidence of continuity of our industry.	scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of inter array cables in a north to south alignment, as far as possible to help facilitate co-existence of commercial fisheries activity within the Mona Array Area.	
				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_056_007_010623	S47	Email	Cable burial. The consultation documents inform that the developer is wishing toachieve1m burial which eliminates potential snagging with fishing gear. However we have concerns that the developer may use rock burial or mattress where appropriate, i.e. when crossing points with other existing cables We would not be overly concerned where this does not affect our fishing patterns, e.g. perimeter or to the east or west, however would be detrimental to the sandy gravelly Queen Scallop beds. Scallop vessels have also paid witness to this with recently completed projects such as Moray east where rock dumping has been excessive. We would urge that as per the Figure provided in this response above that cable burial closely ties in with the surrounding gravelly substrate sea bed like for like.	Cable protection will only be used where sufficient trenching depths cannot be achieved. There is a commitment not to place any cable protection in Constable Bank (an Annex 1 habitat outside of a designated site), to minimize cable protection within the Menai Straights and Conwy Bay SAC, and to use trenchless techniques at the landfall so no cable installation will be required in the intertidal area above seabed level. In nearshore areas the use of cable protection will be minimised. A Cable Specification and Installation Plan will be produced which will outline measures such as appropriate cable trenching depths to minimise cable exposure and stranded assets and will be secured through the deemed marine licence and the standalone marine licence. Further detail on cable protection measures can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement and details on cable protection can be found in Volume 1, Chapter 3: Project description.	Yes
Mon_056_008_010623	S47	Email	Access to fishing during construction. The consultation documents outline that a 500m exclusion zone around works maybe operated up to 4 years. During construction of the project the greatest risk to our business is no access to fish as a result of the proposal for a 500m clearance of construction activities associated with turbine installation and inter-array cables. We concentrate 75% of our annual effort approx. within specific small areas of the Mona and Morgan windfarm areas therefore our fishing and processing business would be significantly impacted. We would encourage that the project adopts a phased approach, this may enable a degree of access to continue. If a corridor is to be provided in line with the Queen Scallop fishery as discussed in earlier consultation then we would regard that construction of the project would have a reduced impact on our operations.	During construction of the Mona Offshore Wind Project, rather than complete closure of the Offshore Development Areas, it is proposed that temporary 500m safety zones will be present around wind turbines and OSPs where works are underway. It is proposed that rolling advisory exclusion zones of 500m will also be present around vessels installing inter-array cables, interconnector cables and subtidal export cables.	Yes
				The loss or restricted access to fishing grounds created by such exclusion zones will be gradual as the presence of infrastructure increases. Temporary restrictions to fishing activity and/or anchoring, will also be required in areas where full cable burial to target depth has not yet been achieved and/or surface-laid cable exists (prior to cover by external cable protection). In such areas of temporarily shallow-buried/surface-laid cable, the restricted areas will be monitored by Guard Vessels. The loss or restricted	



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				access to fishing grounds is assessed within Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement.	
				A Cable Specification and Installation Plan will be produced which will outline measures such as appropriate cable trenching depths to minimise cable exposure and stranded assets and will be secured through the deemed marine licence and the standalone marine licence. Further detail on cable protection measures can be found in Volume 2, Chapter 1: Physical processes of the Environmental Statement and details on cable protection can be found in Volume 1, Chapter 3: Project description.	
Mon_056_009_010623	S47	Email	Fish and shellfish ecology (see Chapter 8 of our PEIR)Review of Volume 2, chapter 8: Fish and shellfish ecology does not provide much comfort with some of the statements and assessment of impacts made in such as section 8.8.3.53, 8.8.3.57, 8.8.5.1 and 8.8.5.13. We do not agree with the assessment and often downplays and insinuates that only a small proportion of the Queen Scallop habitat is situated within Mona, i.e. Section 8.8.5.13 -"Long-term loss of habitat directly around the cables and wind turbines represent only a very small proportion of habitat within the fish and shellfish ecology study area, and so are unlikely to cause significant impacts on the wider scallop populations."	The magnitude of impact and sensitivity of queen scallop to long term habitat loss has been reviewed and updated in section 3.9.5.15 Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement and within Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement. This has considered additional evidence relating to impacts to scallops since PEIR drafting and project design envelope refinements which have reduced many of the maximum design scenarios with respect to seabed disturbance.	Yes
Mon_056_010_010623	S47	Email	Following construction we are anxious and uncertain whether Queen Scallops shall still wish to spawn and gather in vast dense numbers like we see at the present on the sandy gravelly ground. The fact is that the report is not fit for purpose in its assertive statements and assessments on Queen Scallop ecology as no windfarms have ever been constructed on Queen Scallop habitats to date, particularly with Mona and Morgan projects which will be situated on the most prominent and productive strip of Queen Scallop ground in Europe.	Further literature sources have been reviewed and included in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement where available to support the evidence base defining the sensitivity of queen scallop. The assessment parameters have reviewed, and relevant measure have been considered.	Yes
Mon_056_011_010623	S47	Email	We are in the infancy of understanding the impact of wind turbines on shellfish habitats. We may find ourselves in a situation where we can operate with sufficient room between turbines, however the important Queen Scallop beds may be lost for us in the future	Further literature sources have been reviewed and included in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement where available to support the evidence base defining the sensitivity of queen scallop. The assessment parameters have reviewed, and relevant measure have been considered.	Yes
Mon_056_012_010623	S47	Email	Commercial fisheries (see Chapter 11 of our PEIR) The commercial fisheries chapter provides mention to the Queen Scallop fishing grounds following information provided by myself last year in face to face meetings, via online virtual meetings and information submitted by email. We are in disagreement with several impact assessments made on "Scallop vessels –Scottish west coast" which we regard as ourselves as a receptor in the report. The impact during construction and operation on the Queen scallop commercial fishery is considered as negligible—moderate in the report throughout which we do not agree within general. If the development enables a corridor of fishing, along with situating turbines and cables where our fishing vessels do not tow gear and situated in a north-south direction then we would regard that there would be a more minimal impact. However worse case if there is no desire by the developer for coexistence with our operations and, then there is the potential for us being omitted from the fishery entirely in which case our business would cease with our Queen Scallop fishing, processing and supply chain.	measures to incorporate a scallop mitigation zone in key	Yes
				as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed	



MONA OFFSHORE WIND PROJECT					
Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_056_013_010623	S47	Email	We generally do not agree with the statements made in the report whereby "Scallop vessels –Scottish west coast"are regarded as spatially adaptive, nor does the report acknowledge the spatial squeeze crisis in fishing access at present or at least acknowledge the cumulative effects of potentially losing access to prime Queen Scallop grounds within Morgan. The assessment in this regard is invalid in considering the cumulative losses.	Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement has been updated to reflect this. The sensitivity description has been amended to reflect the limited spatial adaptability for this receptor group.	Yes
				Cumulative effects are considered within the cumulative effects assessment section of Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement. This section considers the potential effects associated with spatial squeeze when assessing the Mona Offshore Wind Project cumulatively with other relevant plans and projects.	
Mon_056_014_010623	S47	Email	Do you have comments on how the project could support and work with local, regional and national communities and the economy? Should the development proceed without any coexistence concepts such as space to fish as discussed at consultation meetings or a north-south corridor leaving the Queen Scallop ground free of development, then there shall be no community benefits to our community of Kirkcudbright within Dumfries and Galloway who have been relying on the fishing ground with Mona for over 50 years.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan.	Yes
				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_056_015_010623	S47	Email	The only recommendation of how this project could support and favour our local community, the 130 employees and fishermen we employ and other businesses which feed off of us, is to follow the design recommendations we have provided in this report in addition to our consultation responses last year and meetings to date. Our consultation to date has been reasonably proactive and we wish for this to continue as the project progresses.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a scallop mitigation zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of inter array cables in a north to south alignment, as far as possible to help facilitate co-existence of commercial fisheries activity within the Mona Array Area.	No



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				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_056_016_010623	S47	Email	4. Do you have any comments / feedback on how we have understood the technical and environmental constraints of the areas offered to us by the Crown Estate as part of its leasing process? This work informed our decision to locate Mona Offshore Wind Project at the proposed wind farm site. The constraints which were analysed and considered included water depths, wind capacity, wave height, seabed conditions, and the location of possible onshore connection and marine port facilities (among other things). See Volume 1 of our PEIR, Introductory Chapters, chapter 3: Project Description. It is disappointing that little regard has been given to the fishing industry by the Crown estate in the leasing process, particularly the Scallop industry, in the selection of the Mona site. If the development was located some 6-7miles east for instance the proposal would still be located in an area of the Irish Sea with sufficient wind, and could have easily avoided our fishing operations and not threaten continuity of our proud traditions.	Comments regarding the Crown Estates recognition of commercial fisheries activity, as much as a potential constraint on site selection as other parameters such as water depth; wind capacity and seabed conditions, are noted. However, it has been an important factor considered by bp/EnBW to inform the site selection of the array area, and associated design commitments. Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increased the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measure are set out in the Outline fisheries liaison and Coexistence Plan.	Yes
Mon_062_001_020623	S47	Email	This response to the Mona Consultation is presented by the Scottish Fishermen's Federation on behalf of the 450 plus fishing vessels in membership of its constituent associations, the Anglo Scottish Fishermen's Association, Fife Fishermen's Association. Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association.	The Applicant notes your response.	No
Mon_062_002_020623	S47	Email	West Coast Sea Products Ltd along with the SWFPA and SFF at the earlier consultation stage provided full information on where the fishing vessels operate within the Mona lease area to target the primary species Queen Scallops and King Scallops. This was communicated via Teams meetings and the face-to-face meeting in Kirkcudbright in 2022. Just prior to Christmas 2022 the developer provided a solution to enable continuity of the Queen Scallop fishery within Mona and enable coexistence between renewables and dredging for Queen Scallops and King Scallops. This provided some degree of reassurance that the developer was taking coexistence seriously as well as a North to South inter cable array layout adjacent to the typical towing direction with the tides in this area of the Irish Sea.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increased the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measure are set out in the Outline fisheries liaison and Coexistence Plan.	Yes



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_062_003_020623	S47	Email	With regards to Mona the SFF are still of the same understanding following this meeting and that the developer honours a plan of coexistence with the Queen Scallop fishery –i.e, the 5-6km wide corridor with limited cable crossings through the middle of the lease area, i.e. as per Figure 1.21 of Volume 6, annex 8.1: Fish and shellfish ecology technical report. We trust at the next stage that the developer shall hold discussions and engagement regarding micro-siting of turbines where in close proximity to where fishing activity takes place. Provided below is where SFF members concentrate their efforts within Mona 2022-23 season in line with the latest survey area we have for Mona.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan.	Yes
				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_062_004_020623	S47	Email	The fishing effort is no different to what has been provided to the developer to date at the 2022 stakeholder engagement, although most of our fishing took place typically within a 5-10km box as shown below in yellow VMS dots. The green VMS dots show King Scallop VMS activity for 2022-23 season in this area.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence	Yes



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				Plan.	
				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_062_005_020623	S47	Email	Regarding specific offshore elements of the Mona windfarm project: The SFF would prefer as much development of turbines and inter array cables away from where our members fish as per the above map showing VMS activity. Positioning of turbines on top of specific tows or running a cable through a tow would be seen as a missed opportunity and irreversible needless loss when it may be a case of running the cable of fixing a turbine only a small distance away. Again, the SFF would welcome the same continued involvement with the developer in the next stage	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan.	Yes
				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_062_006_020623	S47	Email	Inter cable arrays –as much north-south routing as possible to enable north-south towing.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are	Yes



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				set out in the Outline fisheries liaison and Coexistence Plan. The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_062_007_020623	S47	Email	The SFF would encourage that a tightly packed turbine boundary is employed in the project design and the largest available fixed turbines are used which may be 18-20Mw to reduce the number of turbines needed. (a) the perimeter is not of too much interest to our member vessels(b) would reduce the no. turbines required inside the array and enable more room for the fishing vessels to carry out their activities safely. Dogger Bank B for instance comprises of 1 mile distance perimeter turbines and inside the turbines are some 2-3miles apart. A 1mile distanced boundary would enable safe steaming access for the fishing vessels to and from the fishing grounds that fall within Mona. 2mile distancing of turbines within along with a dedicated avoidance of the key Queen Scallop fishing grounds (yellow VMS dots) as indicated in the Figure above would provide greater confidence of continuity of our members.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan.	Yes
				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_062_008_020623	S47	Email	Cable burial. The consultation documents inform that the developer is wishing to achieve 1m burial which eliminates potential snagging with fishing gear. However, we have concerns that the developer may use rock protection or mattress where appropriate, i.e. when crossing points with other existing cables. We would not be overly concerned where this does not affect our members fishing patterns, e.g. perimeter or to the East or West, however would be detrimental to the sandy gravelly Queen Scallop beds. Scallop vessels have also paid witness to this with recently completed projects such as Moray East where rock protection has been excessive. We would urge that as per the Figure provided in this response above that cable burial closely ties in with the surrounding gravelly substrate seabed like for like.	Cable protection will be designed to minimise snagging hazards as far as possible. A cable burial plan, which details target minimum cable burial depth, cable protection and monitoring of inter-array and interconnector cables will be prepared by the Applicant. The cable burial plan will be secured through a condition in the marine licence."	Yes
Mon_062_009_020623	S47	Email	Access to fishing during construction. The consultation documents outline that a 500m exclusion zone around works may be operated up to 4 years. During construction of the project the greatest risk to our members business is no access to fish as a result of the proposal for a 500m clearance of construction activities associated with turbine installation and inter-array cables. SFF members concentrate 75% of their annual effort	During construction of the Mona Offshore Wind Project, rather than complete closure of the Offshore Development Areas, it is proposed that temporary 500m safety zones will be present around wind turbines and OSPs where works	Yes



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			approx. within specific small areas of the Mona and Morgan windfarm areas therefore their fishing and processing business would be significantly impacted. The SFF would therefore encourage that the project adopts a phased approach, this may enable a degree of access to continue. If a corridor is to be provided in line with the Queen Scallop fishery as discussed in earlier consultation, then we would regard that construction of the	are underway. It is proposed that rolling advisory exclusion zones of 500m will also be present around vessels installing inter-array cables, interconnector cables and subtidal export cables.	
			project would have a reduced impact on our operations.	The loss or restricted access to fishing grounds created by such exclusion zones will be gradual as the presence of infrastructure increases. Temporary restrictions to fishing activity and/or anchoring, will also be required in areas where full cable burial to target depth has not yet been achieved and/or surface-laid cable exists (prior to cover by external cable protection). In such areas of temporarily shallow-buried/surface-laid cable, the restricted areas will be monitored by Guard Vessels.	
Mon_062_010_020623	S47	Email	1.4 Fish and shellfish ecology (see Chapter 8 of our PEIR) Review of Volume 2, chapter 8: Fish and shellfish ecology does not provide much comfort with some of the statements and assessment of impacts made in such as section 8.8.3.53, 8.8.3.57, 8.8.5.1 and 8.8.5.13. The SFF do not agree with the assessment and often downplays and insinuates that only a small proportion of the Queen Scallop habitat is situated within Mona.	The magnitude of impact and sensitivity of queen scallop to long term habitat loss has been reviewed and updated in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_062_011_020623	S47	Email	Section 8.8.5.13 -"Long-term loss of habitat directly around the cables and wind turbines represent only a very small proportion of habitat within the fish and shellfish ecology study area, and so are unlikely to cause significant impacts on the wider scallop populations." Following construction, the SFF are anxious and uncertain whether Queen Scallops shall still wish to spawn and gather in vast dense numbers like we see at the present on the ground. The fact is that the report is not fit for purpose in its assertive statements and assessments on Queen Scallop ecology as no windfarms have ever been constructed on Queen Scallop habitats to date, particularly with Mona and Morgan projects which will be situated on the most prominent and productive strip of Queen Scallop ground in Europe.	Further literature sources have been reviewed and included in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement where available to support the evidence base defining the sensitivity of queen scallop. The assessment parameters have reviewed, and relevant measures have been considered within Volume 2, chapter 3: Fish and shellfish ecology and Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement.	Yes
Mon_062_012_020623	S47	Email	We are in the infancy of understanding the impact of wind turbines on shellfish habitats, therefore we may find ourselves in a situation where our members can operate with sufficient room between turbines, however the important Queen Scallop beds may be lost in the future.	Further literature sources have been reviewed and included in Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement where available to support the evidence base defining the sensitivity of queen scallop. The assessment parameters have reviewed, and relevant measures have been considered within Volume 2, chapter 3: Fish and shellfish ecology and Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement.	
Mon_062_013_020623	S47	Email	1.7 Commercial fisheries (see Chapter 11 of our PEIR) The commercial fisheries chapter provides mention to the Queen Scallop fishing grounds following information provided by Stuart King (West Coast Sea Products Ltd)last year in face to face meetings, via online virtual meetings and information submitted by email.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan.	Yes
				The Applicant is working to facilitate co-existence with	



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				existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_062_014_020623	S47	Email	The SFF disagree with several impact assessments made on "Scallop vessels –Scottish West Coast" which we regard our members as a receptor in the report. The impact during construction and operation on the Queen scallop commercial fishery is considered as negligible –moderate in the report throughout which we do not agree. If the development enables a corridor of fishing, along with situating turbines and cables where our member vessels do not tow gear and situated in a North-South direction then we would regard that there would be more than a minimal impact.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan.	Yes
				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_062_015_020623	S47	Email	However, worst case if there is no desire by the developer for coexistence with fishing operations then there is the potential for the scallop fishery being omitted entirely in which case fishers businesses would cease with their Queen Scallop fishing, processing, and supply chain.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan.	Yes





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				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_062_016_020623	S47	Email	The SFF do not agree with the statements made in the report whereby "Scallop vessels –Scottish West Coast" are regarded as spatially adaptive, nor does the report acknowledge the spatial squeeze crisis in fishing access at present or at least acknowledge the cumulative effects of potentially losing access to prime Queen Scallop grounds within Morgan. The SFF strongly opposes the assessment in this regard as invalid in considering the cumulative losses.	The commercial fisheries chapter has been updated to reflect this. The sensitivity description has been amended to reflect the limited spatial adaptability for this receptor group. Cumulative effects are considered within the cumulative effects assessment section of the commercial fisheries chapter. This section considers the potential effects associated with spatial squeeze when assessing the Mona Offshore Wind Project cumulatively with other relevant plans and projects.	Yes
Mon_068_001_010623	S47	Email	The South Western Fish Producer Organisation Ltd (SWFPO)is a professional, officially recognised, membership body for commercial fishermen across the South of England and beyond, as far as NE and NW of Scotland. We support a highly productive catching sector, consisting of 48vessels employing around 180 fishermen from the UK and abroad. 4of these vessels are owned and operated by West Coast Sea Products Ltd, who operate all/ part of their time in the Irish Sea, targeting King and Queen scallops. Our role is no longer focussed solely on the management of fishing opportunities, but to support a catching sector committed to the sustainable management of fish stocks in the waters around the UK and adjacent EU. Across everything we do, our aim is to secure a profitable, sustainable and thriving future for our fishermen, our fisheries and our oceans.	Noted, see responses below.	No
Mon_068_002_010623	S47	Email	1.Do you have any comments / feedback on the offshore elements of the Mona Offshore Wind Project generally? West Coast Sea Products Ltd, who are members of SWFPO provided full information on where their commercial fishing vessels operated within the Mona lease area targeting King and Queen scallops, during the earlier consultation stage. This was communicated via Teams meetings and a face-to-face meeting held in Kirkcudbright in 2022. Just prior to Christmas 2022 the developer provided a solution to enable continuity of the Queen Scallop fishery within Mona and enable coexistence between renewables and dredging for Queen Scallops and King Scallops. This provided some degree of reassurance that the developer was taking coexistence seriously as well as a north to south inter cable array layout adjacent to the typical towing direction with the tides in this area of the Irish Sea.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan.	Yes
				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with	



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				the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_068_003_010623	S47	Email	Their understanding following this meeting was that the developer would honour the plan of coexistence with the Queen Scallop fishery –i.e. the 5-6km wide corridor with limited cable crossings through the middle of the lease area, as per Figure 1.21 of Volume 6, annex 8.1: Fish and shellfish ecology technical report. We trust at the next stage that the developer shall hold discussions and engagement regarding micro-siting of turbines in close proximity to where these vessels fish. Provided below is where our members concentrate their fishing effort within the latest survey area known to them as the Mona site, during the 2022-23 season. Fishing effort is no different to what has previously been provided to the developer back in 2022, although most of the fishing took place typically within a 5-10km box as shown below in yellow VMS dots and was limited the northern extents within the lease area where historically catches rates are highest. The green VMS dots show King Scallop VMS activity for 2022-23 season in this area.	Fisheries stakeholders in order to discuss these key issues.	Yes
Mon_068_004_010623	S47	Email	We have the following comments to make regarding specific offshore features of the Mona windfarm project which would enable our members operations to potentially coexist: -	Noted, see responses below.	No
Mon_068_005_010623	S47	Email	development of most of the turbines and inter array cables away from fishing grounds as per the above map showing VMS activity. Positioning of turbines on top of specific tows or running a cable through a tow would be seen as a missed opportunity and an irreversible needless loss when it may be a case of running the cable or fixing a turbine only a small distance away. We would welcome continued involvement with the developer in the next stage and ideally a corridor through the middle of the development north to south where the Queen Scallop ground is commercially fished.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan.	Yes
				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A	





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				Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_068_006_010623	S47	Email	Inter cable arrays —as much north-south routing as possible to enable north-south towing	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan. The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	Yes
Mon_068_007_010623	S47	Email	tightly packed turbine boundary employed in the project design and the use of the largest available fixed turbines to reduce the total number of turbines required to generate the same amount of energy, allowing more room for the fishing vessels to operate within the site. A 1 mile distanced boundary would enable safe steaming access for fishing vessels to and from important commercial fishing grounds within Mona. 2mile distancing of turbines within a area avoiding key Queen Scallop fishing grounds (yellow VMS dots) as indicated in the Figure above would provide greater confidence of an ability to continue fishing in this area.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues.	Yes



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				will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_068_008_010623	S47	Email	Cable burial. The consultation indicates a desire to achieve 1m burial of cables to eliminate potential snagging with fishing gear. However, we have concerns that the developer may use rock burial or mattress where appropriate, i.e. when crossing points with other existing cables. This would be detrimental to the sandy gravelly Queen scallop beds and therefore should be avoided where the commercial Queen scallop beds are located. Scallop vessels have already paid witness to this with recently completed projects such as Moray east, where rock dumping has been excessive. We would urge that cable burial closely ties in with the surrounding gravelly substrate sea bed like for like.	Cable protection will be designed to minimise snagging hazards as far as possible. The Applicant has committed to the development of a cable burial plan, to outline cable burial depth, cable protection and monitoring of cables. The cable burial plan will be secured through a condition in the marine licence.	Yes
Mon_068_009_010623	S47	Email	Access to fishing during construction. The consultation documents outlines that a 500m exclusion zone around works may be operated for up to 4years. During the construction phase of the project, the greatest risk to our members business isa lack of access to fish as a result of the proposed 500 m exclusion zone. Our members concentrate approximately 75% of their annual effort within very specific small areas of the Mona and Morgan windfarm areas. If they are denied access to these areas during the construction phase, their fishing and processing business would be significantly impacted. We would urge the developers to consider adopting a phased approach to this, to ensure some degree of access to continue over the construction phase. If a corridor could be provided in line with the Queen Scallop fishery as discussed in earlier consultation stage, the construction phase could have a reduced impact on our members operations.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan.	Yes
				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_068_010_010623	S47	Email	1.4 Fish and shellfish ecology (see Chapter 8 of our PEIR) Some of the statements and assessment of impacts contained within the Review of Volume 2, chapter 8: Fish and shellfish ecology, does not provide much comfort to our members operating in the area. We do not agree with the assessment which frequently downplays and insinuates that only a small proportion of the Queen Scallop habitat is situated within Mona, i.e. Section 8.8.5.13 -"Long-term loss of habitat directly around the cables and wind turbines represent only a very small proportion of habitat within the fish and shellfish ecology study area, and so are unlikely to cause significant impacts on the wider scallop populations."	The magnitude of impact and sensitivity of queen scallop to long term habitat loss was reviewed in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_068_011_010623	S47	Email	Following construction, we are anxious and uncertain whether Queen Scallops will continue to spawn and gather in the same densities as they currently do on the sandy gravelly ground. We don't believe that the report provides a substantive assessments of the Queen Scallop ecology, or the impact that windfarms could have on	Further literature sources were reviewed and included in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement where available to support the evidence base defining the sensitivity of queen scallop. The	No



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			Queen scallop habitat. This needs to be addressed given the proposed Mona and Morgan wind farm projects will be situated on the most prominent and productive strip of Queen Scallop ground in Europe.	assessment parameters were reviewed, and any mitigation or monitoring measures considered proportionate and appropriate recommended.	,
Mon_068_012_010623	S47	Email	Our members concerns are around the lack of true understanding of the impact of wind turbines on shellfish habitats. Their concerns are not only in relation to a lack of space to operate between turbines, but also around the potential total loss of important Queen Scallop beds forever.	Noted. An assessment of the impacts of the Mona Offshore Wind Project on commercial fisheries receptors is presented in Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement.	No
Mon_068_013_010623	S47	Email	1.7 Commercial fisheries (see Chapter 11 of our PEIR) The commercial fisheries chapter provides mention to the Queen Scallop fishing grounds following information provided by West Coast Sea Products Ltd last year in face to face meetings, via online virtual meetings and via email. They remain opposed to several impact assessments made on "Scallop vessels —Scottish west coast" which they regard as themselves as a receptor in the report. The impact during construction and operation on the Queen scallop commercial fishery is considered as negligible —moderate in the report throughout which is not something we can agree South Western Fish Producer Organisation Ltd5 Pynewood House, 1A Exeter Road, Ivybridge, Devon, PL21 0FNto. If the developer enables a corridor for fishing, along with siting turbines and cables where fishing vessels do not tow gear and situated in a north-south direction, then there may well be minimal impact on this important fishery. This would show a desire from the developer for coexistence with current fishing operations. Alternatively there is the potential for our members to be omitted completely from this fishery, preventing their Queen scallop operations (catching and processing) to continue. Given their substantial contribution to this fishery, if their business ceases to operate, this will have massive ramifications on the entire supply chain.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan. The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and	Yes
Mon_068_014_010623	S47	Email	We are struggling to agree with the statement made in the report that scallop vessels (Scottish west coast) are regarded to be spatially adaptive. The report also fails to acknowledge the marine spatial squeeze crisis being faced by the fishing industry already, or acknowledge the cumulative effects of potentially losing access to prime Queen Scallop grounds within Morgan. The assessment must consider cumulative effects of loss of grounds due to marine spatial squeeze.	Cumulative effects are considered within the cumulative effects assessment section of the commercial fisheries chapter. This section considers the potential effects associated with spatial squeeze when assessing the Mona	No
Mon_068_015_010623	S47	Email	3. Do you have comments on how the project could support and work with local, regional and national communities and the economy? Should the proposed project proceed without any coexistence with the fishing industry, there is a real risk that there will be no economic benefits to the Kirkcudbright community within Dumfries and Galloway, who have been relying on fishing grounds within Mona for over 50 years.	Offshore Wind Project cumulatively with other relevant plans and projects. Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced	Yes



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				the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan.	
				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_068_016_010623	S47	Email	Our only recommendation for how this project could support and favour the local community, the 130 employees and fishermen employed by West Coast Sea Products Ltd and the other businesses which feed off them, would be to follow the design recommendations previously provided in this report in addition to earlier consultation responses.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan.	Yes
				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_068_017_010623	S47	Email	4. Do you have any comments / feedback on how we have understood the technical and environmental constraints of the areas offered to us by the Crown Estate as part of its leasing process? It is disappointing that little regard has been given to the fishing industry by the Crown Estate in the leasing process, particularly the Scallop industry, in the selection of the Mona site. If the proposed development was located some 6-7miles east, the proposal would still be located in an area of the Irish Sea with sufficient wind but would have avoided important commercial fishing operations.	Comments regarding the Crown Estates recognition of commercial fisheries activity, as much as a potential constraint on site selection as other parameters such as water depth; wind capacity and seabed conditions, are noted. However, it has been an important factor considered by bp/EnBW to inform the site selection of the array area, and associated design commitments.	Yes





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				Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan.	
Mon_069_029_010623	S42	Email	In addition, unlicensed fishing of any kind, regardless of species, is vigorously enforced in Manx waters. See; hiips://www.gov.im/about-the-government/departments/environment-food-and-agriculture/environment-directorate/fisheries/sea-fisheries/legislation-policy-guidance/for details.	Noted. The Isle of Man fisheries legislation and management measures have been reviewed and included as appropriate within Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement and Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_069_035_010623	S42	Email	This point is also noted in the Commercial Fisheries chapter, queen scallop should be presented as an equivalent to Figure 1.20, and using the same data sources. Example maps comparing historic QSC and SCE fishing grounds in Manx waters from similarly-available VMS data sources are sown below, but regional UK waters should also be shown for QSC fishing activity.	The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	No
Mon_069_036_010623	S42	Email	Queen and king scallop: fishing activity maps based on EU VMS data (2018-2022) from Citrix (available from MMO) merged with Nest Forms data (held by DEFA, IoM Government). Alternatively, EU logbook data from Citrix (available from MMO) could be used in place of Nest Form data.	The Applicant notes your response. The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	No
Mon_069_049_010623	S42	Email	There is acknowledgement of high densities of scallop in Manx waters, but only a very small selected area within the array site is highlighted. This cannot be considered as equivalent presentation of species, although both are highly relevant to both IoM and UK fishers in the region. This should be addressed.	The Applicant notes your response. The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	No
Mon_069_050_010623	S42	Email	See provided maps above for example; Data compiled recently for the Isle of Man Government to show fishing activity (using swept area as a proxy) clearly shows the distribution of these fisheries in Manx waters. An equivalent presentation of queen scallop fishing activity and important areas in adjacent UK waters also seems appropriate, not only for the very limited area of the array. While the technical report and Chapter report's king scallop data is broadly indicative, the queen scallop data is not.	The Applicant notes your response. The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	No
Mon_069_138_010623	S42	Email	Chapter 11: Commercial Fisheries A portion of the Isle of Man territorial sea, corresponding with ICES area 36E5 lies within the Mona Commercial Fisheries Study Area (Figure 11.1) and, as such, Manx commercial fisheries should be fully considered in the PEIR and future EIA assessments using the best available data.	The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the	No



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				Environmental Statement and has been brought into the commercial fisheries assessment.	
Mon_069_139_010623	S42	Email	As the Isle of Man is not part of the UK, the assessment must be considered in the context of a separate/neighbouring jurisdiction, with its own legislative system, and in terms of transboundary effects.	This has been acknowledged and considered within the commercial fisheries chapter of the Environmental Statement.	No
Mon_069_140_010623	S42	Email	The importance of commercial fishing in the Manx territorial sea, within the Mona Commercial Fisheries Study Area is illustrated in several Figures in the Technical Report, eg. 1.44, 1.51 and 1.52. However, Figure 1.44 appears to cover all-vessel landings, whereas Figures 1.51 and1.52 indicate use of >12m data only. How then are all landings ascribed to vessel classes for the purpose of identifying fleet impact, when a sector is excluded?	This is an acknowledged limitation of the MMO and ICES VMS datasets, which does not include vessels <12m in length. The Applicant has received VMS data from the Isle of Man Government which has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	No
Mon_069_141_010623	S42	Email	As noted elsewhere, ALL IoM VESSELS are fitted with VMS and so data is available for this fleet and should be included somehow, otherwise it could be assumed that these collective data may tend to underestimate the activity of <12m fleet sector, and potentially disproportionately the Manx fleet, due to its relatively closer proximity to the array site.	This is an acknowledged limitation of the MMO and ICES VMS datasets, which does not include vessels <12m in length. The Applicant has received VMS data from the Isle of Man Government which has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	No
Mon_069_142_010623	S42	Email	Technical Report General points: The Methodology notes that data over at least a four year time period has been assessed, with up to 10-year assessment where possible. The Isle of Man government's view is a four year baseline dataset is not sufficient to assess fisheries given the disruption to activity between 2019-2022 resulting from Brexit, Covid-19, and the fuel/energy crisis. The cyclical nature of scallop fisheries is noted, but the recent permacrisis has affected all fisheries. The value of landings at first-sale is presented, though the report notes that additional value (up to 60% of landed value) is generated from commercial fishing activity. It is suggested that the downstream economic multipliers (Type I and Type II) are incorporated into the assessment of impacts on fishing activity, using peer-reviewed economic multiplier analysis where possible, in order to capture to full economic impact. Seafish has done work in this area.	A 10 year data period has been obtained for both MMO and STECF landings data and MMO and ICES VMS data, specifically to address the cyclical nature of fisheries. Reference to a four year data period has been removed within the commercial fisheries chapter of the Environmental Statement. The Seafish Best Practice Guidance for Fishing Industry Financial and Economic Impact Assessments suggest that downstream economic multipliers can be useful if a policy is expected to have a large economic and/or employment impact. However, the guidance states that multipliers do not take account of displacement of supply chain activity to other parts of the fishing industry or other industries, and therefore are likely to overstate the medium to longer run impacts. Due to the uncertainty about displacement effects, the guidance states that it is generally not recommend that multipliers are used in headline figures to assess the economic impact of a fishing closed area (Seafish, 2012). There are very few sources of fisheries-specific multipliers; the Fraser of Allander Institute undertook work for Seafish in 2004 and their report is one of the most cited. However, with the consolidation of the industry and other developments seen in the sector, this is considered to be outdated.	
Mon_069_143_010623	S42	Email	The data source used for landings, 2010-2020, notes that resolution is only available at ICES Rectangle and only for vessels over-10 m. The MMO may also hold higher-resolution under-10 m vessel data for some species within their Monthly Shellfish Activity Return dataset. The Isle of Man collects comparable data in the Monthly Shellfish Log dataset. Both of these data sources are now replaced by the Under-10m MMO Catch App. There is under-10 m data available. The Morecambe PEIR assessment includes this data. It is not clear why under-15 m data is not included in the VMS dataset. All vessels over-12 m have been required to carry VMS during the	has been included, however the limitation that vessels this size are not required to complete logbooks so may be	No





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			reports study period. In the Isle of Man, vessels targeting scallops have been required to carry VMS since 2015, irrespective of size.	acknowledged limitation of the MMO and ICES VMS data, which does not include vessels <12m. The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	
Mon_069_144_010623	S42	Email	The displacement effects, particularly in relation to dredge activity targeting king scallop and queen scallop, could have significant impacts upon important grounds elsewhere in the regional study area. The EIA should consider the displacement effects, and the potential for increased fishing area in adjacent grounds within the eastern Irish Sea if the EIA determines that existing activity is indeed likely to be displaced.	The potential for loss or restricted access to fishing grounds and displacement impacts are presented within the commercial fisheries chapter of the Environmental Statement.	No
Mon_069_145_010623	S42	Email	Table 1.4: Seasonal closures of the scallop fisheries by administration Isle of Man 01 June to 31 October Five closed areas The closure period is correct, but the whole territorial sea is closed, not5 areas. Please correct accordingly.	Noted and now amended within the commercial fisheries chapter of the Environmental Statement.	No
Mon_069_146_010623	S42	Email	1.4.2.9 '33 scallop vessels registered in IoM'This is not correct. At 2023 there are 29 and 25 Manx-registered vessels licenced for scallops and queen scallops respectively. However, that doesn't adequately scope the fishery in Manx waters, since a total of 55 vessels are licenced to fish for scallops (Pecten maximus) and 36 vessels that can fish for queen scallops (<i>Aequipecten opercularis</i>) in Manx waters. The difference being UK-registered vessels	This information was informed by feedback from Project- specific consultation with the Manx Fish Producers Organisation (MFPO). The commercial fisheries chapter of the Environmental Statement has now been updated with the correct values.	No
Mon_069_147_010623	S42	Email	1.4.6.7 Queen scallops are fished almost exclusively (and in recent years actually so) with otter trawl in Manx waters, not dredge.	Noted and now amended within the commercial fisheries chapter of the Environmental Statement.	No
Mon_069_148_010623	S42	Email	1.4.8 Spatial distribution of fishing activity Please clarify in the text whether the term 'UK vessels' includes Isle of Man vessels, given that IoM is not part of the UK. For example, Figure 1.55 differentiates Northern Irish (which is part of the UK) vessels from 'UK vessels', but Manx vessels (which are not part of the UK) are not separated.	The description of the official data sources has been updated within the commercial fisheries chapter to clarify that the term "UK Vessels" includes Isle of Man vessels within each used dataset.	No
Mon_069_149_010623	S42	Email	How have Manx vessels been considered in thisanalysis?1.4.6.18 'Queen Scallop are also caught by otter trawl vessels, as discussed below.'1.4.6.21 Generally, queen scallop, outside Manx waters, are targeted using skid dredges	Activity by Isle of Man vessels has been informed though various sources outlined in section 1.3.2 of the commercial fisheries technical annex of the Environmental Statement. Such sources include MMO landings, VMS data, WG Scallop data and feedback from stakeholders.	No
				The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	
Mon_069_150_010623	S42	Email	Table 1.5: Aquapecten = Aequipecten Figure 1.44This seems like an odd data presentation. How does fishing effort (kW days) relate to a port? Should it be simply landings (tonnes)?	updated. Figure 1.44 within the commercial fisheries chapter of the	No
				Environmental Statement has been updated to reflect port by landings (tonnes).	
Mon_069_151_010623	S42	Email	1.4.8.11 –12while this is presenting a specific piece of information, it does seem overly selective, and provides no context for the wider queen scallop fishery areas, which may be indirectly affected by this development e.g. by displacement, or recruitment effects. This has been done for scallops (Fig 1.55), why not for queen scallop?	The commercial fisheries chapter of the Environmental Statement describes the queen scallop grounds located within the Mona Array Area. This is partly informed by stakeholder feedback that focused on the Mona Array Area to understand the potential direct impacts of the proposed development on this fishery. Discussion on wider fishing	No



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				activity is included within the commercial fisheries chapter of the Environmental Statement. This figure within the commercial fisheries chapter has utilised data from the scallop Working Group, which is not available for Ouese acallop.	
				available for Queen scallop. MarineSpace, an ERM Group Company, have requested further VMS data from the Isle of Man Government, whom of which have since provided. This has been incorporated into the commercial fisheries technical annex of the Environmental Statement.	
Mon_069_152_010623	S42	Email	For example; Manx waters Figure 1.51 if only using >15m data, how have smaller vessels been considered within the analysis. For example, Isle of Man has no >15m static gear vessels, does this mean that no Manx vessels have been included? It is no apparent that Manx data is presented in Fig 1.57 either —why does the data stop at the Territorial Sea boundary? So how can effects on this sector be considered?	Within the commercial fisheries chapter of the PEIR, Figure 1.55 utilises WG Scallop data which includes VMS data from Isle of Man vessels of all sizes. Figure 1.57 uses data obtained from the Welsh Government, so does not include IoM waters.	No
				The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	
Mon_069_153_010623	S42	Email	Figure 1.58as noted above, why not link data sets to provide a more comprehensive map? Does fishing activity stop at the Manx TS limit? Fish and fishing activity are trans-boundary, so artificial boundaries may confuse the overall picture of activity, and also how the different jurisdictions have been included or not in the assessment.	This data was obtained from the Welsh Government to supplement the VMS data, as it specifically covered the Mona Array Area. It has not been displayed with other data as the data is based on various different datasets and only shows estimated relative fishing intensity. Data which shows fishing activity for the whole commercial fisheries study area is included within the commercial fisheries technical annex of the Environmental Statement. The figures displaying the Welsh Government data have been updated to clarify that this data only covers Welsh waters.	No
				The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	
Mon_069_154_010623	S42	Email	As noted previously, ALL mobile gear Manx vessels have VMS fitted and report data, and so could be similarly considered and presented for Fig 1.58.	The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	No
Mon_069_155_010623	S42	Email	Data on smaller Manx static gear vessels could be obtained from various sources, including Isle of Man Government, MFPO or Manx fishermen directly.	The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	No
Mon_069_156_010623	S42	Email	See below for comparative commercial fishing activity maps recently compiled for Isle of Man Government and for the Manx territorial sea area.	The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated	No





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				into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	
Mon_069_157_010623	S42	Email	Image within text - Crab and lobster commercial fishery activity data (2010 to 2021) (static gear) based on pot hauls (as a proxy for fishing effort/activity)). Data is obtained from monthly shellfish activity forms, but which does not contain EU logbook data from larger U.K. vessels (I.e. U.K. vessels fishing in 38E5), and so is not comprehensive. It is not known whether these data is available on Citrix (i.e. from MMO), or whether only DEFA holds it.	The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	No
Mon_069_158_010623	S42	Email	Image in text - Whelk commercial fishery activity map (2010 to 2021)(static gear) based on pot hauls (as a proxy for fishing effort/activity)). Data is obtained from monthly shellfish activity forms, but which does not contain EU logbook data from larger U.K. vessels (I.e. U.K. vessels fishing in 38E5), and so is not comprehensive. It is not known whether these data is available on Citrix (i.e. from MMO), or whether only DEFA holds it.	The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	No
Mon_069_159_010623	S42	Email	image within text - King scallop: fishing activity map (dredge) based on EU VMS data (2017/18-2021/22) from Citrix (available from MMO) merged with Nest Forms data (held by DEFA, IoM Government). Alternatively, EU logbook data from Citrix (available from MMO) could be used in place of NestForm data.	The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	No
Mon_069_160_010623	S42	Email	Image in text - Queen scallop: fishing activity map (otter trawl) based on EU VMS data (2018-2022) from Citrix (available from MMO) merged with NestForms data (held by DEFA, IoM Government). Alternatively, EU logbook data from Citrix (available from MMO) could be used in place of NestForm data. Figure 1.63 (Observations) appears to show selective and limited data for Manx waters. For example, due to seasonal restrictions and fishing patterns there are only two months of the Manx scallop fishing season available during the observation period of 12 months (between June 2021 and Nov 2022), none of which is within 2021.	The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment. Figure 1.63 within the commercial fisheries technical annex of the Environmental Statement uses data that is limited by the time period of the offshore surveys and is only supplementary. Seasonality of the different fishing fleets is considered when interpreting this figure.	No
				The Applicant has obtained additional relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	
Mon_069_161_010623	S42	Email	As such, while it is not expected to be comprehensive, restricted data presentation should be more thoroughly explained if the reports are to be considered reasonably representative and provide comfort of due consideration.	Limitations with data sources used to inform the commercial fisheries assessment have been discussed fully within the Commercial fisheries technical report of the Environmental Statement.	No
				Further description of data limitations has been added where deemed appropriate, for example, the inclusion of cross-references to data limitations where the datasets are analysed.	
Mon_069_162_010623	S42	Email	The Isle of Man Government requests consideration of these points and further engagement as appropriate.	All responses from the Isle of Man Government have been considered and subsequent actions have been taken in updating the commercial fisheries chapter of the Environmental Statement.	No
				Further engagement with commercial fisheries stakeholders has taken place between consultation on the PEIR and	





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				submission of the Application. Engagement with commercial fisheries stakeholders is ongoing through the development of the Fisheries liaison and coexistence plan.	
Mon_069_163_010623	S42	Email	Vol. 2. Chapter 11 Commercial Fisheries Consultation has not occurred with the Isle of Man Scallop Management Board, nor with DEFA Fisheries Division directly on the Isle of Man. These are considered to be a potentially significant omissions in achieving comprehensive coverage of Manx fisheries and for clarifying queries regarding appropriately representative VMS data and observational survey data (see other comments).	Table 1.2 within the commercial fisheries chapter of the Environmental Statement has been updated to clarify attendance, as the Isle of Man Government were invited and attended during meetings in November 2022 and September 2023.	No
				The Applicant has obtained relevant VMS data from the Isle of Man Government, which provides comprehensive coverage of Manx fisheries in the region. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	
Mon_069_164_010623	S42	Email	11.2 Policy context Please note the following for the Isle of Man: The Isle of Man Seafisheries Strategy is now superseded (by the Fisheries Statement) to some extent, but remains indicative of current policy;hiips://www.gov.im/media/1349731/sea-fisheries-strategy.pdf	This has been acknowledged and considered within the commercial fisheries chapter of the Environmental Statement.	No
Mon_069_165_010623	S42	Email	The Isle of Man Fisheries Statement has recently been through public consultation and is currently going through council of Ministers for final approval. It is substantially similar to the draft version; hips://consult.gov.im/environment-food-and-agriculture/the-draft-isle-of-man-fisheries-statement/supporting_documents/DRAFT%20Isle%20of%20Man%20Fisheries%20Statement%20131222.pdf	This has been acknowledged and considered within the commercial fisheries chapter of the Environmental Statement.	No
Mon_069_166_010623	S42	Email	The final version, along with other relevant Manx fisheries policy, will be available here:hiips://www.gov.im/about-the-government/departments/environment-food-and-agriculture/environment-directorate/fisheries/sea-fisheries/legislation-policy-guidance/#accordion	This has been acknowledged and considered within the commercial fisheries chapter of the Environmental Statement.	No
Mon_069_167_010623	S42	Email	The Long Term Management Plan for king scallops has been approved and is available here;hiips://www.gov.im/media/1376550/ltmp-10-260522.pdf	This has been acknowledged and considered within the commercial fisheries chapter of the Environmental Statement.	No
Mon_069_168_010623	S42	Email	Table 11.5: Summary of key desktop data sources/reports As noted elsewhere, 'VMS data for UK and Isle of Man vessels (≥15m)' does not adequately reflect Manx fishing fleet. MMO data is available for >12m, and for ALL mobile gear vessels fishing Manx waters, regardless of size.	VMS data - although UK>12m in length have VMS, the MMO only provide datasets for vessels >15m in length. This is an acknowledged limitation of the MMO and ICES VMS data within the commercial fisheries chapter of the Environmental Statement, which does not include vessels <12m in length. Data from WG Scallop has been obtained which includes VMS data from Isle of Man vessels of all sizes. Feedback has been obtained from IoM fisheries stakeholders which has also been used to inform the assessment.	No
				The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	
Mon_069_169_010623	S42	Email	Noting ICES data for >12m was utilised, but the term 'VMS data for European mobile bottom contacting gear vessels (>12m)' is ambiguous –does it include UK and Manx vessels?	The ICES VMS dataset ""VMS data for European mobile bottom contacting gear vessels (>12m)"" does not include Isle of Man vessels. This has since been clarified within the commercial fisheries annex of the Environmental Statement.	No





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				The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	
Mon_069_170_010623	S42	Email	Given these queries, it is not apparent that the best and most comprehensive data has been used to inform the receptor, particularly in relation to the Manx fleet.	It can be confirmed that MMO landings statistics data by ICES Rectangle does include vessels from the Isle of Man. This is set out within the Methodology section of the commercial fisheries annex of the Environmental Statement.	No
Mon_069_171_010623	S42	Email	Please confirm that the following includes Manx landings: 11.4.2.2'Species landing data is recorded by ICES Rectangle and collected via the EU logbook scheme. Landings data has been collated for the UK and EU Member states for all ICES Rectangles that overlap the Morgan commercial fisheries study area, as illustrated in Figure 11.1.'	bottom contacting gear vessels (>12m)'"" does not include	No
				The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	
Mon_069_172_010623	S42	Email	Vessel monitoring system data 11.4.2.4As noted, requires clarification on the ICES data set (does it include Manx vessels?).	The ICES VMS dataset ""VMS data for European mobile bottom contacting gear vessels (>12m)"" does not include Isle of Man vessels. This has since been clarified within the Methodology section of the commercial fisheries annex of the Environmental Statement.	No
				The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	
Mon_069_173_010623	S42	Email	Noting that approximately 8/28 (around 28%) of Manx mobile gear vessels are under 12m, and their VMS data is available via MMO.	The ICES VMS dataset ""VMS data for European mobile bottom contacting gear vessels (>12m)"" does not include Isle of Man vessels. This has since been clarified within the Methodology section of the commercial fisheries annex of the Environmental Statement.	No
				The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	
Mon_069_174_010623	S42	Email	Please consider as appropriate, however it is acknowledged that few of these vessels would operate close to the Mona site.	The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	No
Mon_069_175_010623	S42	Email	11.4.3 Site-specific surveys, Table 11.6, (and Section 1.4.8.13of the Technical Report),and noting: 11.4.7.2 (Data Limitations): It should be noted that although smaller vessels are not captured within the MMO (<15m	The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated	No





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			vessels) and ICES (<12m vessels) VMS data, information on their activity has been reviewed through feedback from stakeholder consultation and other supplementary data sources, such as information gathered via site specific surveys undertaken in 2021 and 2022.'	into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	
Mon_069_176_010623	S42	Email	For example, Figure 1.63 of the Technical Report shows observations of fishing vessels between 30 June and 18 September 2021, and between April and September 2022-10thJuly November 2022.By comparison, data available to the Isle of Man Government on the Manx queen scallop fishery during 2021 and 2022 shows, in relation to the following grounds;	Limitations of the data are presented within Table 1.1 of the commercial fisheries technical annex and in the Baseline Environment section within the commercial fisheries chapter of the Environmental Statement. To account for seasonality of activities of different fishing fleets, potential impacts are presumed to occur during the peak activity periods for each receptor group.	No
Mon_069_177_010623	S42	Email	Image within text - 1 July-24th September 2021: high levels of fishing on Chickens, not reflected in Figure 1.63.	Limitations of the data are presented within Table 1.1 of the commercial fisheries technical annex and in the Baseline Environment section within the commercial fisheries chapter of the Environmental Statement. To account for seasonality of activities of different fishing fleets, potential impacts are presumed to occur during the peak activity periods for each receptor group.	No
Mon_069_178_010623	S42	Email	Image within text- As such, the Isle of Man Government does not consider that these sources and information presented in Figures 1.55, 1.56 and 1.59 adequately represent the small vessel activity within Manx waters, and seeks confirmation that the fishing activity extent of the Manx fleet, in Manx waters, has been adequately presented and considered within the PEIR.	Figure 1.55 within the commercial fisheries annex of the Environmental Statement utilises WG Scallop data, which includes VMS data from Isle of Man vessels of all sizes. Figure 1.56 displays the indicative queen scallop grounds within the Mona Array Area, which is clarified in the title; this supplementary information has been included to inform the assessment on direct impacts as a result of the Mona Array Area. Figure 1.59 uses data obtained from Welsh Government (National Resource Wales), which focuses on Welsh waters and does not include Isle of Man waters.	No
				Although UK vessels >12m in length can be recorded via VMS, the MMO only provide datasets for vessels >15m in length. This is an acknowledged limitation of the MMO and ICES VMS datasets within the commercial fisheries chapter of the Environmental Statement, which does not include vessels <12m in length.	
				Data from WG Scallop has been obtained, which includes VMS data from Isle of Man vessels of all sizes. Feedback has been obtained from Isle of Man fisheries stakeholders, which has also been used to inform the significance of effect assessment.	
				The Applicant has obtained relevant VMS data from the Isle of Man Government. This data has now been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	
Mon_069_179_010623	S42	Email	Figures11.2-11.4: please clarify whether Manx fishing vessels are included in UK vessels (noting that IoM is not part of UK, and so technically are non-UK vessels –see Figure 11.4) or not, and amend figure legends accordingly.	All VMS figure legends within the commercial fisheries technical annex of the Environmental Statement have been updated to clarify whether the dataset used includes Isle of Man vessels.	No





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Mon_069_180_010623	S42	Email	Static gear 11.4.4.12 -11.4.4.14presumably relates to Figures 1.51, 1.57and 1.59and therefore only to >15m vessels.	These sections of the commercial fisheries technical annex have been updated for the Environmental Statement to include cross references to the relevant figures.	No
Mon_069_181_010623	S42	Email	How have smaller potting vessels been included to any extent within this assessment, or have they not?	Text within the commercial fisheries technical annex of the Environmental Statement has been updated to include reference to the following, which capture small potting vessels: analysis of landings data, stakeholder feedback and scouting surveys (no data shown is shown due to sensitivities of gear locations, as described in the technical report). The significance of effect assessment has been informed by these.	No
Mon_069_182_010623	S42	Email	Figure 1.51 shows static gear activity within the Manx territorial sea, but since the Isle of Man has no >15m static gear vessels, how has the Manx static sector been considered within this assessment?	Text within the commercial fisheries technical annex of the Environmental Statement has been updated to include reference to the following, which capture small potting vessels: analysis of landings data, stakeholder feedback and scouting surveys (no data shown is shown due to sensitives of gear locations, as described in the technical report). The significance of effect assessment has been informed by these.	No
Mon_069_183_010623	S42	Email	If they have not, how can there be confidence in the conclusion of the PEIR in relation to fisheries impacts?	Text within the commercial fisheries technical annex of the Environmental Statement has been updated to include reference to the following, which capture small potting vessels: analysis of landings data, stakeholder feedback and scouting surveys (no data shown is shown due to sensitives of gear locations, as described in the technical report). The significance of effect assessment has been informed by these.	No
Mon_069_184_010623	S42	Email	1.4.8.5'Figure 1.53 illustrates that dredge vessels (>12m) were active across the Mona commercial fisheries study area. These dredge vessels are largely from Ireland, the Isle of Man, Northern Ireland and Scotland (section 1.4.6). Highest intensities of these vessels were observed within the Isle of Man 12nm limit, and within the central and western parts of the Mona Array Area. This is supported by feedback from project specific consultation which highlighted that the central and west part of the Mona Array Area is an important queen and king scallop fishing ground. It is evident that dredge activity and intensity varies by year, which also corroborates with information from fisheries stakeholders, which suggest that the fishery is cyclical over seven to eight year periods.'	Paragraph 1.4.8.5 within the commercial fisheries annex of the Environmental Statement only discusses activity of dredge vessels, whereas paragraph 1.4.8.6 discusses otter trawl activity, as is clarified. Text within the commercial fisheries technical annex of the Environmental Statement has been updated to clarify that these queen and king scallop grounds are only relevant to dredge vessels.	No
Mon_069_185_010623	S42	Email	As noted elsewhere, this conclusion only applies to dredge-caught queen scallops, which is the primary method used by UK (esp. Scottish) vessels. The Manx fleet predominantly uses otter trawl for queen scallops (as recognised in the Technical Report), and so this area is not particularly relevant to this sector, nor is an equivalent 'important queen scallop fishing ground' identified for otter trawl vessels.	Paragraph 1.4.8.5 within the commercial fisheries annex of the Environmental Statement only discusses activity of dredge vessels, whereas paragraph 1.4.8.6 discusses otter trawl activity, as is clarified. Text within the commercial fisheries technical annex of the Environmental Statement has been updated to clarify that these queen and king scallop grounds are only relevant to dredge vessels.	No
Mon_069_186_010623	S42	Email	This is important, and should be considered for Section 11.4.4.20 and clear differentiation made between otter trawl activity for queen scallops and for Nephrops (to the west) see Figure 1.54. The receptor needs differentiation between target species for comprehensive assessment.	Text within the commercial fisheries chapter of the Environmental Statement has been updated to clarify differentiation between otter trawl activity for scallop and Nephrops. Trawling for nephrops has not been included as a receptor group within the commercial fisheries chapter of	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				the Environmental Statement due to areas of activity not overlapping with the Offshore Development Area.	
Mon_069_187_010623	S42	Email	Figure 1.54clearly indicates the Chickens and East Douglas Ground queen scallop grounds, to the west and north west of the array area, as a high fishing effort area for queen scallops (see below).	This has been acknowledged within the commercial fisheries chapter of the Environmental Statement.	No
Mon_069_188_010623	S42	Email	Otter trawl landings of queen scallop in Manx waters in 2021 and 2022 were 820 and 890 t respectively.	This comment has been acknowledged.	No
Mon_069_189_010623	S42	Email	Table 11.7(Receptor Groups) appears broadly correct but note potential requirement for differentiation between otter trawl species-specific activity (Nephrops vs queen scallop).	Trawling for nephrops has not been included as a receptor group within the commercial fisheries chapter of the Environmental Statement, due to areas of activity not overlapping with the Offshore Development Area.	No
Mon_069_190_010623	S42	Email	Table 11.13: Impacts scoped out of the assessment for commercial fisheries Agree.	This comment has been acknowledged.	No
Mon_069_191_010623	S42	Email	Given this statement, and the proximity to the Morgan array site (also with importance to this sector –how is it predicted to have low impact? Where will they go?	This section is considering 'loss or restricted access to fishing grounds' on Scottish scallop vessels from the project alone.	No
				Cumulative impacts with the Morgan Offshore Wind Project, and other relevant plans and projects, are considered in the cumulative effects assessment section of the commercial fisheries chapter of the Environmental Statement.	
				Displacement of Scottish west coast scallop vessels and other scallopers into the Manx Territorial Sea is limited, as under the Isle of Man Scallop LTMP, access to king scallop dredging is limited to vessels under 221kW, unless they possess Grandfather Rights. These Grandfather Rights will be terminated by November 2024 under the LTMP. Only vessels which possess a UK and Isle of Man fishing vessel licence with scallop entitlement, may fish for scallops within Manx Territorial waters.	
Mon_069_192_010623	S42	Email	How has displacement into, or adjacent to, Manx waters been considered given the combined areas affected?	Displacement is considered separately in section 6.8.3 of the commercial fisheries chapter of the Environmental Statement. Displacement of Scottish west coast scallop vessels and other scallopers into the Manx Territorial Sea is limited, as under the Isle of Man Scallop LTMP, access to king scallop dredging is limited to vessels under 221kW, unless they possess Grandfather Rights. These Grandfather Rights will be terminated by November 2024 under the LTMP. Only vessels which possess a UK and Isle of Man fishing vessel licence with scallop entitlement, may fish for scallops within Manx Territorial waters.	
Mon_069_193_010623	S42	Email	Has it been considered how many of these vessels have a Manx licence?	The west coast Scottish scallopers have indicated during project specific consultation that they do not operate within Manx waters. King scallop and queen scallop swept area (km2) data between 2017 to 2023 was provided by the Isle of Man Government following Section 42 consultation. All licenced scallop fishing vessels, regardless of size and country of origin, are required to operate a VMS system in Manx Territorial Waters. This VMS dataset is, therefore, inclusive of all non-Isle of Man king and queen scallop vessels that have a Manx licence and provides an overview of the spatial extent of king and queen fishing activity within	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				and around Manx territorial waters. This data has been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	
Mon_069_194_010623	S42	Email	The Isle of Man Government would be interested in sight of more detail on this assessment/conclusion, and the associated quantitative evidence base.	Additional king scallop and queen scallop swept area (km2) data between 2017 to 2023 was provided by the Isle of Man Government following Section 42 consultation. All licenced scallop fishing vessels, regardless of size and country of origin, are required to operate a VMS system in Manx Territorial Waters. This VMS dataset is, therefore, inclusive of all non-Isle of Man king and queen scallop vessels that have a Manx licence and provides an overview of the spatial extent of king and queen fishing activity within and around Manx territorial waters. This data has been incorporated into the commercial fisheries technical annex of the Environmental Statement and has been brought into the commercial fisheries assessment.	No
Mon_069_195_010623	S42	Email	Scallop vessels—Isle of Man '11.8.2.20Feedback from project-specific consultation has established that, at the time of writing, there are 33 scallop vessels registered in the Isle of Man(the majority of these vessels have a licence for both king and queen scallop)' See comment above 1.4.29	With regard to comment 1.4.2.9, this information was informed by feedback from project specific consultation with the Manx Fish Producers Organisation (MFPO). The commercial fisheries chapter of the Environmental Statement has now been updated with the values provided by the Isle of Man Government. This has been amended within the assessment to state: 'At the time of writing, there are 55 vessels licenced to fish for king scallop in Isle of Man waters (29 of which are Isle of Man registered vessels) and 36 that can fish for queen scallops (25 of which are Isle of Man registered vessels)'.	No
Mon_069_196_010623	S42	Email	33 Manx-registered scallop vessels is not correct. At 2023 there are 29 and 25 Manx-registered vessels licenced for scallops and queen scallops respectively. However, that doesn't adequately scope the fishery in Manx waters, since a total of 55 vessels are licenced to fish for scallops (Pecten maximus) and 36 vessels that can fish for queen scallops (<i>Aequipecten opercularis</i>) in Manx waters. The difference being UK-registered vessels	Text with the commercial fisheries chapter of the Environmental Statement has been updated with the correct values.	No
Mon_069_197_010623	S42	Email	Also: 'Fisheries monitoring has recorded 2 Manx vessels large enough to fish outside of the Manx territorial sea.'	Text with the commercial fisheries chapter of the Environmental Statement has been updated with the correct values.	No
Mon_069_198_010623	S42	Email	Vessel size is not indicative of ability to fish in an area (likelihood perhaps), but actual data showing presence is. Essentially, size class can't be considered as a proxy for spatial use, only actual fishing activity.	Text with the commercial fisheries chapter of the Environmental Statement has been updated with the correct values.	No
Mon_069_199_010623	S42	Email	11.8.2.21 -22 Scallop vessels –Isle of Man '.loss or restricted access to fishing grounds is assessed as only representing between 5-20% of the annual value of landings for vessels within this receptor group.'	The definitions of magnitude of impact are outlined within Table 6.10 of the commercial fisheries chapter of the Environmental Statement. Estimated percentage reduction in annual value of landings valuations are informed by expert judgement that is based on data analysis, stakeholder feedback, the array layouts presented and how these may affect fishing activity.	No
Mon_069_200_010623	S42	Email	Noted: and given the combined effects of the Covid pandemic and Brexit, 5-20% of annual value must be considered significant, and over a period of 4 years.	Factors such as the covid pandemic and Brexit have been considered within the assessment (e.g. within section 1.5 of the commercial fisheries technical annex of and within	No





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				section 6.4.6 of the commercial fisheries chapter of the Environmental Statement.	
Mon_069_201_010623	S42	Email	As such, the conclusion that the magnitude of impact for this receptor is deemed as low and negligible (Table 11.16), is not supported and the Isle of Man Government requests an indication as to how 5-20% of lost revenue for the Manx scallop fleet will be compensated over the four year period?	No compensation/additional mitigation is proposed for significance of effects that are not deemed significant in EIA terms. However, it should be recognised that a suite of embedded mitigation will be implemented related to minimising all commercial fisheries impacts.	No
				Whilst, our magnitude of impact definition covers a potential loss of revenue of between 5-20%, based on existing data, we feel that any such loss, will be very much at the lower end of this range, i.e. 5%"	
Mon_069_202_010623	S42	Email	11.8.2.34: 'The Isle of Man Government administers a robust Scallop long-term management plan (LTMP) within its territorial waters; access to the fishery is predominantly restricted to vessels registered to the Isle of Man.'	Included with row below.	No
Mon_069_203_010623	S42	Email	This statement is potentially misleading in terms of restrictions. Manx fisheries are managed as inshore fisheries, using an ecosystem-based approach and informed by best-available science. As such, access to the fishery is based on a variety of factors such as track record (and therefore regional fishing trends) and vessel characteristics, but not on place of registration. Data for 2023 indicates that, of the 55 vessels licenced king scallops, 29 are registered in the Isle of Man, while 26 are registered in the UK.	Wording has been updated within the commercial fisheries chapter of the Environmental Statement as per the suggested amendment.	No
Mon_069_204_010623	S42	Email	Suggested amendment: 11.8.2.30: The Isle of Man Government administers a robust long-term management plan (LTMP) for king scallops within its territorial waters. The fishery is highly regulated and, whilst access is non-discriminatory by way of nationality or home port, eligibility to participate is determined on the basis of a number of factors including historic track record and vessel characteristics.	Wording updated as per suggested amendment.	No
Mon_069_205_010623	S42	Email	Magnitude of impact 11.8.2.38 Existing UK legislation does not prohibit commercial fishing within operational offshore wind farms.' The examples provided include towed demersal and static gear. Given the inter-array minimum burial depth of 0.5m and potential for seabed cable protection —how likely is it that benthic dredging will practically continue in the array?	The Applicant has committed to the development of a cable burial plan, to outline cable burial depth, cable protection and monitoring of cables. Minimum target burial depths have been determined to enable fishing activities to continue within the Mona Array Area, once the wind farm is operational, as far as possible. Fisheries stakeholders have indicated that dredging could coexist with the project if cables are adequately buried and run in a north to south direction, which the Applicants have considered, as far as possible. This feedback has been used to inform the project design envelope.	Yes
Mon_069_206_010623	S42	Email	Will monitoring of fishing patters during and post-constriction be undertaken to confirm these conclusions? This may be important to the Isle of Man, particularly if displaced vessels also hold Manx licences.	As per commitment in table 6.32 of the commercial fisheries chapter of the Environmental Statement, annual reviews for the first five years of the operations and maintenance phase will be undertaken. Annual reviews will include the analysis of VMS and landings data, to identify whether there are any notable changes to fishing activity within the Mona Array Area during this period of operation and maintenance. A commitment to undertake this is to be included within the outline Fisheries Liaison and Co-existence Plan, which has been submitted as part of the DCO application.	No
Mon_069_207_010623	S42	Email	11.8.2.63'As it is assumed that fishing will continue within the Mona Array Area during the operations and maintenance phase, the area unsuitable for continued fishing is assessed as representing <5% of the annual value of landings for vessels in this receptor group.' At 11.8.2.2, this receptor group is indicated as losing between 5 and 20% -why is lower value used here? Please clarify.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update stakeholders on the revised Mona array boundary and measures to incorporate a Scallop Mitigation Zone in key scallop grounds within the Mona Array Area. The project	Yes



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				has also made commitments on the positioning of wind turbines in a roughly north to south alignment, has reduced the maximum number of turbines within the Mona Array Area (from 107 to 96), and committed to increase the minimum spacing between turbines (from 1 km to 1.4 km) to help facilitate co-existence of commercial fisheries activity within the Mona Array Area. These measures are set out in the Outline fisheries liaison and Coexistence Plan.	
				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_069_208_010623	S42	Email	11.8.2.64. Once clarified, the Isle of Man Government requests an indication as to how 5-20% of lost revenue for the Manx scallop fleet will be compensated over the four year period?	No compensation/additional mitigation is proposed for significance of effects that are not deemed significant in EIA terms. However, it should be recognised that a suite of embedded mitigation will be implemented related to minimising all commercial fisheries impacts. All mitigation and monitoring commitments are set out within the relevant Environmental Statement chapters and mitigation and monitoring schedule.	No
				The low magnitude of impact definition within the commercial fisheries chapter of the Environmental Statement has been updated to cover a potential loss of revenue of between 5-10%, while the medium magnitude of impact definition now covers a potential loss of revenue of between 11-50%. Estimated percentage reduction in annual value of landings valuations are informed by expert judgement that is based on data analysis, stakeholder feedback, the array layouts presented and how these may affect fishing activity.	
Mon_069_209_010623	S42	Email	'11.8.3.11Displacement of other fishing vessels from the Mona Array Area into areas where Isle of Man scallop vessels fish could cause conflict between these different receptor groups. However, displacement of non-UK vessels, such as Belgian beam trawl vessels or Irish scallop vessels, into the Manx Territorial Sea (within 12nm) within the 36E5 will not occur, as non-UK vessels do not have access to this area, under the London Fisheries Convention 1964. Displacement of Scottish west coast scallop vessels and other scallopers into the Manx Territorial Sea is also limited, as under the Isle of Man Scallop LTMP, access to king scallop dredging is limited to vessels under 221kW, unless they possess Grandfather Rights. These Grandfather Rights will be terminated by November 2024 under the LTMP.' This is correct, however, as below, has it been ascertained how many of those vessels do have Manx scallop entitlements? Therefore this is the actual potential displacement effect and should be indicated and quantified.	The Applicant has requested a list of vessels with Grandfather Rights from the Isle of Man Government. Scottish scallopers have informed the Project via consultation that they do not fish in Isle of Man waters.	No
Mon_069_210_010623	S42	Email	'Only vessels which possess a UK and Isle of Man fishing vessel licence with scallop entitlement, may fish for scallops within Manx Territorial waters. In light of this, and the discrete spatial areas of exclusion during construction, the displacement of fishing activity during construction therefore results in a predicted loss of <5%	No compensation/additional mitigation is proposed for significance of effects that are not deemed significant in EIA terms. However, it should be recognised that a suite of	No



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			of this receptor's annual value of landings. 'In addition, and as posed above, How will this 5% (or up to 20% at 11.8.2.2), be compensated over 4 years, given the recent hardships experienced by industry. It cannot simply be written off as trivial, and assumed to be absorbed by Manx fishermen. The Isle of Man Government requests an indication as to how 5 -20% of lost revenue for the Manx scallop fleet will be compensated over the four year period?	embedded mitigation will be implemented related to minimising all commercial fisheries impacts. All mitigation and monitoring commitments are set out within the relevant Environmental Statement chapters and mitigation and monitoring schedule.	
				The low magnitude of impact definition within the commercial fisheries chapter of the Environmental Statement has been updated to cover a potential loss of revenue of between 5-10%, while the medium magnitude of impact definition now covers a potential loss of revenue of between 11-50%. Estimated percentage reduction in annual value of landings valuations are informed by expert judgement that is based on data analysis, stakeholder feedback, the array layouts presented and how these may affect fishing activity.	
Mon_069_211_010623	S42	Email	11.8.8Scallop vessels –Isle of Man'11.8.8.11The impact is predicted to be of local spatial extent, short to medium term duration and intermittent. It is predicted that the impact will affect the receptor directly, but only be of minor benefit, as it is judged that any such support by this receptor group would create a value equivalent to between 5-20% of the receptor group's annual value of landings. The magnitude is therefore, considered to be low. 'Is it coincidence that the 5-20% estimate is the same for both the potential coast and potential benefit to Manx scallop vessels? Does this value apply to all vessels equally?	This comment has been acknowledged. The significance of effect for this impact within the commercial fisheries chapter of the Environmental Statement has been updated to negligible, instead of minor beneficial. The potential beneficial impact would not affect all vessels equally within this receptor group, as only several vessels could benefit. Therefore, the magnitude is likely to be negligible for a whole receptor group, even if low beneficial for one or two vessels.	
Mon_069_212_010623	S42	Email	The Isle of Man Government would like to see how both the potential negative cost effect of displacement noted above (eg. 11.8.2.21 -22 and 11.8.2.63) and the potential benefit noted here have been calculated.	The definitions of magnitude of impact are outlined within Table 6.10 of the commercial fisheries chapter of the Environmental Statement. Estimated percentage reduction in annual value of landings valuations are informed by expert judgement that is based on data analysis, stakeholder feedback, the array layouts presented and how these may affect fishing activity.	No
Mon_069_213_010623	S42	Email	·And requests clarification of whether it's 5% or 20%, or how this will be resolved, and;		No
Mon_069_214_010623	S42	Email	·questions whether either of these values is actually 'low' in the context of recent fishing industry financial pressures and, for example, bp/EnBW shareholder expectations of corporate performance.	within the commercial fisheries chapter of the Environmental Statement to cover a potential loss of revenue of between 5-10%, while the medium magnitude of impact definition now covers a potential loss of revenue of between 11-50%. Estimated percentage reduction in annual value of landings valuations are informed by expert judgement that is based on data analysis, stakeholder feedback, the array layouts presented and how these may affect fishing activity.	No
				The magnitude of impact definitions have purposely used a range, i.e. between 5-10% of potential loss of revenue, as it is recognised that the estimates are based on data with various limitations and assumptions (which are outlined in the commercial fisheries technical annex of the Environmental Statement).	
Mon_069_215_010623	S42	Email	Table 11.32: Monitoring commitments. Environmental effect - Potential snagging risk. Effects of the operational phase on fishing activity and subsequent value. Monitoring Commitment - Monitoring of the cables and their burial status to reduce snagging risk. Annual reviews for the first five years of the operational phase, to review	Any substantive changes found in the annual reviews would be discussed via a commercial fisheries working group. This hasn't been detailed within the Outline Fisheries	Yes



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			VMS data and landings data to identify whether there are any changes to fishing activity within the Morgan Array Area. Means of implementation - Expected to be a condition of the deemed Marine Licence (dML) within the DCO. Commitment to undertake this to be included within the outline Fisheries Liaison and Co-existence Plan, which will be submitted as part of the DCO application.	Liaison and Co-existence Plan, however, the commitment to the annual reviews for the first 5 years of the operations and maintenance phase and investigating creating a commercial fisheries working group are secured.	
			What is the expected outcome if monitoring shows a change?		
Mon_069_217_010623	S42	Email	11.9 Cumulative effect assessment methodology and Figure 11.7-Need to include the Ørsted and Crogga areas in Manx waters to some extent.	The Scoping Report for the Mooir Vannin Offshore Wind Farm has been submitted to Isle of Man Government and is available on Orsted's website. As a Scoping Report has been submitted, this project has been included as a Tier 2 project within the cumulative effects assessment section of the commercial fisheries chapter of the Environmental Statement.	No
Mon_069_219_010623	S42	Email	The total area from the three array areas alone is approximately 897km2. This cumulative loss of area could affect an area from which a moderate proportion (20-50%) of this commercial fisheries receptor's annual value of landings is caught.'+ Table 11.35	Engagement has continued with Commercial Fisheries stakeholders since 2022 to discuss these key issues. Meetings were undertaken in September 2023 to discuss the response to the statutory consultation and to present a number of project changes and commitments being made by the Applicant to reduce potential impacts on commercial fisheries activities. The project changes and commitments and how they may facilitate co-existence and co-location are outlined within the commercial fisheries chapter of the Environmental Statement and are committed to within the Coutline Fisheries Liaison Plan. The CEA section within the commercial fisheries chapter of the Environmental Statement has been updated to reflect such changes.	No
Mon_069_220_010623	S42	Email	As above: Need to include the Ørsted and Crogga areas. Cumulative + displacement effects could affect Manx vessels, as acknowledged already for the 4 year construction phase (-5 to 20% of annual income). Comprehensive cumulative effects can only presumably enhance this effect?	The Scoping report for the Isle of Man Offshore Wind Farm (now called Mooir Vannin Offshore Wind Farm) has been submitted to Isle of Man Government. As a Scoping chapter has been submitted, this project has been included as a Tier 2 project within the cumulative effects assessment section of Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement.	
Mon_069_221_010623	S42	Email	Table 11.47: Monitoring commitments - Effects of the operational phase on fishing activity and subsequent value. Environmental effect Monitoring commitment - Annual reviews for the first five years of the operational phase, to review VMS data and landings data to identify whether there are any changes to fishing activity within the Morgan Array Area. Means of implementation - Commitment to undertake this to be included within the outline Fisheries Liaison and Co-existence Plan, which will be submitted as part of the DCO application. What is the expected outcome if monitoring shows a change?	Any substantive changes found in the annual reviews would be discussed via a commercial fisheries working group. This hasn't been detailed within the Outline Fisheries Liaison and Co-existence Plan, however, the commitment to the annual reviews for the first 5 years of the operations and maintenance phase and investigating creating a commercial fisheries working group are secured.	Yes
Mon_069_222_010623	S42	Email	What is the expected outcome if monitoring shows a change?	Flagged by MarineSpace, bp to advise on approach.	Yes
Mon_069_223_010623	S42	Email	11.11 Transboundary effects 11.11.1.1 A screening of transboundary impacts has been carried out and any potential for significant transboundary effects with regard to commercial fisheries from the Mona Offshore Wind Project upon the interests of other states has been assessed as part of this PEIR.	The Applicant has requested a list of vessels with Grandfather Rights from the Isle of Man Government. Scottish scallopers have informed the Project via consultation that they do not fish in Isle of Man waters.	No
Mon_069_224_010623	S42	Email	·'Displacement of fishing vessels could occur into non-UK waters, such as the Isle of Man waters. However, it is not anticipated that there would be a significant displacement of fishing vessels into these EEZs, based on the established fishing grounds of the receptor groups within this assessment. For example, scallop vessels may be displaced into Isle of Man waters from the Morgan Generation Assets, but due to the extensive king scallop	The definitions of magnitude of impact are outlined within Table 6.10 of the commercial fisheries chapter of the Environmental Statement. Estimated percentage reduction in annual value of landings valuations are informed by expert judgement that is based on data analysis,	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			grounds within the Irish Sea and the current management measures in place for this fishery in the Isle of Man, this impact is concluded as not significant.	stakeholder feedback, the array layouts presented and how these may affect fishing activity.	
Mon_069_225_010623	S42	Email	The Manx territorial sea is not an EEZ.As noted elsewhere, the comprehensive Long Term Management Plan1for scallops has been developed around a bio-economic model that has attempted to match available resource with economic return (based on access for vessels which have a track record and economic link to the fishery). As such, any displacement of vessels into Manx waters, especially to grounds with higher scallop densities (such a Manx grounds) may jeopardize the objectives of this LTMP.	The Applicant has requested a list of vessels with Grandfather Rights from the Isle of Man Government. Scottish scallopers have informed the Project via consultation that they do not fish in Isle of Man waters.	No
Mon_069_226_010623	S42	Email	The Isle of Man Government therefore requests further consideration of the Scallop LTMP, and the spatial fishing effort data provided above, in the context of this development and the conclusions drawn here.	The commercial fisheries chapter of the Environmental Statement further considers the scallop Long Term Management Plan (LTMP)	No
Mon_069_227_010623	S42	Email	Queen scallop grounds are more discrete, however there are strict management measures in place which also control this fishery in Isle of Man waters, which would limit the displacement of scallop vessels targeting queen scallops into Isle of Man waters. Therefore, the potential transboundary impact of effects on displacement of fishing vessels is concluded to be not significant in EIA terms. '	Volume 2, Chapter 6, Commercial Fisheries of the Environmental Statement describes the commitments made by the Applicant to minimise the potential for displacement of commercial fishing stakeholders.	Yes
Mon_069_228_010623	S42	Email	There is an assumption of no long term effect on the important queen scallop area to the west and north-west of the array area, but without monitoring how will this be confirmed? What is the expected outcome if monitoring shows a change?	Any substantive changes found in the annual reviews would be discussed via a commercial fisheries working group. This hasn't been detailed within the Outline Fisheries Liaison and Co-existence Plan, however, the commitment to the annual reviews for the first 5 years of the operations and maintenance phase and investigating creating a commercial fisheries working group are secured.	Yes
Mon_069_317_010623	S42	Email	Commercial Fisheries 1.6.2.4 It is proposed that transboundary impacts to commercial fisheries are screened into the EIA process. NOTED. This comment is also relevant to those made in respect of the Commercial Fisheries chapters.	The Applicant notes your response.	No
Mon_069_318_010623	S42	Email	Climate Change 1.8.5.3 It is proposed that transboundary impacts on climate change are screened into the EIA process. NOTED. This comment is also relevant to those made in respect of the Commercial Fisheries chapters.	The Applicant notes your response.	No
Mon_071_025_020623	S42	Email	Further displacement of fisheries and established co-existence relationships	Volume 2, Chapter 6, Commercial Fisheries of the Environmental Statement describes the commitments made by the Applicant to minimise the potential for displacement of commercial fishing stakeholders. The Applicant has submitted an outline fisheries liaison and co-existence plan alongside the application for development consent.	Yes
Mon_072_115_010623	S47	Email	Commercial fisheries operators also share many of the same concerns as Stena Line. These include the concern for spatial squeeze on fishing vessels due to changes in ferry routeing as a result of the footprint of the Wind Farms (see Mona PEIR, Chapter 11, section 11.1, Morgan PEIR Chapter 11, pages 39-40).	This has been acknowledged within the commercial fisheries chapter of the Environmental Statement and has been considered under section 6.12, inter-related effects.	Yes
Mon_086_001_050623	S47	Email	The National Federation of Fishermen's Organisation (NFFO) represents the interests of over 500 commercial fishing businesses in England and Wales. The Welsh Fishermen's Association (WFA) represents over 200 commercial fishing businesses in Wales. This response represents views from both the NFFO and WFA members. We are responding to this consultation as we feel that there are potential impacts to the commercial fisheries in the proposed area	Noted, responses provided immediately below.	Yes
Mon_086_002_050623	S47	Email	Commercial fisheries have existed in the proposed region for generations and are already faced with extensive spatial restrictions such as existing and proposed offshore wind developments, Marine Protected Areas and legislative restrictions in the region. The area is economically important to fishing fleets from all the devolved UK administrations, with a variety of gear types being deployed, both static and mobile. Further displacement of commercial fishing in the region will result in economic harm, through loss of earnings from the ground and additional operating costs due to increased steaming times during construction and operation of the project.	Displacement into other areas and temporary increases in steaming distances of fishing vessels as a result of the Mona Offshore Wind Project has been assessed for all receptor groups within section 6.8.3 and 6.8.5 of the commercial fisheries chapter of the Environmental Statement. The cumulative effects assessment, within section 6.10 of the commercial fisheries chapter of the Environmental Statement, takes into account impacts	Yes



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_086_009_050623	S47	Email	Commercial Fisheries The following comments are in reference to the Commercial Fisheries chapter of the PEIR, Volume 2, Chapter 11 and the Commercial Fisheries Technical Report, Volume 6, Annex 11.1. This chapter characterises the commercial fishing industry well and effort has been made to describe the fisheries using a variety of sources. However, there remain issues with how those data have been interpreted	associated with the Mona Offshore Wind Project together with other projects, plans and Marine Protected Areas. Limitations with data sources used to inform the commercial fisheries assessment have been discussed fully within the Commercial fisheries technical report of the Environmental Statement.	
			and used to assess the impacts to the diverse fishing fleets that are the current users of the area.	Further description of data limitations has been added where deemed appropriate, for example, the inclusion of cross-references to data limitations where the datasets are analysed.	
Mon_086_010_050623	S47	Email	We agree with the impacts that have been scoped in for the assessment but disagree that the impact of having to steam to new fishing areas has been scoped out for the PEIR. The justification for this is that there will only be localised impacts immediately surrounding structures and associated safety zones. Whilst this is technically correct, it does not account for the dominant gear types within the array area (as defined in Annex 11.1) being mobile gear. There is minimal evidence of mobile gear operating within other wind farm array areas. This will be compounded by the extensive, parallel offshore wind developments in the region. The same is observed with regards to static gear along the export cable corridor, specifically the whelk fleet. Therefore, it must be assumed that both mobile and static gear fisheries will have to steam to new fishing grounds, this significant impact needs to be assessed as part of the EIA.	the construction and decommissioning phases of the Mona Offshore Wind Project, within section 6.8.5 of the commercial fisheries chapter of the Environmental Statement.	Yes
				offshore cable corridor during operation (as also confirmed by stakeholders via Project-specific consultation). Once the wind farm is operational, fishing vessels will be able to transit through the array area and across the cable corridor.	
Mon_086_011_050623	S47	Email	It is welcomed that fisheries exclusion during construction will follow rolling closures as opposed to whole site closures. Liaison with all fishing sectors that operate in the area, including from the different nations, will be essential in ensuring minimal disruption to fishing practices and a mechanism for this needs including in the Fisheries Liaison and Co-Existence Plan. Whilst there is a commitment to follow FLOWW Guidelines (2014) for liaison and disruption agreements, these are under review, and we would like to see this acknowledged within the PEIR and a commitment made to follow the most up to date guidelines when published.	Updated FLOWW Guidelines for liaison and disruption agreements are under review and have not yet been published, this has been acknowledged within the commercial fisheries chapter of the Environmental Statement.	Yes
Mon_086_012_050623	S47	Email	We feel that the assumption that displacement effects during construction for all the different fishing gear sectors will be "negligible" is vastly overoptimistic. The only justification for this seems to be that fishers can disperse into other areas. This is not the case, especially in regions such as this, with extensive existing offshore developments, alongside legislative and conservation restrictions and two other wind farm developments being constructed. Displacing a diverse fishing fleet into an already crowded marine space will have an impact on those fishing businesses that is likely to be far from negligible.		Yes
Mon_086_013_050623	S47	Email	For the static gear sector, operating in the east of the development area, an estimated economic loss to businesses of 5-20% is considered as low magnitude and no mitigation suggested, this again contravenes the NW Marine Plan NW-FISH-2, to avoid, minimise and mitigate with regards to commercial fisheries. Up to a 20% loss of revenue with no mitigation is not acceptable and will place those fishing businesses at risk. The same can be observed for the scallop fleet operating in the west of the development area, forecasting a 5-20% loss of revenue due to the development with no mitigation offered to offset these losses. A monitoring plan to monitor the scallop fishing fleet over a five-year period does not fall into any of the "Avoid, Minimise, Mitigate" categories. What are the protocols to be followed if an effect is observed? The assessment fails to capture the importance of the export cable corridor area to the Welsh whelk fleet, the majority of which are not reflected in the PEIR. The displacement effect on this fleet has not been assessed adequately in this chapter along with the ecological effects of the export cable installation and operation on whelks lacking in the Fish and Ecology chapter.		Yes



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				impact definition now covers a potential loss of revenue of between 11-50%. Estimated percentage reduction in annual value of landings valuations are informed by expert judgement that is based on data analysis, stakeholder feedback, the array layouts presented and how these may affect fishing activity.	
				The magnitude of impact definitions have purposely used a range, i.e. between 5-10% of potential loss of revenue, as it is recognised that the estimates are based on data with various limitations and assumptions (which are outlined in the commercial fisheries technical annex of the Environmental Statement).	
				Following review of the monitoring data, any changes will need to be discussed with fisheries stakeholders and relevant outcomes to be agreed depending on the degree of change.	
				Welsh whelk fleet in cable corridor - it is recognised that there is a lack of data available for inshore fleets, and supplementary data has been obtained where possible to inform the assessment. The WFA have attended fisheries stakeholder meetings and individual operators in Conwy and feedback has been used to inform the assessment.	
Mon_086_014_050623	S47	Email	The assumption that fishing can take place elsewhere or within the development post-construction is the only justification given to assess these losses as negligible. The only mitigation for the scallop fleets is "potentially" altering the array design to allow for towing and increased turbine spacing, at this stage this does not commit to doing so, only as an option that may be explored. There is no strategy or attempt for this development to co-exist with the current users of the area. In fact, for example, a commitment to a cable burial depth of only 0.5 m and addition of rock armour where necessary will actively discourage use of the area by the scallop fleet due to snagging and safety concerns, whilst also disrupting the important queen scallop nursery grounds through change of habitat type. Commitment to monitoring cables is welcomed, however details of frequency and scope of the monitoring, and dissemination of monitoring results is lacking in detail.	Close engagement has continued with Commercial Fisheries stakeholders in order to discuss these key issues. Meetings were undertaken in September 2023 to update on the latest array layouts, which included the commitment to reduce the number of turbines within the Mona Array Area from 107 to 96 and to increase the minimum spacing between turbines from 1 km to 1.4 km, and to discuss how these updated array layouts may facilitate co-existence. This is detailed within the Mona Layout Principles Statement within the Environmental Statement.	Yes
				The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application. Mitigation and monitoring commitments are set out within the environmental statement chapters and mitigation and monitoring schedule.	
Mon_086_015_050623	S47	Email	Use of non-site-specific studies (11.8.2.40) should be done with caution. The study presented here was site specific, and based in a region that was characterised by a very different benthic environment and regional fishery. Co-existence is site-specific and should not be assumed as environmental, fisheries type and drivers are all factors that influence whether co-existence can be achieved post construction.	This comment has been acknowledged. The potential for coexistence for each receptor group has been assessed in more detail within the relevant assessments in the commercial fisheries chapter of the Environmental Statement.	Yes



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Mon_086_016_050623	S47	Email	The commercial fisheries in the region will be expected to see a vastly changing landscape through the lifespan of the Morgan project. The spatial squeeze on fisheries due to offshore developments in the region is already extensive in the Eastern Irish Sea and facing three developments running in parallel. There is also the likelihood of further restrictions with regards to the potential ban on all mobile gear within MCZs. There are also factors associated with the renegotiation of the Trade and Cooperation Agreement that will affect opportunities in the region. Whilst these elements are acknowledged in the PEIR as possible factors, they are not accounted for in the assessments.	Spatial squeeze on fisheries due to offshore developments in the Eastern Irish Sea, including the possibility of further restrictions with regards to the potential ban on all mobile gear within MCZs, have been assessed as part of the cumulative effects assessment, within section 6.10 of the commercial fisheries chapter of the Environmental Statement. The renegotiation of the Trade and Cooperation Agreement and how that may affect opportunities in the region is considered in the future baseline, section 1.5 of the of the	Yes
				commercial fisheries technical annex of the Environmental Statement, which is used to inform the assessment of significant effects within the commercial fisheries chapter of the Environmental Statement.	
Mon_086_017_050623	S47	Email	It is recognised that the PEIR attempts to characterise a commercial fisheries baseline by analysing many different data sources to describe and analyse the commercial fisheries impact, including stakeholder expertise. The limitations of the data are well understood and described, with confidence levels assigned to the different data sources. However, the assumptions made, and subsequent impacts assessed from these data, do not seem to be influenced by their pedigree or the confidence levels assigned, leading to a "minor/negligible" or "no significant effect" in all cases.	Limitations of all utilised datasets have been acknowledged, as outlined in the commercial fisheries technical report and commercial fisheries chapter of the Environmental Statement.	Yes
Mon_086_018_050623	S47	Email	In fisheries management, a precautionary principle is employed where there is uncertainty or a paucity of relevant data. This does not seem to be the case for impact assessments. Limitations of data are acknowledged but do not seem to influence the outcomes of assessed impacts, a flaw in the methodological design and interpretation.	Limitations of all utilised datasets have been acknowledged, as outlined in the commercial fisheries technical report and commercial fisheries chapter of the Environmental Statement.	Yes
Mon_086_019_050623	S47	Email	Whilst we appreciate the difficulties in assessing impacts with limited data sources, we feel that the analysis is affected these shortcomings, and this needs to be accounted for in the methodology. The development of the Morgan Offshore Wind farm will have an impact on the diverse fishing fleets operating in the area, this PEIR underestimates these impacts on nearly every receptor assessed.	Limitations of all utilised datasets have been acknowledged, as outlined in the commercial fisheries technical report and commercial fisheries chapter of the Environmental Statement.	Yes
Mon_114_001_260523	S47	Feedback form	Inshore fisheries - Gillnetting, Mussels, bass. REDACTED - REDACTED Fisheries disruption through construction and impact on species WWIFCA engagement. Meeting to discuss? April-Sept. No cockles to Nov REDACTED. REDACTED Construction. Barrow catches still good. DISTURBANCE. Q1 - Don't want to loose fishery as a resulf of w turbines. Have not been engaged. EMailed REDACTED a month ago and no reply. Group of 5 fishermen 1.1-1.4 Mussels on the wall. Liverpool - Burbo Bank and Burbo Bank extension - we felt the frills of the piles and it impacts the mussels and meant we had no/limited catch. Impact of puling and under water noise from OF turbines on inshore fisheries - is this covered in the Transmission PEIR? Is it covered int he Morgan/Morecambe Gen PEIR? Interested to understand the impact on inshore fisheries stocks.	A cumulative assessment of the impact of piling on fish factoring in the Mona Offshore Wind Project, Morgan Generation Assets and Morecambe Generation Assets is presented in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement.	No
Mon_121_001_050723	S47	Email	I'm responding to the consultation extension you posted to the Northern Ireland Fish Producers' Organisation, thank you for sending it. We have 2 significant concerns –	The Applicant notes your response.	No
Mon_121_002_050723	S47	Email	Have you any evidence to produce that supports your assertation that measures such as "piling soft-start" and "ramp up" has a negligible adverse significance?	Additional data sources have been incorporated where available into Volume 2, chapter 3: Fish and shellfish	No



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				ecology of the Environmental Statement. It is acknowledged that soft start and ramp-up measures will benefit some fish species and not others.	
Mon_121_003_050723	S47	Email	The reference to spawning herring is disingenuous. Avoiding the greatest impact is not the same as avoiding a significant adverse impact. Nor is it appropriate to attempt to gloss over significant impacts by claiming to investigate measures you hope can provide mitigation. You either have an effective mitigation plan or you don't. If it is under investigation that means you don't have an answer yet and you may not be able to achieve one. The report should reflect that more honestly.	The project design envelope has been refined since submission of the PEIR, and updated sound modelling has been undertaken. The assessment Volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement has been revisited. The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed project design information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Project refinements and potential mitigation options will be considered within the Underwater Sound Management Strategy (UWSMS), an outline of which has been submitted with the application for consent. The UWSMS will investigate options to manage underwater sound levels in order to reduce the magnitude for the project alone to a non significant effect. The UWSMS will be updated post-application, discussed and agreed with stakeholders. The UWSMS is secured in the deemed marine licence in Schedule 14 of the draft DCO	
Mon_121_004_050723	S47	Email	That drilling and vibration has an impact on crustaceans is well documented. What mitigation measures do you propose to ensure your activity does not harm the stocks? It is simply incorrect to assume that timing of installation is the only relevant factor. How installation impacts shellfish is a much more important question.	The project design envelope has been refined since submission of the PEIR, and therefore the maximum design scenario. The assessment has been reviewed and updated where appropriate based upon the refined design parameters. Where appropriate and proportionate, mitigation measures and/or monitoring have been recommended, based upon the revised assessment outcomes. Assessment of underwater noise on crustacean and fish stocks has been assessed in volume 2, chapter 3: Fish and shellfish ecology of the Environmental Statement	Yes
Mon_121_005_050723	S47	Email	NIFPO does not consider that development of a Co-Existence and Liaison plan will provide any assurance that there will be negligible or minor adverse impacts. There is simply no evidence this will be the case. A commitment to explore potential for coexistence is not the same as an actual effective mitigation measure.	The Applicant is taking and will continue to take steps to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application (Document Reference: J13), which displays the various fisheries mitigation and management measures the Applicant has committed to.	Yes
Mon_121_006_050723	S47	Email	What examples of further mitigation, with regard to fishing, do you refer to in the Commercial Fisheries section of the PEIR?	The Mitigation and Monitoring Schedule (Document Reference J10) has been submitted as part of the Mona Offshore Wind Project application.	No
Mon_121_007_050723	S47	Email	You assume displacement will only occur during the construction. It is the fishing industry's experience that displacement for trawling and dredging is usually permanent. Why does the report not acknowledge this?	The impact of displacement during all project phases (construction, operations and maintenance, and decommissioning) is assessed within Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement.	No





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Mon_121_008_050723	S47	Email	To assume operational range is the most important deciding factor when assessing the impact of displacement is naïve. Availability of alternate fishing opportunity and the impact of increased effort in other fisheries are much more important considerations. Just because a vessel can sail somewhere else doesn't mean that it will have access to fishing opportunity when it gets there.	As discussed with commercial fisheries stakeholders throughout the pre-application process, all aspects of the sensitivity of receptors have been taken into account in the impact assessment within Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement.	No
Mon_121_009_050723	S47	Email	The report claims a number of minor or negligible impacts when that simply isn't accurate. On behalf of the fishing industry I request an urgent meeting to discuss the report.	Consultation has been undertaken with commercial fishing organisations. These have included fish and shellfish ecology specialists to ensure alignment between the commercial fisheries and fish and shellfish ecology baselines and assessments, including consideration of commercial importance of IEFs when determination valuation of the relevant fish and shellfish ecology receptors. The project design envelope has also been refined since submission of the PEIR. The assessment has been reviewed and updated where appropriate based upon the refined design parameters and following feedback from statutory and non-statutory bodies. The Applicant considers the assessment to represent and assess the impacts in proportion to the project design.	No
Mon_183_004_110523	S47	Consult Online	Expect resistance from local fisherman who will expect compensation, even though fishing industry is not prolific in the area.	Impacts on fishing activities are addressed within Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement and Volume 2, Chapter 10: Other sea users of the Environmental Statement. Consultation with fisheries organisations has continued throughout the pre-application process.	No



D.25.13 Shipping and navigation table of responses



Table D.25. 13: Shipping and navigation table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_021_001_020523	S47	Email	States an objection to Mona Offshore Wind Project, Morgan Gen, Morecombe Gen, and Morgan and Morecombe transmission assets. My objection regarding the adverse impacts of the above proposed developments on navigation refers in particular to the Isle of Man's lifeline ferry services. The Planning Inspectorate's website for Morgan Offshore Generation Assets, 10 October 2022, records the following communication from the Maritime and Coastguard Agency. "I want to raise an early concern that (1) the three projects present concerns to safe navigation in the area	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and Environmental Statement Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_021_002_020523	S47	Email	States an objection to Mona Offshore Wind Project, Morgan Gen, Morecombe Gen, and Morgan and Morecombe transmission assets. My objection regarding the adverse impacts of the above proposed developments on navigation refers in particular to the Isle of Man's lifeline ferry services. The Planning Inspectorate's website for Morgan Offshore Generation Assets, 10 October 2022, records the following communication from the Maritime and Coastguard Agency. "I want to raise an early concern that (2) I believe that separate planning applications would not provide a full representation of the impacts because of the risks they present cumulatively which probably most concern the MCA and other navigational stakeholders."	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_021_003_020523	S47	Email	The documents for the current proposals appear to show that the geographical extents of the schemes have not materially changed since the MCA expressed their concerns. Despite communications between the shipping interests and developers, I understand that the boundaries for the areas proposed for development remain a matter of concern for shipping operators, including the Isle of Man Steam Packet Company. Currently, there is free navigation over the whole area of the proposed wind farms. The custodian of the sea bed, the Crown Estate, has issued licences intended to allow developers to close off areas of the seas surface to navigation. Yet, it is the shipping interests who have been expected to justify their requirements for safe navigation. For an equitable balance between wind farms and shipping operation, it is now appropriate and not unreasonable to request that the developers justify the development areas actually needed. It is not adequate that they make reference to the development areas as "maximum."	within the NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_021_004_020523	S47	Email	It appears that the geographical extents for licence and development were based initially on nominal capacity densities (MW/km^2) for which there is	The Mona, Morgan and Morecambe Projects have committed to amending the boundary of their respective project array areas in order to reduce the	Yes



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			extensive data for the British Isles and Europe. Subsequently, with the increasing data now available, the developers should now be able to provide more detail of their design parameters and proposals. Unfortunately, past experience elsewhere was that developers claimed that there were too many variables under consideration. Was their reluctance to provide details until as late as possible intended to put objectors at a disadvantage?	potential impacts on shipping and navigation. These have been assessed within the NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_031_001_090523	S47	Email	We are residents of the Isle of Man and on looking at the map on the card immediately became concerned as the two ports to the east of the Isle of Man which are used by The Isle of Man Steam Packet Company [IOMSPC] are not shown. The immediate implication is that you do not understand the importance to the Isle of Man of the routes to both Heysham and Liverpool. Both shipping routes, used for a very long time by the IOMSPC, are a vital lifeline. Anything which disrupts the regular sailings has massive implications in terms of food supplies and other freight to and from the Island. There is also the other important role provided by the IOMSPC, that of transferring people to appointments/treatment in UK hospitals where the patient is unable to fly. The IOMSPC [founded in 1830] has various longstanding routes used to both Heysham and Liverpool, each depending on prevailing weather conditions. We believe that the consequences of development at the proposed scale will potentially result in longer sailing times and, to ensure avoidance with the wind farms, will result in more frequent cancellations. We are not opposed to the principle of wind farm developments but are totally opposed to any such developments which will adversely impact on the services provided by the Ilse of Man Steam Packet Company. We feel sure that the IOMSPC will be submitting their own response and are confident that it will be more detailed than the above.	the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the	
Mon_036_001_160523	S47	Email	We would initially state that we support the development of sustainable energy generation, to mitigate the effects of Climate Change. However, these developments need to be planned carefully, with due consideration on its impact on the Isle of Man. As an Island, we are reliant on our sea links for both passenger travel and for all our freight, including the majority of the food that we consume. Any impact on the sea links, however small, could have a major impact on the Isle of Man, particularly during times of inclement sea conditions. In fact, the island already regularly experiences significant disruptions during the winter, including depleted supermarket food shelves, when the boats cannot sail due to poor weather, and this issue could be exasperated by narrowing available sea routes. The following image, from the consultation portals, provides the overall layout of the proposed developments, and itis clear, even without technical knowledge, that the location of these proposals has potential to impact on the important sea links that connect the Isle of Man to the UK. As we are not experts in maritime matters, we would therefore refer you to the observations of the Isle of Man Steam Packet Company, who have responsibility to maintain the important sea links that the Island is dependent on;https://www.bbc.co.uk/news/world-europe-isle-of-man-63588474https://www.steam-packet.com/information/news/2022/Nov/Potential_wind_farm_projects	cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications	
Mon_036_002_160523	S47	Email	The following is an extract from the article on the Steam Packet website; KEY CONCERNS •The safety of navigation for ships when sailing through the wind farm corridors.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona	Yes



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				array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_036_002_160523	S47	Email	*KEY CONCERNS *The lack of open sea room for navigating in rough weather is likely to increase risk of cancellations on the island's lifeline routes. This will affect passengers, hauliers and the wider population of the Isle of Man through delays and disruptions to shipments of essential goods.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_036_003_160523	S47	Email	KEY CONCERNS •The consequences of extra sailing distance imposed on lifeline routes, requiring more fuel, leading to increased fuel costs and greater CO2 emissions. Protect lifeline services steam-packet.com	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_036_004_160523	S47	Email	Please consider the cumulative effects of all Irish Sea wind farm projects on the Island's lifeline routes. Serving our island community since 1830 Map is for illustrative purposes only and is not drawn to scale. The following image illustrates the potential conflict between the current ferry routes between the Island and Heysham & Liverpool, neither of which were identified on the maps on the consultation portals; Whilst separate consultations are being held for the four separate proposals, it is clear that all four should be considered as one, to assess their overall	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and	Yes



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			impact. As the proposals are only at consultation stage, we hope and trust that the concerns of the Steam Packet Company are taken on board fully and suitable solutions found, to ensure that the people of the Isle of Man are not impacted negatively by these proposals.	the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	· · · · · · · · · · · · · · · · · · ·
Mon_037_001_180523	S47	Email	We would like to be very clear that Chamber has no objections, indeed no comment, in relation to the policy of windfarm development. Our submission to you is based on the economic impact that will result from the proposed UK offshore windfarm (Morgan & Mona) which will have direct impact on our long-established lifeline sea routes with the UK (Heysham & Liverpool). The location of the planned wind farms will add to journey times and reduce port turnaround times for urgent freight but will more worryingly have a severe effect on the use of adverse weather routes which will lead to more cancellations resulting in direct impact on our Island's vital freight deliveries and visitors. The island is highly reliant on same day fresh foods and imports over 80% of food consumed. You will understand our position in protecting these routes for the IOM and its community who depend on these routes for their daily livelihood needs and travel. The Isle of Man Chamber of Commerce has no objections to any windfarm development obtaining planning approvals-PROVIDED that on its own, or cumulatively our lifeline air and sea routes are unobstructed. We have gathered comments from our Sector Leads in the most effected industries to make it clear the impact the proposed windfarm development will have.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_037_002_180523	S47	Email	Nick Gibbs, Engineering Director at Strix Ltd and the Sector Lead for our STEM members has given the following statement: 'The Engineering and Manufacturing businesses on the Island are very concerned about any developments that may disrupt the reliability and regularity of the logistics links to the Isle of Man. These links are an essential element of the supply chain in both directions for our businesses, for incoming materials and out flow of products to our customers. In today's economic environment many of our businesses need to operate as lean as possible with regard to holding materials and stocks as well as needing to offer just-in-time delivery performance to our customers. Disruption to the supply chain will very quickly have a detrimental effect on our ability to function which will then directly impact our performance to our customers. Repeated and ongoing customer impact can be very damaging to reputation and future prospects. The last thing we need for business sustainability is to suffer the risk of increased supply chain disruption. Isolated examples of disruption already exist today from natural causes such as storms at sea. When the ferry service is cancelled due to bad weather our materials and products become stalled and priority on the next sailings is given to perishables, food and medical supplies over our supplies. This can quickly escalate to a crisis if sailings do not resume to normal in a reasonable period of time as the backlog will grow.	cancellations to lifeline ferry services. Following the PEIR and \$42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are	
Mon_037_003_180523	S47	Email	REDACTED, Managing Director of Robinsons and Sector Lead for our Local Economy Forum (large locally owned and operated business) has commented: The reliability and cost of the freight service to the Isle of Man is critical to the local retail and hospitality sector, the Group supports projects that deliver economic growth but in this instance would seek detailed reassurances that	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42	Yes





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			freight services would not be affected in either its timing's or burdened by extra costs. The Isle of Man retail sector, especially food retailers depend on reliable timed deliveries and any deterioration in the service could damage the prospects for investment in the sector and affect we believe the quality of life on the Isle of Man'.		
Mon_037_004_180523	S47	Email	REDACTED, CEO of Palace Holdings and Sector Lead for our Visitor Economy Members has provided the following statement: The Isle of Man's visitor industry is wholly dependent on reliable air and sea routes for its guests to travel to the Island. About 60% percent of our tourists use the sea links serviced by Steam Packet. It is obvious that any disruption or reduction of ferry services will have a material impact on our tourism sector. Even more so now the number of air routes to and from the UK has diminished. A reduced number of visitors to the Isle of Man due to cancelled, delayed or reduced number of sailings will also have a significant effect on our wider local economy. Reduced visitor numbers will lead to reduced spend on island in our retail and hospitality sectors. This will inevitably result in closures in our already fragile retail and hospitality sectors. The Isle of Man's economy as a whole and our visitor industry in particular can only prosper if it can rely on the existing unobstructed ferry services as the lifeline of our Island nation.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_037_005_180523	S47	Email	REDACTED, Manufacturing Manager for Swagelok Ltd and Sector Lead for our Road, Sea and Air members has provided the following statement: Living on an island means the timely movement of goods and people is paramount to our everyday lives. The Road, sea and air team are very supportive of green energy sources and committed to the regional drive to Net Zero. We are however concerned with the proposed planning location of the off-shore windfarms being in the "hub" of our key ferry routes as well as neighbouring ferry routes. The alternative routes shall see service performance of Steam Packet drop from 95% to 80% due to an increased impact from adverse weather conditions. This service level has a significant impact on our hauliers being able to provide the levels of service required to support domestic and international businesses. The on-cost of longer routes and more delays shall ultimately be realised by the paying public.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_050_002_310523	S42	Email	The MCA's remit for offshore renewable energy development is to ensure that safety of navigation is preserved, as progress is made towards government targets for renewable energy. This response is focused on the shipping and navigation elements of the PEIR and will form the basis of our response to the Environmental Impact Assessment Report in due course.	The Applicant notes your response. Response received.	No





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Mon_050_003_310523	S42	Email	Navigation Risk Assessment (NRA) and MGN Checklist –General Comments We note in Chapter 1.6 that two 14-daytraffic surveys (radar, AIS and visual) were completed in December 2021 and June to July 2022, which meets the required survey guidelines in MGN 654. This is supported by 2019 AIS data from Marine Traffic. Navigation simulations were conducted with the ferry operators followed by a Hazard Identification (HAZID) workshop in October 2022 where several concerns were raised by MCA and navigation stakeholders on the unacceptable collision risks, including cumulative risks. It is understood that since the HAZID workshop amendments have been made to the wind farm boundary and that further traffic surveys and navigation simulations will be completed, followed by an additional HAZID workshop. We expect the NRA to be updated with the additional data incorporated and MCA will provide further comments once completed.	Since PEIR, an additional hazard workshop has been undertaken (28-29 September 2023) which the MCA attended. In addition, AIS data has been updated to 2022 and additional vessel traffic surveys have been undertaken to ensure the highest quality of data is included in the assessment. The effects to the changes to the boundaries are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_050_004_310523	S42	Email	Appendix C provides a completed 'MGN654 Compliance matrix', however it should be noted that it is not evidence of compliance of the guidance as such, it is a checklist to be used as an aid to confirm the guidance has been addressed within the NRA.	This comment has been noted and addressed within the NRA (volume 6, annex 7.1)	Yes
Mon_050_005_310523	S42	Email	We are content at this stage with regards to the process you have undertaken so far in order to comply with MGN 654 and its annexes, and we welcome the work to be undertaken for addressing the guidance and recommendations in the future.	The Applicant notes your response.	No
Mon_050_006_310523	S42	Email	Layout The turbine layout design will require MCA agreement prior to construction to minimise the risks to surface vessels, including rescue boats, and Search and Rescue aircraft operating within the site. As such, MCA will seek to ensure all structures are aligned in straight rows and columns, including any platforms. Any additional navigation safety and/or Search and Rescue requirements, as per MGN 654 Annex 5, will be agreed at the approval stage.	The Applicant has committed to two lines of orientation in the layout of structures within the Mona Array Area to address potential impacts on search and rescue and shipping and navigation.	Yes
Mon_050_007_310523	S42	Email	Cumulative Impacts - MCA is concerned at this stage on the cumulative impacts of the proposed Mona, Morgan and Morecambe wind farm projects to the safety of navigation in the area, specifically on the reduction of safe navigable sea space and increased collision risk. The traffic density is significant within the area with strategically important passenger and cargo routes between the UK, Isle of Man, Northern Ireland and the Republic of Ireland. The current boundaries of all three wind farms cumulatively pose unacceptable risks to navigation for these passenger and cargo routes.	The developers of the Mona, Morgan and Morecambe Offshore Wind Projects have recognised the potential cumulative impacts on shipping and navigation to both commercial and safety receptors. As such, a Cumulative Regional NRA (CRNRA) was undertaken collaboratively by the three projects and was presented within the PEIR. Following the PEIR and S42 responses, all three projects have committed to modifications to their respective array area boundaries to increase searoom and minimise the potential cumulative impacts to shipping and navigation receptors. The effects associated with these boundary changes are presented in the updated NRA and appended CRNRA (volume 6, annex 7.1), and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_050_008_310523	S42	Email	Hydrographic Survey Data MGN 654 Annex 4requires 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. This information will need to be submitted, ideally at the EIA Report stage.	The Applicant notes your response. Final hydrographic survey data will be supplied to MCA Hydrography Manager.	No
Mon_050_009_310523	S42	Email	Cable Routes Export cable routes, cable burial protection index and cable protections are issues that are yet to be fully developed. However due cognisance needs to address cable burial and protection, particularly close to shore where impacts on navigable water depth may become significant. Any consented cable protection works must ensure existing and future safe navigation is not compromised. The MCA would accept a maximum of 5%	The Draft DCO submitted alongside the application secures a condition not to exceed 5% reduction in navigable depth without permission from NRW in consultation with MCA	Yes





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			reduction in surrounding depth referenced to Chart Datum. Where burial depths are not achieved, consultation will need to take place with MCA regarding the locations, impact and potential risk mitigation measures.		
Mon_050_010_310523	S42	Email	Safety Zones Safety zones during the construction, maintenance and decommissioning phases are supported, however it should be noted that operational safety zones may have a maximum 50m radius from the individual turbines. A detailed justification would be required for a 50m operational safety zone, with significant evidence from the construction phase in addition to the baseline NRA required supporting the case.	The Applicant notes your response. The Applicants intentions regarding safety zones are set out in the Safety Zone Statement (Document Reference J6) submitted alongside the application.	No
Mon_050_011_310523	S42	Email	Emergency Response - An Emergency Response Cooperation Plan is required to meet the requirements of MGN 654 Annex 5and will need to be in place prior to construction. The ERCoP is an active operational document and must remain current at all stages of the project including during construction, operations & maintenance and decommissioning. A SAR checklist will be discussed as the project progresses to track all requirements detailed in MGN 654 Annex 5.	The Applicant notes your response.	No
Mon_050_012_310523	S42	Email	Draft Development Consent Order (DCO) The draft DCO has been reviewed and we have the following comments to Schedule 14, Part 2:Condition 14(8) must include Trinity House	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_050_013_310523	S42	Email	Condition 14(11) should be amended to: In case of damage to, or destruction or decay of, the authorised project or any part thereof, excluding the exposure of cables and faults, the undertaker must as soon as reasonably practicable and no later than 24 hours following the undertaker becoming aware of any such damage, destruction or decay, notify NRW, MCA, Trinity House, the Kingfisher Information Service of Seafish and UKHO.	Condition 13 of the dML has been updated to reflect this comment.	No
Mon_050_014_310523	S42	Email	Condition 14(12) should be amended to: In case of buried cables becoming exposed on or above the seabed, the undertaker must within three days following identification of a cable exposure, notify mariners, regional fisheries contacts and the Kingfisher Information Service of Seafish of the location and extent of exposure. Copies of all notices must be provided to the MMO, MCA, Trinity House, and the UKHO within 5 days.	Condition 13 of the dML has been updated to reflect this comment.	No
Mon_050_015_310523	S42	Email	Condition 26 must include MCA, Trinity House and UKHO.	Condition 26 of the dML has been updated to reflect this comment.	No
Mon_050_016_310523	S42	Email	Conclusion The comments detailed above are considered appropriate and necessary for the safety of navigation and Search and Rescue purposes. We hope you find them useful at this stage and MCA are happy to discuss further as the project progresses.	The Applicant notes your response.	No
Mon_051_015_310523	S42	Email	Volume 2, Chapter 12: Shipping and Navigation - Major Comments Commercial fishing activity should be considered in conjunction with the cumulative effects on commercial shipping routes as spatial squeeze will bring higher likelihood of cross-industry conflict in terms of access and gear conflicts in areas surrounding the windfarm site, especially given the project site's proximity to key shipping routes in and out of Liverpool. Cargo and passenger services crossing the Irish Sea between Northern Ireland, the Isle of Man, and England will be required to adapt their routings throughout the lifespan of the project—this will have an even greater effect on the impacts to commercial fisheries.		Yes





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				process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_053_007_010623	S47	Email	Negatives:-There is a recognition that windfarm projects can significantly impact navigation safety, ship traffic routes, and possibly the ability to respond to at-sea emergencies;	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_053_008_010623	S47	Email	Any lengthening of the Steam Packet's voyage from England to Douglas is bound to result in a fare increase for hauliers which would be passed on to the Council by suppliers effected. The exact lengthening of the voyage time needs to be further clarified. If there are sufficiently wide paths through the proposed windfarm then maybe there won't be any increase in Steam Packet fares required. The impact to the Steam Packet and island residents (and visitors), if this can be worked around, then it should be encouraged;	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_053_011_010623	S47	Email	Whilst the Council acknowledges the pressing need for new and sustainable sources of energy, it is crucial that the objective is carefully balanced with the preservation of vital shipping lanes that are of utmost importance to the Isle of Man. Constructing wind farms in close proximity to long-established shipping lanes will lead to significant disruption to the Council and all residents	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are	





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				reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_057_001_020623	S47	Email	We are writing to you on behalf of the Chamber of Commerce, a membership based, not-for-profit company. To give some context, Chamber has some 500member firms, who themselves employ around 20,000 individuals, or almost 50% of the workforce of the Isle of Man (census43k).	The Applicant notes your response.	No
Mon_057_002_020623	S47	Email	We represent every key sector of the Island's economy through our membership, including for the sake of transparency, the Isle of Man Steam Packet who are members. The purpose of this paper is to focus on the economic impact of proposed windfarm developments.	The Applicant notes your response.	No
Mon_057_003_020623	S47	Email	We would like to be very clear that Chamber has no objections, indeed no comment, in relation to the policy of windfarm development.	The Applicant notes your response.	No
Mon_057_004_020623	S47	Email	Our submission to you is based on the economic impact that will result from the proposed UK offshore windfarm (Morgan & Mona) which will have direct impact on our long-established lifeline sea routeswith the UK (Heysham & Liverpool)	The Applicant notes your response.	No
Mon_057_005_020623	S47	Email	The location of the planned wind farms will add to journey times and reduce port turnaround times for urgent freight but will more worryingly have a severe effect on the use of adverse weather routes which will lead to more cancellations resulting in direct impact on our Island's vital freight deliveries and visitors. The island is highly reliant on same day fresh foods and imports over 80% of food consumed.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_057_006_020623	S47	Email	You will understand our position in protecting these routes for the IOM and its community who depend on these routes for their daily livelihood needs and travel.	The Applicant notes your response.	No
Mon_057_007_020623	S47	Email	We have gathered comments from our Sector Leads in the most effected industries to make it clear the impact the proposed windfarm development will have:	The Applicant notes your response.	No
Mon_057_008_020623	S47	Email	Nick Gibbs, Engineering Director at Strix Ltd and the Sector Lead for our STEM members has given the following statement: 'The Engineering and Manufacturing businesses on the Island are very concerned about any developments that may disrupt the reliability and regularity of the logistics links to the Isle of Man. These links are an essential element of the supply chain in both directions for our businesses, for incoming materials and out flow of products to our customers. In today's economic environment many of our businesses need to operate as lean as possible with regard to holding materials and stocks as well as needing to offer just-in-time delivery performance to our customers. Disruption to the supply chain will very quickly	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe	Yes



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			have a detrimental effect on our ability to function which will then directly impact our performance to our customers. Repeated and ongoing customer impact can be very damaging to reputation and future prospects. The last thing we need for business sustainability is to suffer the risk of increased supply chain disruption. Isolated examples of disruption already exist today from natural causes such as storms at sea. When the ferry service is cancelled due to bad weather our materials and products become stalled and priority on the next sailings is given to perishables, food and medical supplies over our supplies. This can quickly escalate to a crisis if sailings do not resume to normal in a reasonable period of time as the backlog will grow.	Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_057_009_020623	S47	Email	REDACTED, Managing Director of Robinsons and Sector Lead for our Local Economy Forum (large locally owned and operated business) has commented: The reliability and cost of the freight service to the Isle of Man is critical to the local retail and hospitality sector, the Group supports projects that deliver economic growth but in this instance would seek detailed reassurances that freight services would not be affected in either its timing's or burdened by extra costs. The Isle of Man retail sector, especially food retailers depend on reliable timed deliveries and any deterioration in the service could damage the prospects for investment in the sector and affect we believe the quality of life on the Isle of Man'.		
Mon_057_010_020623	S47	Email	REDACTED, CEO of Palace Holdings and Sector Lead for our Visitor Economy Members has provided the following statement: The Isle of Man's visitor industry is wholly dependent on reliable air and sea routes for its guests to travel to the Island. About 60% percent of our tourists use the sea links serviced by Steam Packet. It is obvious that any disruption or reduction of ferry services will have a material impact on our tourism sector. Even more so now the number of air routes to and from the UK has diminished. A reduced number of visitors to the Isle of Man due to cancelled, delayed or reduced number of sailings will also have a significant effect on our wider local economy. Reduced visitor numbers will lead to reduced spend on island in our retail and hospitality sectors. This will inevitably result in closures in our already fragile retail and hospitality sectors. The Isle of Man's economy as a whole and our visitor industry in particular can only prosper if it can rely on the existing unobstructed ferry services as the lifeline of our Island nation.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_057_011_020623	S47	Email	REDACTED, Manufacturing Manager for Swagelok Ltd and Sector Lead for our Road, Sea and Air members has provided the following statement: Living on an island means the timely movement of goods and people is paramount to our everyday lives. The Road, sea and air team are very supportive of green energy sources and committed to the regional drive to Net Zero. We are however concerned with the proposed planning location of the off-shore windfarms being in the "hub" of our key ferry routes as well as neighbouring ferry routes. The alternative routes shall see service performance of Steam Packet drop from 95% to 80% due to an increased impact from adverse	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with	





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			weather conditions. This service level has a significant impact on our hauliers being able to provide the levels of service required to support domestic and international businesses. The on-cost of longer routes and more delays shall ultimately be realised by the paying public.	the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_057_012_020623	S47	Email	The Isle of Man Chamber of Commerce has no objections to any windfarm development obtaining planning approvals-PROVIDED that on its own, or cumulatively our lifeline air and sea routes are unobstructed.	The Applicant notes your response.	No
Mon_058_001_020623	S47	Email	The Isle of Man Steam Packet has provided the ferry service to the Isle of Man for almost 200 years and the direct Heysham and Liverpool routes are lifeline services for a remote Island community with 85,000 people. The Island is completely dependent on IOMSPC reliable services.UK and Isle of Man Government policy highlights that it is essential for to protect remote Island community lifeline routes.	The Applicant notes your response.	No
Mon_058_002_020623	S47	Email	The Company carries around 600,000 passengers, 150,000 private vehicles and 40,000 freight trailers/vans per annum and is the only Ro-Ro ferry service to the Isle of Man carrying all urgent 'just-in time' food, retail, medicine and time sensitive lifeline and business supplies.	The Applicant notes your response.	No
Mon_058_003_020623	S47	Email	The Company has not objected to other Irish Sea Offshore Windfarms (OWF's) positioned away from our direct and weather routes but the Morgan and Mona development locations need to be adjusted to avoid our direct Isle of Man shipping routes and to maintain prudent navigational safety margins and requirements in the frequently harsh Irish Sea weather.	normal and adverse weather conditions, ferries would necessitate deviations	
Mon_058_004_020623	S47	Email	Even a 3-5 minute extra deviation will compromise vessel turnarounds during busy periods and lead to essential goods being left in Heysham as IOMSPC is already having to divert around West of Duddon Sands OWF (WoDS).	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies	





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				and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_005_020623	S47	Email	The cumulative impact of the development (on top of WoDS) as currently specified will:	As West of Duddon Sands is an existing offshore wind farm it has been included in the baseline environment as an ongoing existing impact.	No
Mon_058_006_020623	S47	Email	Disrupt remote Island lifeline supplies as freight trailers will be left in Heysham at peak volume periods due to a 8 minute reduction in freight loading time (WoDS and Morgan cumulative) –with no ability to speed up vessel or port turnarounds.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_058_007_020623	S47	Email	Disrupt Island lifeline supplies due to the reduction in weather routing options and the increased passage time for weather routing (4 times daily) will also lead to the cancellation of subsequent rotations. IOMSPC considers Heysham cancellations could double or treble as there will be insufficient time to 'catch up' from longer weather routes (x4). This will lead to a disruption to Island lifeline supplies and this is clearly unacceptable for end users.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_008_020623	S47	Email	Compromise safety of navigation due to insufficient gap between Walney and Morgan (as proven Wallingford simulations)	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety.	Yes





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				The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_009_020623	S47	Email	Increase risk to crew safety during turnarounds time in ports with significant cumulative restrictions on the time available.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_010_020623	S47	Email	Increase fuel costs and CO2 emissions.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_011_020623	S47	Email	Disrupt essential Island connectivity -IOMSPC services provide essential travel means for the public to and from the Isle of Man (IOM), and the IOM community rely on timely services for receiving UK medical treatment, travel overseas, business, tourism and day to day travel needs. The Island has a small domestic airport and over the years there have been issues in having reliable air travel and retaining service providers due to challenging financial difficulties faced by airlines for relatively modest scale operations.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance	





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				at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_012_020623	S47	Email	Reduced turnaround times and any failure to carry all booked traffic will lead to reputational damage resulting in long term passenger abstraction to air and IOMSPC revenue loss.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_058_013_020623	S47	Email	Increased cancellation rates for adverse weather periods Spring and Autumn will lead to reputational damage and loss of volume/revenues, and the Liverpool route is particularly vulnerable to revenue reductions.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_014_020623	S47	Email	While some UK shipping routes may not be materially affected by small diversions around OWF's (if the specific routes have 'surplus' time available), in the Isle of Man, the Heysham ferry is operating or loading/discharging 24/7 all year and there is no 'slack' in the timetable or surplus speed capability to recover from any disruption or additional diversions. 5 or 10 minutes diversions can therefore result in lifeline freight supplies being left in Heysham due to peak period turnaround time constraints. The Isle of Man Government policy is to boost the population to 100,000 and boost tourism and diversions will compromise this policy.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are	





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				reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_015_020623	S47	Email	The IOMSPC's new vessel, at a cost of £78m, has been specifically designed to offer 60% greater passenger capacity which will make turnarounds even more challenging. Any diversions of even one minute or more will therefore compromise this capacity investment and compromise the ability to load all freight trailers at peak periods.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_016_020623	S47	Email	Section 1: Infringement On Lifeline Routes IOMSPC will oppose an infringement on its c.200 year old essential lifeline direct routes and Morgan and Mona developments should be re-positioned to avoid further route deviations which will disrupt continuity of passenger travel and supply to a remote island community.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_017_020623	S47	Email	The Isle of Man is completely dependent on 'just in time' reliable lifeline deliveries and food retailers, manufacturers, businesses, medical centres, etc, do not have warehousing storage facility space and any disruptions in ferry supplies have an immediate and serious negative impact.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are	





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				reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_018_020623	S47	Email	The Ben-My-Chree (Passenger/Freight Ferry) on the twice daily Heysham route was purpose built for the direct Heysham route (pre WoDS diversions) and has no 'spare time' in her 24 hour timetable and no ability to increase speed. Even modest diversions around Morgan, on top of existing daily WoDS diversions (and occasional weather diversions), will reduce the port turnaround time to load freight trailers -which at busy periods will lead to freight being left in Heysham and empty supermarket shelves or other essential freight customers disruption.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_019_020623	S47	Email	The Island's population has increased from c.65,000 to 85,000 over the past 30 years and is projected to grow to 100,000 and freight/passenger traffic demand and tourism are all expected to grow. IOMSPC's new vessel at a cost of £78m has been specifically designed to offer 60% greater passenger capacity which will make turnarounds even more challenging. Any diversions of even a minute or more will therefore compromise this capacity investment and compromise the ability to load all freight trailers at peak periods. The growth in demand per sailing will lead to a significant increase in the number of sailings operating close to capacity while the turnaround times cannot be increased and cannot be 'sped up' due to physical and safety constraints. Any reduction in turnaround times arising from additional route deviations will ultimately lead to disruptions in vital lifeline freight supplies.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_020_020623	S47	Email	The Isle of Man is a 'remote Island community' and the Irish Sea is known for its harsh climate. Weather related or other sailing disruptions have a serious negative impact on the Islands lifeline food, medical, business supplies and passengers. Unlike many UK ferry routes there are no other Ro-Ro ferry services or routes to help compensate and there is no slack in the timetable to recover from delays and windfarm diversions.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are	





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				reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_021_020623	S47	Email	Disruptions to sailings or insufficient loading time can have severe consequences. Any disruption can have extreme consequences and there have been a number of examples of severe issues/disruptions faced in recent years, e.gEmpty supermarket shelves and 'panic buying'Disruption to 'just in time' business supplies for manufacturing, construction, agriculture, retailing etcDisruptions to Pharmacy and Hospital medicines and oxygen for the HospitalIssues related to supply of urgent water treatment chemicalsPotential airport closure as replacement airport fire engine urgently required. Cancellations, weather routing or delays can lead to freight and passenger backlogs, sometimes for several days and any reduction in turnaround load times arising from Morgan and Mona diversions would compound these disruption risks and lower the ability to cope with backlogs.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_022_020623	S47	Email	Company vessels already have to divert around the 'West of Duddon Sands' OWF, already increasing passage times by approximately 5 minutes each sailing. The Morgan/Mona OWFs as drafted in the PEIR would therefore increase direct routes by an extra 8 minutes per crossing, four times daily. With typically half an hour to discharge all freight and passenger vehicles, the load/lashing time for all freight trailers, vans, cars and coaches will be reduced from c.1 hour to only c. 50 minutes, a significant reduction of 16%. Vehicle decks with freight trailer movements are potentially dangerous environments for crew and passengers. While staff will be able to load safely on quieter sailings the OWFs positioned on direct routes may compromise turnaround safety if staff feel pressured to marshall, arrange freight trestles and lashing chains in even tighter timeframes. Passenger cars will be loaded as a priority to avoid long term reputational damage but time-sensitive lifeline freight trailers will inevitably be left if there is insufficient time in port. The costs and consequences of leaving freight trailers could be extremely severe for Island businesses and organisations and 'groupage ' trailers can have numerous end customers . It is essential that the negative effect and costs to potentially hundreds of lifeline 'end user/customers' are considered/avoided, e.g. haulier labour costs, manufacturing loss of production or sales, food/other retailer empty shelves, pharmacy supply disruption, business downtime or loss of sales, costs of workforce downtime, long term business reputational damage, etc. Disruption/costs could be compounded if there is no space/time on the following departure 12 hours later and Just in Time goods are therefore further delayed. Alternatively if private vehicle bookings had to be restricted at peak periods to allow more time for freight trailers, then this would cost IOMSPC hundreds of thousands income, also depressing visitor numbers and income for the Isle of Man tourism and accommodation indu	and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_023_020623	S47	Email	MV Manxman (larger Passenger/Freight Ferry) will replace MV Ben-my-Chree	The Applicant notes your response.	No
			on the Heysham route in 2023 on the same timetable. The vessel has 1000 passenger capacity (versus 630) and a larger vehicle deck to provide greater capacity for future volume growth and for existing peak demand periods such as school holidays, bank holidays, tourism events such as the IOM TT Races, Manx Grand Prix, Car Rally events and sporting events. While cars/vans are relatively quick to load, TT/MGP motorbikes (up to 40,000 carried in a		





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			fortnight) all have to be individually lashed and secured and the £75m investment in MV Manxman capacity will be compromised by any reduced loading time and negative impact on the volume of traffic that can be booked and safely loaded during these peak events.		
Mon_058_024_020623	S47	Email	TT and MGP periods always have excess demand and turnarounds are already extremely tight. The Company's plans to book freight on MV Ben-my-Chree during TT and load as many as 500 motorbikes (and cars/vans) on MV Manxman will be compromised by the extra passage time from WoDS and Morgan/Mona OWF diversions and tourist traffic/income to IOM would therefore be reduced.	The Applicant notes your response.	No
Mon_058_025_020623	S47	Email	Deviations should also be avoided from a fuel cost and emissions perspective. Even if the developer provided fuel cost compensation to IOMSPC this will not compensate for offsetting costs, and will not compensate end users in a remote Island community for potentially extreme consequences/costs from trailers being left in Heysham.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_026_020623	S47	Email	Section 2: Interference With Remote Island Lifeline And Strategic Supply Government Policies The Morgan and Mona developments interference with the Isle of Man direct routes contravene a number of Isle of Man and UK Government Policy statements:	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_027_020623	S47	Email	The Isle of Man Government "Manx Marine Environmental Assessment (MMEA)", Chapter 6.2 identifies that direct shipping routes are strategic requirements for Isle of Man and must be preserved. Quote: "Ro-ro shipping services carry the bulk of the Islands essential supplies with many Island businesses operating 'Just in Time' delivery schedules" "These services bring most of the food, raw materials, equipment and consumables used throughout the Island as well as carrying approximately 600,000 passengers annually" "The Cumulative impact of the various developments needs to be considered	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and	Yes



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			and direct routes as well as weather routing options will remain vital to shipping and the service provided to the Isle of Man's economy and its resident and visiting population" Morgan and Mona proposed developments on direct routes contravene the Isle of Man Government MMEA policy: "It is essential for the Isle of Man that direct routes between the Isle of Man, England, Northern Ireland, and Ireland be preserved"	the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_028_020623	S47	Email	HM Government 'UK Marine Policy Statement (MPS)', Section 3.4UK Government MPS Section 3.4 identifies that negative impacts on shipping should be avoided. Quote: "Ports and shipping play an important role in the activities taking place within the marine environment. They are an essential part of the UK economy" (3.4.1)"Some 95% of international trade by volume passes through portsour ports, particularly in Scotland, provide infrastructure and facilities to support lifeline ferry services to island communities. Their role is crucial not only in supporting the projected future growth of freight traffic, but also supporting more fragile and remote communities" (3.4.2)"Shipping is an essential and valuable economic activity for the UK" (3.4.5)Morgan and Mona positioning on our direct lifeline routes contravenes: "Marine plan authorities and decision makers should take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation, and navigational safety" (3.4.7)	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_058_029_020623	S47	Email	National Policy Statement for Renewable Energy (EN-3) The positioning of Morgan and Mona on our direct lifeline ferry routes will lead to reduced turnaround times which contravenes the principle highlighted in para 2.6.162. Quote: "The IPC should be satisfied that the site selection has been made with a view to avoiding or minimising disruption or economic loss to the shipping or navigation industries with particular regard to approaches to ports and to strategic routes essential to regional, national and international trade, lifeline ferries" As WoDS and Morgan proposed area will reduce turnaround load times by as much as c.16%-20% we consider this is a direct contravention of the principle (2.6.163): "The IPC should expect the applicant to minimise negative impacts to as low as reasonably practical (ALARP)"The c.20% reduction in turnaround loading time may also pose an increased risk to safety and human error and we note 2.6.165 "The IPC should not consent applications which pose unacceptable risks to navigational safety after all possible mitigation measures have been considered"	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_058_030_020623	S47	Email	The "UK Offshore Energy Strategic Environmental Assessment" also notes that shipping is essential to the UK and identifies shipping should not be materially adversely affected. The Morgan and Mona developments should be re-positioned to avoid the Isle of Man direct shipping routes. Even modest diversions will increase fuel/costs and emissions and lead to supply disruption at peak periods with social and economic consequences for the Islands population and businesses. Weather routing around Morgan will lead to additional vessel cancellations as the extra passage time 4 times a day is too	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe	





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			long to 'catch up'. This could easily double or treble cancellations leading to a major disruption in lifeline supplies.	Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_031_020623	S47	Email	Section 3: Safety Thecompany is concerned that the cumulative impact of all the various Irish Sea windfarms will compromise safety, reduce freedom of navigation and reduce weather routing options, leading to safety issues and increased sailing cancellations. As a minimum the gap between Walney and proposed Morgan development needs to be increased to a minimum of 5 –6 miles at any point: We note HR Wallingford Report (20 December 2022) re simulations. Quote	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_058_032_020623	S47	Email	"With traffic situations at the narrowest gap between Morgan and Mona, situations occurred with marginal passing distancesin some cases this action resulted in the vessel responding more to the waves leading to marginal or failed ship motion criteria"	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_033_020623	S47	Email	"In annually occurring conditions, the corridor between the existing Walney OWF and the proposed Morgan OWF was not viable". "Not sufficient space to pass with clearances that were acceptable to the masters. If any alteration to course was required" .There is also not enough space to deal with an emergency scenario if it requires the master to head into the wind and waves for any significant period of time.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety.	Yes





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				The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_034_020623	S47	Email	"Widening the proposed minimum 3.7 nm gap between proposed Morgan and Mona OWFs to about 5 nautical miles, would alleviate the traffic issues". While 5 miles between OWFs and all other fixed obstructions would be a minimum, IOMSPC considers that 6 miles would be more prudent -particularly as any adverse weather/poor visibility/limited sea room scenario leading to a collision would lead to a vessel being potentially out of action for 6 months or more, with no real prospects of obtaining charter tonnage that can fit within the limited confines of Heysham and Douglas harbours. In practice 5nm could also lead to increased cancellations in adverse weather as masters would seek to avoid risk, but this would then compromise IOM lifeline supplies and passengers.		Yes
Mon_058_035_020623	S47	Email	We note that developers have already (verbally) agreed that minimum 5 nm is required between OFWs and other obstructions -but to date the revised plans received only provide 1.6 nm –(contrary to maps provided which ignore Millon Gas field platform) which is unacceptable from a navigational safety perspective.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_058_036_020623	S47	Email	We certainly emphasise the need for further NRA simulation work to consider night time navigation assessment, any change of project boundary, fishing activity peak seasons, ship manoeuvring characteristics Manannan (Large High Speed Craft) and Manxman. It is worth noting that previous NRA simulation did not take account of night time navigation assessment, nor was it able to simulate the weather impact on our large High Speed Craft (Manannan) which carries 850 passengers, cars and freight operating between windfarms.	Additional navigation simulations were conducted with the ferry companies, including the Isle of Man Steam Packet during 2023. These simulation runs incorporated the proposed amendments to the array area boundaries of the Mona, Morgan and Morecambe offshore wind farm projects, more representative fishing activity and inclusion of night time simulations, all of which were successful. These changes are reflected in the updated NRA and CRNRA (volume 6, annex 7) and in the ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_058_037_020623	S47	Email	Further work will be required on 5nm.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the	Yes



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				Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_038_020623	S47	Email	Shifting of trailers and cargo in the harsh Irish Sea climate is not uncommon, and the lack of sea room needed for the Captain to place the vessel on a safe heading due to the presence of windfarms on both side of the route (gap between the proposed Morgan and existing West Duddon Sands projects) is highly concerning. Such issues were demonstrated in recent years with the MV Riverdance incident at Blackpool beach and again repeated during Morgan/Mona NRA simulation which was documented to be "failed & unacceptable".	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_058_039_020623	S47	Email	Vehicle decks with heavy freight trailer movements are potentially dangerous environments for crew and passengers. While staff will be able to load safely on quieter sailings the OWFs positioned on direct routes may compromise turnaround safety if staff feel pressured to marshall, arrange freight trestles and lashing chains in even tighter timeframes (significant reduction following WodS and Morgan diversions).	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_058_040_020623	S47	Email	IOMSPC notes with concern the cumulative impact of all the various OWF's which will negatively impact on weather routing options and safety. An absence of weather routing options will lead to increased cancellations of services that are currently viable and therefore disrupt lifeline supplies and passenger (i.e. IOM business staff) travel. It is essential that these cumulative	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise	Yes



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			impacts are also considered carefully before proceeding with these developments.	the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_041_020623	S47	Email	Section 4: Environmental Impact On Route Diversion As an example and to illustrate the Environmental impact caused on Douglas-Heysham diversion by the Ben-My-Chree as result of the Morgan project and in way of additional CO2 emission, 848 tonnes of CO2 per year will be produced as result. The additional amount of CO2 emissions indicated does not include those created during adverse weather routing which will significantly increase (diversion of 40mins per trip and on the basis of conservative 10% of the annual number of trips will add further 422 tonnes of CO2 emissions).	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_042_020623	S47	Email	Section 5: Appendices Included:-IOMSPC Comments on Extracts from Chapter 12/18-IOM Chamber of Commerce Letter -AIS Map showing direct IOM RoutesManx Marine Environmental Assessment (link below)hiips://www.gov.im/media/1363408/manx-marine-environmental-assessment-chapter-62-shipping-and-navigation2022-070722.pdf	The Applicant notes your response.	No
Mon_058_043_020623	S47	Email	IOMSPC Comments On Points Extracted From Chapter 12 And 18.Initial IOMSPC Statement On The Morgan/Mona Project PEIR Submission	The Applicant notes your response.	No
Mon_058_044_020623	S47	Email	Following review of the submission, IOMSPC expresses disappointment and real concern on the content with particular attention to Volume II (Shipping & Navigation and Socio-economics) where the impact assessment is fundamentally incorrect in a number of areas.	The Applicant notes your response.	No
Mon_058_045_020623	S47	Email	The submission does not reflect the IOMSPC's input and engagement in a number of meetings/workshops as well as the findings from the simulation sessions taken at HR Wallingford Simulator Sessions.	The findings of the hazard workshop and navigation simulations conducted as part of the PEIR, through which the Isle of Man Steam Packet contributed were described within the NRA and Shipping and Navigation Chapter of the PEIR. The findings of the updated NRA and CRNRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application describe the additional work undertaken with the Isle of Man Steam Packet to assess the amendments to the Mona Array Area boundary alone and cumulatively with other relevant projects.	Yes
Mon_058_046_020623	S47	Email	It is clear from this PEIR submission that NASH Maritime who are employed by the developers have not impartially reflected very significant issues for safety and lifeline supply to a remote Island community.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the	Yes





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				Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_047_020623	S47	Email	Mona & Morgan Historical Incident (PEIR)Table 12.10: MAIB/RNLI incident frequencies within 10nm per year (2008-2020)	The Applicant notes your response.	No
Mon_058_048_020623	S47	Email	IOMSPC comment -The subject table does not include one of most known ferry disasters in the NW of the UK in 2008 and where the MAIB made an extensive incident report (see extract below in relation to the project area and its surrounding known weather with freak waves). This begs the question on the need for sea room to allow the vessel to weather route on normal passage, or in way of preparedness to divert should a cargo shift. It is worth noting such incident would have different magnitude for our Ro/Pax carrying up to 1000 passengers and freight cargo. Hence the need for sea room around the Douglas-Heysham route becomes top priority. For illustration we have extracted sections from the MAIB Report on MV Riverdance Ferry Incident which occurred in the vicinity of the proposed project area in 2008.	Whilst the MV Riverdance is not reported in this section, the incident is well known to the project team and contributed to the drafting of the NRA and Shipping and Navigation Chapter. The navigation simulations undertaken in 2022 for the PEIR and in 2023 for the ES, at which the Steam Packet attended, also tested extreme adverse weather conditions.	No
Mon_058_049_020623	S47	Email	2.5.2 "Freak" waves during the initial reports made to the coastguard, it was suggested that the initial list was due to Riverdance being struck by a "freak" (i.e. abnormal) wave. However, the area around the Lune Deep is notorious for large, steep faced swells, and in the weather conditions experienced at the time of this accident, large and unpredictable swells could have been reasonably foreseen. Waves experienced by Riverdance might well have been excessive, with swell waves reported to be up to 7.0m. They would also have been intensified, and been made steeper, as a result of the ebb tide from Morecambe Bay. However, this could not be considered to be "freak", especially within this area.		No
Mon_058_050_020623	S47	Email	"Meanwhile, on the bridge, the master had disengaged the automatic pilot and, in manual steering, placed the wheel hard over to starboard. It was his intention to bring Riverdance's head round into the wind to reduce the rolling. Riverdance then experienced a change of ship's head from 103° to 170° within 39 seconds, a rate of turn of over 100° per minute (Figures 4a and b). During the turn, the vessel's list to port increased substantially, reportedly up to 50°"		No
Mon_058_051_020623	S47	Email	Safety Issue Identified and Recorded By The MAIB From Riverdance Incident: "The weather conditions at the time of the initial heeling accident were very poor and could have led to difficulties in steering, broaching or loss of stability".	The Applicant notes your response.	No
Mon_058_052_020623	S47	Email	Extracts from Morgan PEIR Chapters 12 and 18 and IOMSPC Comments	The Applicant notes your response.	No
Mon_058_053_020623	S47	Email	12.4.4.25Page 15"Commercial shipping routes with more than one vessel movement per day within the shipping and navigation study area are all to/from the Port of Liverpool and are clear of the Morgan Array Area. There are numerous commercial routes with less than one vessel per day passing through or adjacent to the Morgan Array Area. These include routes into	The Applicant notes your response.	No





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			Heysham and Douglas and alternative routes to/from Liverpool from the east of the Isle of Man. Most of these routes have less than one commercial vessel transit per week. Analysis of vessel tracks during Met Office named storm events did not identify any repeatable adverse weather routeing by commercial shipping. However, during strong south westerlies, the anchorage to the east of Anglesey was in greater demand by vessels"		
Mon_058_054_020623	S47	Email	IOMSPC comment -The paragraph appears incorrect/misleading -IOMSPC Douglas -Heysham lifeline commercial shipping route usually has 4 sailings per day through Morgan.	Within the NRA (volume 2, annex 7.1) and Shipping and Navigation Chapter (volume 2, chapter 7), a distinction is drawn between ferries (passenger and Ro-Ro) and commercial routes (including cargo and tanker trade) to reflect the greater risks and sensitivity for regular ferry routes carrying passengers. The impacts on the Isle of Man Steam Packet routes are detailed fully in the relevant sections of these documents.	Yes
Mon_058_055_020623	S47	Email	"Construction Phase "Magnitude of Impact12.8.3.3During construction, vessel traffic would be displaced from the Morgan Array Area due to the presence of construction buoyage and safety zones around fixed structures which are under construction. It is anticipated that mariners would also maintain safe passing distance of at least one nautical mile from navigational hazards. It is anticipated vessels would deviate around the construction site.	The Applicant notes your response.	No
Mon_058_056_020623	S47	Email	The analysis of vessel routes in section 12.4.4 shows that several ferry and commercial shipping routes would necessitate deviation around the Morgan Array Area (see Table 12.17 and Table 12.18, and Figure 12.6 and Figure 12.7 respectively). The revised passage plans were developed by the NASH project team, including master mariners, and account for existing decision-making principles (such as passing at least 1.5nm from a wind turbine) that were obtained during consultation with operators and the navigation simulation sessions (see volume 4, annex 12.1: Navigational Risk Assessment of the PEIR). Of the four ferry routes directly impacted by the Morgan Array Area: The Isle of Man Steam Packet Company route between Heysham and Douglas with approximately 1,300 movements per year passing across the northeast boundaryof the Morgan Array Area. This would require a deviation of 1.0nm / 3.5 minutes of steaming time per trip to the northeast, through the centre of the corridor between the Morgan Array Area and Walney Offshore Wind Farm"		No
Mon_058_057_020623	S47	Email	IOMSPC comment -The reference to 3.5 minutes is misleading as IOMSPC is now having to deviate around the West of Duddon Sands OWF and the combined deviation around WoDS and now Morgan would add c.8 minutes per sailing to the Islands direct route (four times daily).	As West of Duddon Sands is an existing offshore wind farm it has been included in the baseline environment as an ongoing existing impact.	No
Mon_058_058_020623	S47	Email	Revised Passage plans need to be decided/developed by the Operators Masters (not NASH project team) who are armed with local knowledge and familiar with the sea area climate/routes/traffic likely to be encountered.	Passage plans were developed using NASH's inhouse mariners and verified during the navigation simulations, held in 2022 for the PEIR and in 2023, for the ES and in which the ferry companies (Stena Line, Seatruck and Isle of Man Steam Packet) were participating.	No
Mon_058_059_020623	S47	Email	With almost 200 years Steam Packet experience on the Heysham-Douglas route, it is not uncommon where the vessel has to wait outside the confined Heysham to alleviate port entry wind or visibility limitations as well as height of tide -such occurrences can only aggravate remaining turn around time in the port to accommodate normal traffic.	The Applicant notes your response.	No
Mon_058_060_020623	S47	Email	To obtain planning approval the southern tip of WoDS development was reduced to avoid excessive deviations for IOMSPC but the Morgan proposal now adds further deviations.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42	Yes





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				responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_061_020623	S47	Email	Turnaround times for IOMSPC vehicles/freight can be extremely challenging at peak periods. Discharge and loading times for freight/cars vary due to daily variations in demand and the mix of private and commercial traffic, but freight trailer load times of only c.40 minutes would effectively be reduced toc.30 minutes.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_062_020623	S47	Email	95% of IOMSPC freight is 'drop-trailers' (i.e. not self-propelled) and each individual trailer has to be hitched to a tug master tractor unit, reversed down the linkspan and onto the upper or lower vehicle decks (with no passengers present) and then safely unhitched, stowed and chained, before the tug master driver can exit the internal ramp and vessel to hitch up, drive and load the next trailer etc. etc These issues will be compounded as:		No
Mon_058_063_020623	S47	Email	IOM population and traffic per sailing is projected to grow;	The Applicant notes your response.	No
Mon_058_064_020623	S47	Email	The vessel was purpose built, operates 24/7, cannot 'speed up' or make up time.	The Applicant notes your response.	No
Mon_058_065_020623	S47	Email	With significantly reduced time for the safe loading of freight trailers, the combined WoDS/Morgan deviation will at peak periods lead to goods being left in Heysham due to insufficient time to load/lash and the need to maintain published timetables.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies	





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				and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_066_020623	S47	Email	With much of IOMSPC freight shipped as 'groupage' via haulage companies and potentially sometimes hundreds of end recipients, IOMSPC is in no position to arbitrarily determine which booked freight trailers are 'urgent'/life-threatening and which are not.	The Applicant notes your response.	No
Mon_058_067_020623	S47	Email	"The Isle of Man Steam Packet Company route between Douglas and Liverpool with approximately 625 movements per year passes across the southwest boundary of the Morgan Array Area. This would require a deviation of 0.3nm / 0.6 minutes of steaming time per trip"	The Applicant notes your response.	No
Mon_058_068_020623	S47	Email	IOMSPC comment -0.8 minutes (see 12.10.3.5) may appear relatively minor but IOMSPC carries around 600,000 passengers p/a and it would clearly be more sensible for UK/IOM and general public to avoid unnecessary deviations and to avoid extra fuel cost, passage time, and reductions of traffic (to air competition).	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_069_020623	S47	Email	The above statement does not accommodate the impact on the route which needs to be followed during most commonly South Westerly adverse weather, and where the vessel will have greater impact on re-routing in the absence of sea room created by the Morgan project area. This will lead to increased sailing cancellations as a result, particularly concentrated in the Spring and Autumn periods for HSC Manannan.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_070_020623	S47	Email	12.8.3.10"For commercial routes, only routes with less than one transit per day would be impacted and are widely dispersed within the shipping and navigation study area. Whilst impacts to these routes may be of greater magnitude, they have far fewer vessel transits. Of the routes which have the greatest deviations, which are between Liverpool and ports or passages to the		No





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			east of the Isle of Man, these would necessitate an increase in distance of less than 2.5nm which is not anticipated to make such routes unviable. Table 12.18 shows some routes with minor reductions in distance, caused by the Morgan Array Area making less direct routes, routinely used to avoid traffic or weather, no longer possible."		
Mon_058_071_020623	S47	Email	IOMSPC comment –This is misleading/incorrect. The Douglas -Heysham route carries 95% of all commercial goods to the Isle of Man, and it is clearly a 'commercial route' to a remote Island community completely dependent on reliable links.	Within the NRA (volume 2, annex 7.1) and Shipping and Navigation Chapter (volume 2, chapter 7), a distinction is drawn between ferries (passenger and Ro-Ro) and commercial routes (including cargo and tanker trade) to reflect the greater risks and sensitivity for regular ferry routes carrying passengers. The impacts on the Isle of Man Steam Packet routes are detailed fully in the relevant sections within these documents.	No
Mon_058_072_020623	S47	Email	12.8.3.11"Timetabled ferry services are more sensitive to impacts associated with increased transit time due to constraints on their schedules, berthing or crewing requirements (see volume 4, annex 12.1: Navigational risk assessment of the PEIR). Four routes would require deviation around the Morgan Array Area: The Isle of Man Steam Packet Company route between Heysham and Douglas with approximately 1,300 movements per year passes across the north east boundary of the Morgan Array Area. To pass clear to the northeast this would necessitate an additional 3.5 minutes of steaming time per trip. On a three hour and 45 minute service, with greater existing variation in transit duration and turn around time, the deviation is not anticipated to impose significant operational impacts"	The Applicant notes your response.	No
Mon_058_073_020623	S47	Email	IOMSPC comment -IOMSPC vessel is already having to divert around WoDS OWF and the combined additional passage time will significantly reduce turnaround times for the loading of freight trailers. This will be a VERY SERIOUS negative impact which on busy dates will lead to urgent lifeline supplies being left in Heysham.	As West of Duddon Sands is an existing offshore wind farm it has been included in the environmental baseline as an ongoing existing impact. The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_074_020623	S47	Email	"The Isle of Man Steam Packet Company route between Douglas and Liverpool, with approximately 625 movements per year, passes across the northwest boundary of the Morgan Array Area. To pass to the west, this would necessitate an additional 0.6 minutes of steaming time per trip. On a three hour service, with greater existing operational variation in transit duration and turn around time, the deviation is not anticipated to impose significant operational impacts	The Applicant notes your response.	No
Mon_058_075_020623	S47	Email	IOMSPC comment –much longer weather routings would lead to increased cancellations, reputational damage, loss of revenues.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater	





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				transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_076_020623	S47	Email	12.8.3.12"As the additional impact on these routes is less than existing operational constraints, the sensitivity of the receptor is, therefore, considered to be low."	The Applicant notes your response.	No
Mon_058_077_020623	S47	Email	IOMSPC comment -further deviation of the Heysham-Douglas route must be avoided as leaving lifeline freight in Heysham is unacceptable.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_058_078_020623	S47	Email	Impact on the Safety of Navigation created by the project area was demonstrated during the simulation where NRA confirmed unacceptable level of risk.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes





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Mon_058_079_020623	S47	Email	12.8.3. "Significance of the Effect Overall, the magnitude of the impact is deemed to be high and the sensitivity of the receptor is considered to be Low. The effect will, therefore, be of minor adverse significance, which is not significant in EIA terms. A Minor rather than Moderate effect has been determined given the minimal increase in journey times which are within the existing natural variation of operator schedules."	The Applicant notes your response.	No
Mon_058_080_020623	S47	Email	IOMSPC comment -extra deviations on top of WoDS deviations are NOT 'minor adverse'! -Lifeline freight/essential supplies will be left on busier dates – which could be devastating for food/medical /business supplies, etc.	As West of Duddon Sands is an existing offshore wind farm it has been included in the environmental baseline as an ongoing existing impact. The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_081_020623	S47	Email	"Operations and Maintenance Phase- The impacts to commercial operators including strategic routes and lifeline ferries during operations and maintenance are not anticipated to be substantially different to those during construction. During both the construction and the operational phases of the Morgan Generation Assets, large commercial ships will not be able to transit through the Morgan Array Area, whether through the presence of construction buoyage or structures and therefore the impact on vessel routeing will be the same, albeit for different durations. Therefore, the magnitude of the impact is deemed to be high and the sensitivity of the receptor is considered to be low. The effect will, therefore, be of minor adverse significance, which is not significant in EIA terms. A minor rather than moderate effect has been determined given the minimal increase in journey times which are within the existing natural variation of operator schedules. Decommissioning Phase- The impacts to commercial operators including strategic routes and lifeline ferries during decommissioning are not anticipated to be substantially different to those during construction. During both the construction and the decommissioning phases of the Morgan Generation Assets, large commercial ships will not be able to transit through the Morgan Array Area, whether through the presence of decommissioning buoyage or structures and therefore the impact on vessel routeing will be the same. However, it should be noted that the impacts will reduce as decommissioning progresses and the extent of structures within the Morgan Array Area reduces. Therefore, the magnitude of the impact is deemed to be high and the sensitivity of the receptor is considered to be low. The effect will, therefore, be of minor adverse significance, which is not significant in EIA terms. A minor rather than moderate effect has been determined given the minimal increase in journey times which are within the existing natural variation of operator schedules."		No





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Mon_058_082_020623	S47	Email	IOMSPC comment -extra deviations on top of WODS deviations are NOT 'minor' -lifeline freight will be left at peak periods.	As West of Duddon Sands is an existing offshore wind farm it has been included in the environmental baseline as an ongoing existing impact. The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_058_083_020623	S47	Email	"The Isle of Man Steam Packet Company Heysham to Douglas adverse weather routeing accounts for an additional 10 to 23 minutes of journey time, on a 225 minute journey, as identified within the 2019 AIS data. During the navigation simulations and consultation, it was determined that these vessels would be unlikely to transit through the corridor between the Morgan Array Area and Walney Offshore Wind Farm during adverse weather, instead choosing to navigate to the west of the Morgan Array Area where there is greater sea room and ability to choose a safer and more comfortable heading. This would necessitate a further 17 minutes in journey times, a total delay of at least 27 minutes to the typical route."	The Applicant notes your response.	No
Mon_058_084_020623	S47	Email	IOMSPC comment –i.e.27 to 40 minutes extra passage time for each sailing (speed variation during adverse weather) which would lead to as much as 2 hours 40 minutes delay in each 24 hours. While the Company could potentially operate one return per day in this scenario, it is highly questionable whether the second rotation or subsequent rotations could still be provided due to the cumulative delays from the inability to take shorter adverse weather routes. Therefore prolonged adverse weather of more than 12 hours would lead to an additional cancellation as a result of Morgan. While IOMSPC would clearly seek to minimise delays where possible, in reality the Company could not catch up from a 2 hour or 2 hour 40 minute delay and so cancellations would inevitably result -leading to disruptions in food/medicines /business supplies etc for the Isle of Man.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_085_020623	S47	Email	IOMSPC considers current cancellation rates could easily double or treble.12.8.4.17"Ferry services in the shipping and navigation study area are important for facilitating trade, tourism and other important functions. In particular, consultees emphasised that services between the Isle of Man and the UK are lifeline services which carry food and goods which are crucial in a just-in-time economy. The socio-economics assessment and approach for	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications	Yes





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			considering potential impacts of the Morgan Generation Assets on the IoM is set out within volume 2, chapter 18: Socio-economics of the PEIR"	of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_086_020623	S47	Email	IOMSPC comment -Chapter 18 has no impact assessment for IOM businesses/economy! "During adverse weather, cargo shift as a result of reduced optionality on vessel heading could cause minor injuries and property damage. Due to the potential loss of services to the Isle of Man, the sensitivity of the receptor is therefore, considered to be medium."	The Applicant notes your response.	No
Mon_058_087_020623	S47	Email	IOMSPC comment -additional cancellations and the (cumulative) increased risk of leaving urgent freight in Heysham are extremely sensitive/serious, with significant negative impact to a remote Island community.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_088_020623	S47	Email	"During consultation and navigational simulations, the conditions in which adverse weather routes would be taken, or services cancelled, was shown to be dependent on many different factors including route, vessel, wind/wave directions, wind speed and wave height. However, it was estimated that the Isle of Man Steam Packet Company service between Liverpool and Douglas (Manannan) would be impacted at a significant wave height (Hs) of 1.6m and cancelled at 2m Hs. The Stena route between Liverpool and Belfast would be impacted at 2.4m Hs and cancelled at 3.4m Hs. These thresholds are noted to be conservative given the frequency of occurrence for historical transits in 2019 (see Table 12.19)"	The Applicant notes your response.	No
Mon_058_089_020623	S47	Email	IOMSPC comment –The estimation on Significate Wave height impact for Liverpool route vessel (Manannan) is incorrect as the vessel is designed and MCA certified to operate up to 3.5m significate wave height, and where weather routing becomes essential for this type of vessel to achieve a sailing. Passenger comfort is extremely relevant hence the need for weather routing in lesser adverse weather conditions. It is worth noting that the IOM Met Office estimate strong wind/adverse weather up to 40% of the annual weather condition experience in the Irish Sea.	The Applicant notes your response.	No





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Mon_058_090_020623	S47	Email	Chapter 18 Socio -Economics. IOMSPC comment -The first 72 pages of Chapter 18 only considers the impact to UK and there has been no assessment or consultation to date on the serious adverse impact on IOM end users(people and businesses/organisations), even though the UK Government policy states that lifeline routes to remote communities must be protected. There is only one page reference(page 73) which acknowledges that the Morgan negative socioeconomic impact on the Isle of Man needs further assessment. Why hasn't this serious socioeconomic impact been considered to date? Leaving food or medicines or business supplies in Heysham would clearly have a major impact to an Island community completely dependent on its lifeline shipping.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_058_091_020623	S47	Email	Chapter 18, page 73, refers to these impacts as 'indirect' consequences but 85,000 people in a remote Island community will be directly impacted by these proposals (disruptions to lifeline food supplies, hospitals, manufacturing businesses, just in time supplies to over 400 companies).	The Applicant notes your response.	No
Mon_058_092_020623	S47	Email	WODS and Morgan combined deviations of over 10 minutes will lead to freight trailers being left in Heysham on busy days -all freight on the Heysham-Douglas Ro-Ro service is 'just in time' time-sensitive, so who/how should IOMSPC determine what freight can be left? .What will be the impact on IOM end user businesses, employment, tourism, IOM economy etc. etc. etc.?	As West of Duddon Sands is an existing offshore wind farm it has been included in the environmental baseline as an ongoing existing impact. The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_058_093_020623	S47	Email	10 minutes deviations around WODS and Morgan (combined effect) will lead to a reduction in IOM TT, MGP and special event tourism as there will be a notable reduction in motorbike/vehicle loading and lashing times. What will be the impact on IOM tourism/economy?	As West of Duddon Sands is an existing offshore wind farm it has been included in the environmental baseline as an ongoing existing impact. The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe	Yes





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				Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_094_020623	S47	Email	Chapter 12 states c. 50% increase in weather cancellations due to Morgan but IOMSPC estimates that 2 hours to 2 hours 40 minutes extra passage time per day for weather routing around Morgan will potentially double cancellation rates as the vessel is operating 24/7 and has no spare time to 'catch up' 2 hours 40 minutesWhat will be the impact on IOMSPC reputation/revenues? - What will be the impact on IOM retailers, hospitals, business supplies, etc. etc. etc? From the reduction in reliability of supply?-IOM Chamber of Commerce highlighted their concerns to the developers almost a year ago -why hasn't the developer consulted with IOM businesses/retailers?	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_058_095_020623	S47	Email	Table 18.95 reference implies that that further work is required to address the navigational/manoeuvring space issue for shipping ("navigational corridors") in Chapter 12, but IOMSPC notes that additional deviations on top of the WoDs deviations remain impractical due to time constraints.	As West of Duddon Sands is an existing offshore wind farm it has been included in the environmental baseline as an ongoing existing impact. The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_058_096_020623	S47	Email	Both Chapter 12 and 18 completely ignore the combined deviation from WODs/Morgan and the primary negative impact would be the severe negative impact to the 'end user' in Isle of Man when goods are no longer delivered, due to insufficient turnaround time and/or increased weather cancellations, i.e. not just manoeuvring space issues.	As West of Duddon Sands is an existing offshore wind farm it has been included in the environmental baseline as an ongoing existing impact. The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and	Yes





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				the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_058_097_020623	S47	Email	Please note there is an accompanying image - https://rpsgroup.sharepoint.com/:f:/r/sites/EOR0801- MorganandMonaSubcontractors/Shared%20Documents/General/03_Stakehol der%20engagement/04_Mona%20Stat%20Consultation?csf=1&web=1&e=4M SgFD	The Applicant notes your response.	No
Mon_063_001_020623	S42	Email	Standard navigation conditions for inclusion within Deemed Marine Licences (DML) for offshore renewable energy installations. Agreed by Marine Management Organisation (MMO), Trinity House, Maritime and Coastguard Agency (MCA) and UK Hydrographic Office (UKHO)	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_063_002_020623	S42	Email	Notifications and Inspections: 1) The undertaker must inform the MMO Coastal Office in writing at least 5 days prior to the commencement of the authorised projector any part thereof, and within 5 days of completion of the authorised project.	Notifications will be provided to NRW under condition 13 of the dML.	No
Mon_063_003_020623	S42	Email	2) The Kingfisher Information Service of Seafish, must be informed of details of the vessel routes, timings and locations relating to the construction of the authorised projector any part thereof by email to REDACTED:	Condition 13 of the dML has been updated to reflect this comment.	No
Mon_063_004_020623	S42	Email	a)at least 14 days prior to the commencement of offshore activities, for inclusion in the Kingfisher Fortnightly Bulletin and offshore hazard awareness data, and;	Condition 13 of the dML has been updated to reflect this comment.	No
Mon_063_005_020623	S42	Email	b) as soon as reasonably practicable and no later than 24 hours of completion of all offshore activities.	Condition 13 of the dML has been updated to reflect this comment.	No
Mon_063_006_020623	S42	Email	Confirmation of notification must be provided to the MMO within 5 days.	Notifications will be provided to NRW under condition 13 of the dML.	No
Mon_063_007_020623	S42	Email	3) The undertaker must ensure that a local notification to mariners is issued at least 14 days prior to the commencement of the authorised projector any part there of advising of the start date of each Work No. <insert>and the expected vessel routes from the construction ports to the relevant location. Copies of all notices must be provided to the MMO, MCA and UKHO within 5 days.</insert>	Condition 13 of the dML has been updated to reflect this comment. Notifications will be provided to NRW under condition 13 of the dML.	No
Mon_063_008_020623	S42	Email	4) The undertaker must ensure that local notifications to mariners are updated and reissued at weekly intervals during construction activities and at least 5 days before any planned operations (or otherwise agreed) and maintenance works and supplemented with VHF radio broadcasts agreed with the MCA in accordance with the construction and monitoring programme approved under deemed marine licence condition <insert>.Copies of all notices must be provided to the MMO and UKHO within 5 days.</insert>	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_063_009_020623	S42	Email	5) The undertaker must notify the UKHO of the completion(within 14 days) of the authorised projector any part thereof in order that all necessary amendments are made to nautical charts. Copies of all notices must be provided to the MMO and MCA within 5 days.	Condition 13 of the dML has been updated to reflect this comment. Notifications will be provided to NRW under condition 13 of the dML.	No





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Mon_063_010_020623	S42	Email	6) In case of damage to, or destruction or decay of, the authorised project seaward of MHWS or any part thereof, excluding the exposure of cables, the undertaker shall as soon as reasonably practicable and no later than 24 hours following the undertaker becoming aware of any such damage, destruction or decay, notify MMO, MCA, Trinity House, UKHO, the Kingfisher Information Service of Seafish and regional fisheries contacts.	Condition 13 of the dML has been updated to reflect this comment. Notifications will be provided to NRW under condition 13 of the dML.	No
Mon_063_011_020623	S42	Email	7) In case of buried cables becoming exposed on or above the seabed, the undertaker must within three days following identification of a cable exposure, notify mariners, regional fisheries contacts and the Kingfisher Information Service of Seafish of the location and extent of exposure. Copies of all notices must be provided to the MMO, MCA, Trinity House, and the UKHO within 5 days.	Condition 13 of the dML has been updated to reflect this comment. Notifications will be provided to NRW under condition 13 of the dML.	No
Mon_063_012_020623	S42	Email	Pre-construction plans and documents: The authorised project shall not commence until the following have been submitted to and approved by the MMO. Each programme, statement, plan, protocol, scheme or other detail required to be approved under this condition must be submitted to the MMO for approval at least 6 months prior to the commencement of the authorised project except where otherwise stated.	Notifications will be provided to NRW under condition 18 of the dML.	No
Mon_063_013_020623	S42	Email	1) A plan to be agreed in writing with the MMO following appropriate consultation with Trinity House, the MCA and UKHO, setting out proposed details of the authorised project, including the:	Condition 18(1)(a) requires the submission of a design plan for approval.	No
Mon_063_014_020623	S42	Email	a) number, dimensions, specification, foundation type(s) and depth for each WTGs, offshore platforms, substations and meteorological masts;	Condition 18(1)(a) requires the submission of a design plan for approval.	No
Mon_063_015_020623	S42	Email	b) the grid coordinates of the centre point of the proposed location for each WTG, platform, substation and meteorological mast;	Condition 18(1)(a) requires the submission of a design plan for approval.	No
Mon_063_016_020623	S42	Email	c) proposed layout of all cables; and	Condition 18(1)(a) requires the submission of a design plan for approval.	No
Mon_063_017_020623	S42	Email	d) location and specification of all other aspects of the authorised project.	Condition 18(1)(a) requires the submission of a design plan for approval.	No
Mon_063_018_020623	S42	Email	2) An Aids to Navigation Management Plan to be agreed in writing by the MMO following appropriate consultation with Trinity House specifying how the undertaker will ensure compliance with conditions (1) to (4) of 'Aids to Navigation' from the commencement of construction of the authorised project to the completion of decommissioning.	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_063_019_020623	S42	Email	3)No part of the authorised project may commence until the MMO, in consultation with the MCA, has confirmed in writing that the undertaker has taken into account and, so far as is applicable to that stage of the project, adequately addressed all MCA recommendations as appropriate to the authorised project contained within MGN654 "Offshore Renewable Energy Installations (OREIs) –Guidance on UK Navigational Practice, Safety and Emergency Response Issues" and its annexes.	Condition 22 requires the undertaker to take account of the Offshore Renewable Energy Installations (OREIs) –Guidance on UK Navigational Practice, Safety and Emergency Response Issues.	No
Mon_063_020_020623	S42	Email	4)A construction method statement in accordance with the construction methods assessed in the environmental statement and including details of –	Condition 18(1)(d) requires the submission of an offshore construction method statement for approval.	No
Mon_063_021_020623	S42	Email	i) Cable specification, installation and monitoring, to include:	Condition 18(1)(d) requires the submission of an offshore construction method statement for approval.	No
Mon_063_022_020623	S42	Email	a) technical specification of offshore cables below MHWS;	Condition 18(1)(d) requires the submission of an offshore construction method statement for approval.	No





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Mon_063_023_020623	S42	Email	b) a detailed cable laying plan for the Order limits, incorporating a burial risk assessment encompassing the identification of any cable protection that exceeds 5% of navigable depth referenced to chart datum and, in the event that any area of cable protection exceeding 5% of navigable depth is identified, details of any steps (to be determined following consultation with the MCA and Trinity House) to be taken to ensure existing and future safe navigation is not compromised or such similar assessment to ascertain suitable burial depths and cable laying techniques, including cable protection; and		No
Mon_063_024_020623	S42	Email	c) proposals for monitoring offshore cables including cable protection during the operational lifetime of the authorised scheme which includes a risk based approach to the management of unburied or shallow buried cables.	Condition 18(1)(d) requires the submission of an offshore construction method statement for approval.	No
Mon_063_025_020623	S42	Email	Pre-construction monitoring and surveys 5)Aswath bathymetric survey to IHO Order 1a of the area within the Offshore Order Limits extending to an appropriate buffer around the site, must be undertaken. The survey shall include all proposed cable routes. This should fulfil the requirements of MGN654 and its supporting 'Hydrographic Guidelines for Offshore Renewable Energy Developers', which includes the requirement for the full density data and reports to be delivered to the MCA and the UKHO for the update of nautical charts and publications. This must be submitted as soon as possible, and no later than [three months]prior to construction. The Order Limit shapefiles must be submitted to MCA. The Report of Survey must also be sent to the MMO.	Condition 24 requires the undertaker to do a swath-bathymetry survey. Notifications will be provided to NRW under condition 24 of the dML.	No
Mon_063_026_020623	S42	Email	Aids to Navigation: 1) The undertaker shall during the whole period from the commencement of construction of the authorised project to the completion of decommissioning exhibit such lights, marks, sounds, signals and other aids to navigation, and to take such other steps for the prevention of danger to navigation as Trinity Housemay from time to time direct.	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_063_027_020623	S42	Email	 The undertaker must during the whole period from the commencement of construction of the authorised project to the completion of decommissioning keep Trinity House and the MMO informed of progress of the authorised project including; 	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_063_028_020623	S42	Email	a. notice of commencement of construction of the authorised project within 24 hours of commencement having occurred;	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_063_029_020623	S42	Email	b. notice within 24 hours of any aids to navigation being established by the undertaker; and	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_063_030_020623	S42	Email	c. notice within 5 days of completion of construction of the authorised project.	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_063_031_020623	S42	Email	3) The undertaker must provide reports to Trinity House on the availability of aids to navigation in accordance with the frequencies set out in the aids to navigation management plan agreed pursuant to condition <insert>using the reporting system provided by Trinity House.</insert>	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_063_032_020623	S42	Email	4) The undertaker must during the whole period from the commencement of construction of the authorised project to the completion of decommissioning notify Trinity House and the MMO of any failure of the aids to navigation and the timescales and plans for remedying such failures, as soon as possible and no later than 24 hours following the undertaker becoming aware of any such failure.	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No





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Mon_063_033_020623	S42	Email	Colouring of structures: 1) Except as otherwise required by Trinity House the undertaker must paint all structures forming part of the authorised project yellow (colour code RAL 1023) from at least HAT to a height as directed by Trinity House. Unless the MMO otherwise directs, the undertaker must paint the remainder of the structures grey (colour code RAL 7035).	A new condition 14 has been added to address this comment. Details will be provided to NRW under condition 14 of the dML.	No
Mon_063_034_020623	S42	Email	Construction Monitoring 1) Construction monitoring must include vessel traffic monitoring by automatic identification system for the duration of the construction period. An appropriate report must be submitted to the MMO, Trinity House and the MCA at the end of each year of the construction period.	Condition 25 requires the undertaker to do vessel monitoring in accordance with a vessel traffic monitoring strategy which must be submitted for approval under condition 18(1)(I). Details will be provided to NRW under condition 25 of the dML.	No
Mon_063_035_020623	S42	Email	Post-construction plans and documents The undertaker must conduct a swath bathymetric survey to IHO Order 1a of the installed export cable route and provide the data and survey report(s) to the MCA and UKHO. The MMO should be notified once this has been done, with a copy of the Report of Survey also sent to the MMO.	Condition 26 requires the undertaker to do swath-bathymetry survey postconstruction. Details will be provided to NRW under condition 26 of the dML.	No
Mon_063_036_020623	S42	Email	2)On post decommissioning, the undertaker must conduct a swath bathymetric survey to IHO Order 1a of the cable route and the installed generating assets area and provide the data and survey report(s) to the MCA and UKHO. [Decommissioning is not consented at this stage so this can't be included in the DCO/DML]	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_063_037_020623	S42	Email	This should fulfil the requirements of MGN654 and its supporting 'Hydrographic Guidelines for Offshore Renewable Energy Developers', which includes the requirement for the full density data and reports to be delivered to the MCA and the UKHO for the update of nautical charts and publications.	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_063_038_020623	S42	Email	3) Post construction monitoring must include vessel traffic monitoring by automatic identification system for a duration of three consecutive years following the completion of construction of authorised project, unless otherwise agreed in writing by the MMO. An appropriate report must be submitted to the MMO, Trinity House and the MCA at the endof each year of the three year period.	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_063_039_020623	S42	Email	Completion of Construction (1) The undertaker must submit a close out report to the MMO, MCA, UKHO and the relevant statutory nature conservation body within three months of the date of completion of construction. The close out report must confirm the date of completion of construction and must include the following details—	Condition 28 requires the submission of a close-out report. Details will be provided to NRW, MCA, Trinity House, UKHO and the statutory nature conservation body under condition 28 of the dML.	No
Mon_063_040_020623	S42	Email	(2) the final number of installed wind turbine generators;	Condition 28 requires the submission of a close-out report. Details will be provided to NRW, MCA, Trinity House, UKHO and the statutory nature conservation body under condition 28 of the dML.	No
Mon_063_041_020623	S42	Email	(3) as built plans; and	Condition 28 requires the submission of a close-out report. Details will be provided to NRW, MCA, Trinity House, UKHO and the statutory nature conservation body under condition 28 of the dML.	No
Mon_063_042_020623	S42	Email	(4) latitude and longitude coordinates of the centre point of the location for each wind turbine generator and offshore platform, substation, booster station and meteorological mast; provided as Geographical Information System data referenced to WGS84 datum.	Condition 28 requires the submission of a close-out report. Details will be provided to NRW, MCA, Trinity House, UKHO and the statutory nature conservation body under condition 28 of the dML.	No





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Mon_063_043_020623	S42	Email	(5) latitude and longitude coordinates of the interarray and export cable routes; provided as Geographical Information System data referenced to WGS84 datum.	Condition 28 requires the submission of a close-out report. Details will be provided to NRW, MCA, Trinity House, UKHO and the statutory nature conservation body under condition 28 of the dML.	No
Mon_063_044_020623	S42	Email	NOTE: These are standard conditions to be applied to all DMLs, other maybe requested for site specific projects.	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_064_001_020623	S47	Email	The UK Chamber of Shipping (hereafter "the Chamber") welcomes the opportunity to comment on the Section 42 Preliminary Environmental Information Report(PEIR)consultation for the aforementioned proposed developments. The Chamber is providing a singular response to the consultations for all three proposed developments as it is the cumulative impact of them that is of grave concern to the shipping industry with the resulting navigational risk.	The Applicant notes your response.	No
Mon_064_002_020623	S47	Email	The Chamber is the primary trade association for the UK shipping industry and its voice. The Chamber represents more than 200 members, operating in excess of 900 vessels equalling 18 million GT in capacity, trading around the UK and globally. Chamber members operate across the full breadth of the industry, including: containers, dry bulk and tanker trades; passenger transport, comprised of international and domestic cruise & ferry operators, including lifeline services; offshore supply and construction engaged in oil & gas and renewables; towage and specialist operations; along with professional service providers supporting the shipping industry.		No
Mon_064_003_020623	S47	Email	The Chamber is a firm advocate for the UK's targets to decarbonise the country and reach net zero by 2050, a target the Chamber supports the UK Government in pushing the global shipping industry to also adopt. Offshore renewables will become a significant source of green energy and the Chamber supports the Government's targets for offshore wind, whilst championing the vital role the ports and shipping industries play in enabling those targets to be achieved. The shipping industry and supporting ports are essential to facilitate the proliferation of offshore renewables throughout the lifespan of developments during construction, operation & maintenance, and decommissioning.	The Applicant notes your response.	No
Mon_064_004_020623	S47	Email	In order to achieve the Government's targets the planning and consultation system must support both the UK's offshore renewable goals and the shipping industry to ensure that navigational safety is not compromised nor economic contribution from the shipping industry jeopardised. This is a clear policy of the National Policy Statement for Renewable Energy EN-3 and it is apparent from the shipping and navigation related chapters of PEIR as presented, for example the risk ratings within the NRAs, that these projects would introduce unacceptable risks to safety and detrimental economic impact upon key shipping services.		No
Mon_064_005_020623	S47	Email	On this basis the Chamber wishes to provide comment in a number of areas, highlight concerns, and call for further commitments to mitigate risk from the proposed developments.	The Applicant notes your response.	No
Mon_064_006_020623	S47	Email	Planning& Consultation Process The Chamber has engaged throughout and extensively with the planning and consultation process to date, representing the concerns of its member operators directly impacted, and holistically considering the cumulative impact to the shipping industry.	The Applicant notes your response.	No





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Mon_064_007_020623	S47	Email	The Chamber commends the establishment of the Maritime Navigation Engagement Forum (MNEF) as a regular means of collective engagement between stakeholders and strongly welcomed the approach taken in conducting Navigational Simulator exercises at HR Wallingford with the major impacted ferry operators as a means of simulating ferry crosses and analysing navigational safety in differing climatic and traffic scenarios. Whilst there are caveats to the simulator exercises and some inaccuracies, nevertheless it was a positive undertaking and should be utilised for future developments.	The Applicant notes your response.	No
Mon_064_008_020623	S47	Email	The results of the simulator exercises along with the risk ratings as calculated in the Cumulative Regional Navigational Risk Assessment (CRNRA) show that there are unacceptable risks to navigational safety and that changes to the design envelope are required.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_064_009_020623	S47	Email	The Chamber and other MNEF members were informed of specific and tangible changes to the Project Design Envelope (PDE) including Red Line Boundary (RLB) changes in January 2023. It is therefore highly frustrating and should be criticised that the developers have proceeded to progress to PEIR consultation showing a PDE and RLB for the array areas which are out of date and incorrect. Through this course of action, the developers are negating and demeaning one of vital public and formal consultation periods, and lessening the feedback that will be submitted by stakeholders who are aware of the incoming changes.	The EIA process has been used as a means of informing the design through an ongoing iterative design process. This iterative approach involves a feedback loop, whereby potential impacts are initially assessed, and, if this is deemed to result in a significant adverse effect, changes to the project design are made (where reasonably practicable), to avoid, reduce or offset the magnitude of that impact. This approach is described within Volume 1, Chapter 5: EIA methodology of the Environmental Statement. Through carrying out the draft EIA which formed the PEIR, the magnitude and significance of potential impacts to shipping and navigation receptors were identified and understood (alongside potential impacts to a number of other physical, biological and human environment receptors), and this led to changes to the project design to reduce the impact significance for the Application. The EIA process leading to the preparation of the PEIR took place over a period of nearly one year, with the project design refinements being confirmed towards the latter stages of PEIR production, once the potential impacts were understood. In parallel to the EIA process, stakeholder consultation through the Maritime Navigation Engagement Forum (MNEF) has enabled early discussion and assessment of the revised boundaries, including through a further hazard workshop, which has informed the ES supporting the Application.	
Mon_064_010_020623	S47	Email	For those stakeholders providing feedback who are unaware of the developers' commitments to redefine the PDE and RLB of the proposed developments, their valuable time is being wasted and the Chamber will be recommending the Planning Inspectorate to fully consider and appraise the validity of the entire Section 42 consultation for these developments given the out of date and incorrect data presented.	The EIA process has been used as a means of informing the design through an ongoing iterative design process. This iterative approach involves a feedback loop, whereby potential impacts are initially assessed, and, if this is deemed to result in a significant adverse effect, changes to the project design are made (where reasonably practicable), to avoid, reduce or offset the magnitude of that impact. This approach is described within Volume 1, Chapter 5: EIA methodology of the Environmental Statement. Through	





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				carrying out the draft EIA which formed the PEIR, the magnitude and significance of potential impacts to shipping and navigation receptors were identified and understood (alongside potential impacts to a number of other physical, biological and human environment receptors), and this led to changes to the project design to reduce the impact significance for the Application. The EIA process leading to the preparation of the PEIR took place over a period of nearly one year, with the project design refinements being confirmed towards the latter stages of PEIR production, once the potential impacts were understood. In parallel to the EIA process, stakeholder consultation through the Maritime Navigation Engagement Forum (MNEF) has enabled early discussion and assessment of the revised boundaries, including through a further hazard workshop, which has informed the ES supporting the Application.	
Mon_064_011_020623	S47	Email	The Chamber wishes to raise further concern regarding the validity of the second round of Navigational Simulator exercises presently being undertaken by the developer with the regular ferry operators in attendance. Whilst such exercises are being carried out to include the additional commitments from the developers and redefined RLBs as informed to the MNEF in January, they fail to consider any feedback and views that are submitted during the PEIR consultation process	The EIA process has been used as a means of informing the design through an ongoing iterative design process. This iterative approach involves a feedback loop, whereby potential impacts are initially assessed, and, if this is deemed to result in a significant adverse effect, changes to the project design are made (where reasonably practicable), to avoid, reduce or offset the magnitude of that impact. This approach is described within Volume 1, Chapter 5: EIA methodology of the Environmental Statement. Through carrying out the draft EIA which formed the PEIR, the magnitude and significance of potential impacts to shipping and navigation receptors were identified and understood (alongside potential impacts to a number of other physical, biological and human environment receptors), and this led to changes to the project design to reduce the impact significance for the Application. The EIA process leading to the preparation of the PEIR took place over a period of nearly one year, with the project design refinements being confirmed towards the latter stages of PEIR production, once the potential impacts were understood. In parallel to the EIA process, stakeholder consultation through the Maritime Navigation Engagement Forum (MNEF) has enabled early discussion and assessment of the revised boundaries, including through a further hazard workshop, which has informed the ES supporting the Application.	
Mon_064_012_020623	S47	Email	The Chamber considers this a significant failing. The Chamber raised this very concern at the January 2023 Maritime Navigation Engagement Forum (MNEF),that to undertake the Navigational Simulator exercises prior to the completion of PEIR and analysis of the feedback submitted, could see important factors or impacts omitted and if so, invalidate the simulator exercises. The Chamber advocated at the time that all additional simulator exercises be undertaken post PEIR period and analysis, yet this recommendation has been overlooked.	The EIA process has been used as a means of informing the design through an ongoing iterative design process. This iterative approach involves a feedback loop, whereby potential impacts are initially assessed, and, if this is deemed to result in a significant adverse effect, changes to the project design are made (where reasonably practicable), to avoid, reduce or offset the magnitude of that impact. This approach is described within Volume 1, Chapter 5: EIA methodology of the Environmental Statement. Through carrying out the draft EIA which formed the PEIR, the magnitude and significance of potential impacts to shipping and navigation receptors were identified and understood (alongside potential impacts to a number of other physical, biological and human environment receptors), and this led to changes to the project design to reduce the impact significance for the Application. The EIA process leading to the preparation of the PEIR took place over a period of nearly one year, with the project design refinements being confirmed towards the latter stages of PEIR production, once the potential impacts were understood. In parallel to the EIA process, stakeholder consultation through the Maritime Navigation Engagement Forum (MNEF) has enabled early discussion and assessment of the revised boundaries, including through a further hazard workshop, which has informed the ES supporting the Application.	





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Mon_064_013_020623	S47	Email	The Chamber is furthermore disappointed and frustrated that the developers have chosen to undertake the second series of Navigational Simulator exercises at a seasonal period of the year, when one of the key ferry operators impacted, Isle of Man Steam Packet, is operating at its busiest due to the Isle of Man TT festival. The TT festival brings tens of thousands of people to the Isle of Man and accordingly means the ferry operator is working at full capacity to ensure the safe and efficient transport of competitors, spectators and all of their accompanying vehicles and equipment. The dates of the TT festival are well known well in advance and to hold simulator exercises for that specific operator whilst they are at their busiest period of year, thereby putting them in a very difficult position in determining whether they are able to attend is deeply regrettable and should be criticised.		No
Mon_064_014_020623	S47	Email	The Chamber therefore calls upon the developer to find alternative dates for such an exercise which will allow the key Masters and officers to attend.	Following feedback from the Isle of Man Steam Packet Company, the navigation simulations session for the ES was held in September 2023 to ensure they were able to attend and input to the simulations.	No
Mon_064_015_020623	S47	Email	Commercial and Environmental Impact As stated in Paragraph 2.6.162 of NPS EN-3 states: "Site selection should have been made with a view to avoiding or minimising disruption or economic loss to the shipping and navigational industries."	The Applicant notes your response.	No
Mon_064_016_020623	S47	Email	The above statement cannot be agreed with based on the proposed developments as presented at PEIR.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_064_017_020623	S47	Email	The Irish Sea is utilised by several key lifeline ferry services, connecting the mainland to Northern Ireland, the Republic of Ireland and the Isle of Man. In some cases these routes have been in operation for nearly 200 years providing an essential supply link to island communities. These services operate to a schedule and disruption to their routeing, which already occurs to a degree of regularity due to severe adverse weather will only be further exacerbated through deviation and detour.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are	





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				reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_064_018_020623	S47	Email	Through disruption, passage times increase, and operators may face difficulty in maintaining published schedules on services. This would impact upon berthing times and occupation in ports, where berth space is limited. Furthermore, recognising the regular occurrence of adverse weather in the Irish Sea particularly during winter months, operators are required to regularly undertake weather routeing. Weather routeing is done for a variety of reasons, including vessel safety, cargo safety to mitigate risk of cargo shift, and most regularly for ferry services, passenger comfort and safety.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_064_019_020623	S47	Email	The NRA identified that weather routeing in the area occurring with far more regularity that seen elsewhere in UK waters for regular scheduled services, and this should be given the utmost weight and importance when considering the impact of removing large areas of navigable sea room from use. In doing so, the proposed developments will remove one of the main mitigations that operators use to reduce safety risk and improve passenger comfort. Without it, customer satisfaction is reduced with potential knock on commercial impact to alternative transport means.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_064_020_020623	S47	Email	Scheduled RoRo services operate as part of a highly efficient just in time supply chains, with raw materials, semi-manufactured, and manufactured products repeatedly crossing borders as part of the production process. Disruption to schedules and delays have a detrimental impact upon wider supply chains, decreasing customer satisfaction, and leading shippers to consider alternative arrangements (where available), including repositioning or modal shift. Similarly turn-around times in ports are optimised for the loading and discharge of cargo units and cannot necessarily be shortened due to increased passage time.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are	



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				reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_064_021_020623	S47	Email	Any the increase in route length would require more fuel to be burnt, therefore resulting in significant additional financial cost to the operator from the deviation whilst increasing environmental emissions. It should be noted that ships are designed to sail at specific speeds at which they are most efficient, operating them out of such parameters increases costs, inefficiency and may not be technically feasible due to the introduction of specific environmental legislation to the shipping industry, in particular Carbon Intensity Indicators (CII) and Energy Efficiency eXisting ship Index (EEXI). Vessel operators may therefore may not have the opportunity to increase speeds to maintain schedules but forced to disrupt them with knock-on effects to the wider supply chain.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_064_022_020623	S47	Email	Such impacts the Chamber does not consider having been examined in detail not mitigations proposed through the documentation as presented at PEIR.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_064_023_020623	S47	Email	Cumulative Impact The Chamber asserts that the CRNRA as presented is incomplete and inaccurate. The most clear and obvious omission is that of the proposed Isle of Man Wind Farm proposed by Orsted within the territorial waters of the Isle of Man.	The Mooir Vannin Offshore Wind Farm is considered in Volume 6, Annex 7.2: Cumulative Regional Navigational Risk Assessment of the Environmental Statement.	No
Mon_064_024_020623	S47	Email	As raised at the Navigational Risk Assessment workshops by the Isle of Man Government representative, Orsted have every intention of proceeding with the proposed development yet the analysis shown at PEIR fails to consider this and the routeing and navigational safety implications.	The Mooir Vannin Offshore Wind Farm is considered in Volume 6, Annex 7.2: Cumulative Regional Navigational Risk Assessment of the Environmental Statement.	No
Mon_064_025_020623	S47	Email	As such the Chamber expects the development will be included in the cumulative assessment going forward.	The Mooir Vannin Offshore Wind Farm is considered in Volume 6, Annex 7.2: Cumulative Regional Navigational Risk Assessment of the Environmental Statement.	No
Mon_064_026_020623	S47	Email	Conclusion The Chamber welcomes this opportunity to respond to the Section 42 PEIR consultation however reiterates its assertion that the proposed developments	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These	Yes





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			fail to satisfy Paragraph 2.6.147 of EN-3, which states, "To ensure safety of shipping, it is Government policy that wind farms should not be consented where they would pose unacceptable risks to navigational safety after mitigation measures have been adopted."	impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_064_027_020623	S47	Email	The Chamber and its members look forward to engaging with the developers to appraise the additional commitments and risk mitigations and their impact to navigational safety, economic impact to the shipping industry and wider supply chains, and environmental impact.		No
Mon_064_028_020623	S47	Email	Therefore, whilst the Chamber is in overall support for offshore wind developments, it can only presently object to the developments as proposed in the PEIR documentation.	The Applicant notes your response.	No
Mon_069_007_010623	S42	Email	Shipping and 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. These are strategic, lifeline routes that the Island depends on and it is essential that these are not impacted upon as part of these proposals. The economy of the Island is highly reliant on the regular, safe shipping for its goods, and any deviations from well established timetables and routes would not support the Island's business community relying on daily deliveries via the Isle of Man Steam Packet Company.	The Applicant notes your response.	No
Mon_069_008_010623	S42	Email	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 application and forthcoming EIA. It is essential that the Island's shipping companies, the Isle of Man Steam Packet Company and other shipping companies are continuously engaged throughout this process.	The developers of the Mona, Morgan and Morecambe Offshore Wind Projects have recognised the potential cumulative impacts on shipping and navigation to both commercial and safety receptors. As such, a Cumulative Regional NRA (CRNRA) was undertaken collaboratively by the three projects and is included as an appendix to the NRA (volume 2, annex 7.1). All Irish Sea ferry companies have been involved in consultation during the development of the NRA and CRNRA, including attending navigation simulations and hazard workshops.	Yes
Mon_069_009_010623	S42	Email	The TSC believes these well-established sea links including the safe passage of all vessels navigating these routes should be given appropriate weight as part of this assessment, and subsequent examination. Any deviations to these lifeline routes will be unacceptable for an Island nation entirely dependent on its well established sea links and lifeline ferry services. The TSC would therefore oppose any deviations to these lifeline routes at every opportunity throughout this process.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom	





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				and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_069_010_010623	S42	Email	Orsted proposed offshore windfarm agreement for lease - The TSC wishes to point out that there is an Afl with Orsted 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 (committed and proposed). This is particularly of interest with respect to the hard constraints identified by The Crown Estate in Table 4.1 (in Site Selection Chapter) It is acknowledged that the Orsted site is not related to a Crown Estate lease, however, the principles of proximity should continue to apply and it should have been included for context.	The Mooir Vannin Offshore Wind Farm Scoping Report was published in October 2023. Accordingly, the Mooir Vannin Offshore Wind Farm is considered in the cumulative effects assessment as a Tier 2 project, where relevant.	No
Mon_069_011_010623	S42	Email	The site was raised in a response from the Isle of Man Government in respect of the Scoping Opinion previously submitted as part of the TSC's response to the Planning Inspectorate, so why then was one of the underlying assumptions as part of the Hazard Risk Navigation Assessment Scenarios at the stakeholder workshop in October 2022 in Liverpool that the offshore windfarm project in Manx waters was not going to proceed?	The Mooir Vannin Offshore Wind Farm is considered in Volume 6, Annex 7.2: Cumulative Regional Navigational Risk Assessment of the Environmental Statement.	No
Mon_069_012_010623	S42	Email	The TSC is disappointed that this site has been omitted from the cumulative assessment specifically in respect of shipping and navigation, one of the major issues that will need to be resolved as part of the cumulative impact of all Round 4 proposed offshore windfarms. Given that it has not taken into account this site, the TSC does not believe a full cumulative impact assessment for shipping and navigation has been undertaken and this should be reconsidered. The 0rsted site has the potential to remove a large section of open water from being able to be used for safe passage for ships which may have cause to be diverted from their established routes as a result of the Round 4 sites as is being proposed as part of the Shipping and Navigation Risk Assessment, and indeed, any action that may be required of the Masters as per any adverse weather conditions.	Statement.	No
Mon_069_229_010623	S42	Email	Chapter 12 –Shipping and Navigation There is much concern in respect of the potential impact that the proposed project could have on shipping and navigation, particularly in respect of the Island's lifeline services via the Isle of Man Steam Packet Company. 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 the subsequent EIA to be submitted as part of the Development Consent Order application.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_069_230_010623	S42	Email	The TSC appreciates that the Isle of Man Steam Packet Company (IOMSPC) has until now been kept involved in this process including early project	The developers of the Mona, Morgan and Morecambe Offshore Wind Projects have recognised the potential cumulative impacts on shipping and	No





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			consultation meetings, and involvement in the navigational bridge simulations. It is essential that the Island's shipping companies, the Isle of Man Steam Packet Company and other shipping companies are continuously engaged throughout this process.	navigation to both commercial and safety receptors. As such, a Cumulative Regional NRA (CRNRA) was undertaken collaboratively by the three projects and is included as an appendix to the NRA (volume 2, annex 7.1). All Irish Sea ferry companies have been involved in consultation during the development of the NRA and CRNRA, including attending navigation simulations and hazard workshops.	
Mon_069_231_010623	S42	Email	Representatives from the TSC have been involved in the Maritime Navigation Engagement Forum encompassing all the neighbouring Round 4 offshore windfarm sites, and will continue throughout the duration of this process. Issues were raised in that forum as to the underlying assumption for some of the navigational simulations undertaken for the ferry operators that the proposed offshore windfarm in Manx waters was not being progressed. This has been clarified and corrected, and is understood that progress is being made by Ørsted on the offshore windfarm. In addition, there are further ambitions to develop offshore windfarms in Manx waters in the future. However, the TSC notes with disappointment that this offshore windfarm site has not been included within any of the PEIR Shipping and Navigation maps, nor forming part of the overall cumulative impact assessment, something which the TSC strongly disagrees with. This is further discussed below.	The Mooir Vannin Offshore Wind Farm is considered in Volume 6, Annex 7.2: Cumulative Regional Navigational Risk Assessment of the Environmental Statement.	No
Mon_069_232_010623	S42	Email	The TSC notes that as part of site selection process, consideration had to have been given to shipping and navigation routes (para 4.5.3.2). The TSC requests that continued consideration is given to these issues as concerns raised to date in terms of safety for shipping and navigation have not yet been fully explored or addressed as part of this PEIR. The TSC is pleased however to see that the waters on the east of the Isle of Man have been included within paragraph 12.1.3.2 outlining that they have been considered in terms of shipping routes and their interaction with the Mona Array and existing and planned offshore wind projects within this area for the cumulative effects assessment.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_069_233_010623	S42	Email	In terms of the data used for shipping, it should be noted in paragraph 12.4.4.17 where there is an acknowledgement that there are seasonal variations to the vessel numbers travelling through the Mona area, it should also clearly identify that it also includes a different vessel for which there will be additional limitations, namely that it is a fast craft, one that the TSC believes had limited testing as part of the bridge simulations, where the focus was mainly on that of the conventional ferry, the Ben my Chree. The TSC trusts that the IOMSPC is satisfied with the conclusions from the bridge simulations for its respective vessels.	At the navigation simulations with the Isle of Man Steam Packet (in 2022 for the PEIR and 2023 for the ES), it was agreed that the handling of the Manannan was not fully replicated when tested in adverse weather conditions. However, in normal conditions during which the ferry more frequently navigates, it was considered to be representative to test some of the key questions associated with the Irish Sea projects.	No
Mon_069_234_010623	S42	Email	Further clarification is sought on the period over which the non-typical ferry routes which include the IOMSPC have been taken as part of the 2019 AIS dataset (Figure 12.5). There should be an acknowledgement between the winter and summer surveys that there will likely be seasonal variations. The IOMSPC Douglas –Liverpool route is undertaken by the fast craft which is much more susceptible to variations in weather conditions, and when decisions as to its routeing are being made, passenger comfort ranks very high	In addition to the vessel traffic surveys, full years of AIS data has been utilised to capture the infrequent weather routeing. The extent of the data collected exceeds the requirements of the primary guidance document MGN654.	No





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			on the list of considerations. The normal weather route for Douglas Liverpool runs along the westerly boundary of the Mona Array area, whereas during periods of adverse weather, the Masters are forced to move that route to the eastern edge of the Mona Array Area, and many times, as shown in 12.5, the route has had to deviate through the Mona Array Area. The TSC suggests that if further clarification is required in respect of vessel movements, that the IOMSPC should be consulted for confirmation.		
Mon_069_235_010623	S42	Email	Of greatest concern to the TSC in respect of shipping and navigation is in respect of the impacts relating to the following impacts noting that these are impacts, as per the maximum design scenario over the duration of construction, operation and decommissioning equating to potentially 43 years disruption for the Isle of Man:	The Applicant notes your response.	No
Mon_069_236_010623	S42	Email	Impact to commercial operators including strategic routes and lifeline ferries (NPS EN-3 2.6.162/163)(under normal sailing conditions):Paragraph 12.8.3.3 sets out that vessel traffic will be expected to deviate around the construction site, and to include at least 1nm from navigational hazards (for up to 4 years during the construction period) –specific to the Douglas –Liverpool route resulting in a 0.01nm deviation around the northwestern boundary of the Mona Array Area.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_069_237_010623	S42	Email	Further clarification is required as to the categorisation of "commercial" and "ferry services" as it is noted that earlier in the chapter, there are references to commercial ferry services, which the TSC believes the IOMSPC is one. If the reference in respect of the "none of the commercial routes with more than one movement per day" is in respect of cargo or tankers, and not commercial ferry operators, the TSC requests that this is made explicitly clear in the subsequent EIA.	Within the NRA (volume 2, annex 7.1) and Shipping and Navigation Chapter (volume 2, chapter 7), a distinction is drawn between ferries (passenger and Ro-Ro) and commercial routes (including cargo and tanker trade) to reflect the greater risks and sensitivity for regular ferry routes carrying passengers. The impacts on the Isle of Man Steam Packet routes are detailed fully in the relevant sections of these documents.	No
Mon_069_238_010623	S42	Email	In terms of the assessment of the significance of the effect, further confirmation is required as to whether this has taken into account the cumulative impact of all proposed offshore windfarms within the Mona Array area, including the proposed offshore windfarm in Manx waters. It is not clear from Figure 12.7 whether the Ørsted Agreement for Lease site has been included as part of this consideration, as deviations proposed in the future less than 1 trip per day could be being proposed to reroute through that site in Manx waters.	The Mooir Vannin Offshore Wind Farm is considered in Volume 6, Annex 7.2: Cumulative Regional Navigational Risk Assessment of the Environmental Statement.	No
Mon_069_239_010623	S42	Email	It is noted that this expected deviation to the IOMSPC Douglas Liverpool route is to be applied during all phases of Mona –constructions, operation and decommissioning. Clarification is sought on proposed mitigation measures, as were expected to be included within PEIR.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise	Yes



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				the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_069_240_010623	S42	Email	Impact to adverse weather routeing (NPS EN-3 2.6.162/163/165). The TSC appreciates the acknowledgement for the construction phase in para 12.8.4.4 that "During adverse weather, some sailings are delayed or inevitably cancelled irrespective of the presence of the Mona Array Area. However, with the presence of the Mona Array Area, where sailings are safe to take place, they may be required to route a greater distance and duration. Over the course of a day, the aggregation of these delays would result in the potential for additional sailings to be cancelled where constraints such as hours of rest are exceeded. Such effects are already experienced by operators but the presence of the Mona Generation Assets may exacerbate this". This would be unacceptable for an Island nation entirely dependent on its well established sea links and lifeline ferry services. The TSC believes these well established sea links and routes should be given appropriate weight as part of this assessment, and subsequent examination.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_069_241_010623	S42	Email	Noting that it was estimated that the IOMSPC service between Douglas - Liverpool would be impacted at a significant wave height (Hs) of 1.6m and cancelled at 2m Hs; the frequency for which these conditions would be exceeded within a year are given as Liverpool to Douglas -Between 4.8% and 13.4% of sailings would require some weather routeing (average of 9.6%). Between 1.5% and 7.3% of sailings could be cancelled due to adverse weather (average of 4%). This has then been further estimated to equate to a base case estimate of 26 sailings cancelled would increase to 35 sailings cancelled with the Mona Generation Assets. This analysis suggests that there would be an additional 9 sailings per annum that would be affected during the construction phase (which estimated to take approx. 4 years, is 36 additional cancelled sailings). Again, further clarification is sought as to whether this estimate takes into account the impact the proposed windfarm could have in conjunction with the cumulative impact of the other Round 4 sites within close proximity to the Mona Array. The TSC requests confirmation that this has been discussed with the IOMSPC and that these estimates are taken to be as accurate as possible.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_069_242_010623	S42	Email	In terms of additional travel and comfort time to passengers, a required deviation in adverse weather already takes approx. 10-33 minutes, and with an additional 27minutes, as estimated, could result in journey times of up to 60minutes in worst cases on a 158minute journey. The TSC appreciates the acknowledgement that "It should be noted during the bridge navigation simulation it was verified that the Manannan is more sensitive to adverse weather conditions than conventional ro-ro ferries and therefore may be more likely to take adverse weather routes and be impacted by the presence of the Mona Array Area". The Manannan, as the IOMSCP fast craft is a seasonal	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with	





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			ferry, serving these routes for local Island residents, businesses and for tourism promotion for the Island. It is noted that it has different requirements to conventional ferries, however, it is unacceptable for this route, in adverse weather to face up to 60 minutes of a delay owing to the presence of the Mona Array.	boundary of the array areas for their respective projects to increase searoom	
Mon_069_243_010623	S42	Email	The TSC notes that "In addition to the impact on vessel routeing, the presence of the Mona Array Area reduces the optionality of vessels to maintain a safe and comfortable heading to the adverse conditions. A passage to the east of the Mona Array Area would require vessels to navigate beam on to the prevailing conditions, which is not considered seamanlike in adverse weather and could result in cargo shift. The navigation simulations noted excessive roll was experienced during adverse weather for ferries if routed to the east of Mona, without the capability to turn west into the prevailing conditions". Passenger comfort and safety is of paramount concern to the IOMSPC and this will have to be carefully considered by the IOMSPC in respect of these proposed deviations.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_069_244_010623	S42	Email	It is further noted that the same conclusions have been reached with regards both the operational and decommissioning phases of the Mona Array Area, therefore, the additional time for adverse weather conditions and subsequent rerouting for the IOMSPC, and the possibility of reduced levels of passenger comfort will apply for at least the next 43 years.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancellations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_069_245_010623	S42	Email	The TSC acknowledges that the magnitude of the impact is deemed to be medium and the sensitivity of the receptor is considered to be medium. The effect will, therefore, be of moderate adverse significance, which is significant in EIA terms. The TSC understands that this will be further explored as part of the subsequent EIA which will accompany the application.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the	





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				boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_069_246_010623	S42	Email	Impact on emergency response capability due to increased incident rates and reduced access for SAR responders (NPS EN-3 2.6.164). The TSC has concern over the statement that "adequate Closest Point of Approach (CPA) was not maintained between vessels during some specific situations". Further clarification is sought as to which specific situations the CPA was not maintained, and whether this took into account the cumulative impact of the other proposed R4 sites as well as the proposed Orsted Agreement for Lease site in Manx waters.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
				The Mooir Vannin Offshore Wind Farm is considered in Volume 6, Annex 7.2: Cumulative Regional Navigational Risk Assessment of the Environmental Statement.	
Mon_069_247_010623	S42	Email	The TSC acknowledges that no amendments to the site boundaries have been confirmed as part of the PEIR, however, it is pleased to see that there is a commitment to reconsider as set out in the Shipping and Navigation Chapter. The TSC expects continued involvement as the boundaries of the Mona Array Area is further explored and considered, and will expect that along with the IOMSPC, the issues raised as concerns of the Isle of Man will be fully taken into account as part of any future amendments. The TSC had however expected there to be more emphasis and greater detail provided on proposed mitigation measures for the impacts identified to date as part of the PEIR, particularly as set out in the Statement of Community Consultation whereby "It (the PEIR) also sets out measures that could prevent, reduce or offset any environmental effects, identified as part of early assessments and consultation". The TSC requests confirmation as to when consultation on such proposed mitigation measures will be undertaken prior to submission of DCO application.		
Mon_069_248_010623	S42	Email	Cumulative effect assessment methodology The TSC is concerned that the proposed offshore windfarm in Isle of Man territorial waters (currently with an Agreement for Lease with Ørsted) does not appear to have been taken into account as part of the shipping and navigation cumulative effect assessment. In previous correspondence to the Planning Inspectorate, in respect of all scoping opinions submitted for consideration for the Round 4 offshore windfarm sites, the Territorial Sea Committee made it clear that there was an Agreement for Lease with Ørsted for an offshore windfarm development including in the response in respect of Mona (31st May 2022), Mona	The Mooir Vannin Offshore Wind Farm is considered in Volume 6, Annex 7.2: Cumulative Regional Navigational Risk Assessment of the Environmental Statement.	No





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			(11thAugust 2022), Morecambe Bay (11th August 2022) and more recently, Mona and Morecambe Bay Transmission Assets (25thNovember 2022). Despite repeated statements from the TSC in respect of the Agreement for Lease for an offshore windfarm in Manx waters including supplying the data to adequately map it, based on the assessment criteria for Tier 2 and 3, there appears to be no consideration for a project which has had a scoping opinion submitted but not in the public domain, albeit it historically. An update in respect of this project could have been provided by the TSC at any stage had contact been made by the project teams requesting this information. The TSC is also concerned that this site is also not included on Figure 12.9 showing the key projects in respect of the assessment. The TSC is of the opinion that given the close proximity of the Agreement for Lease site to all round 4 offshore windfarm sites and the cumulative impact that all the sites could have on shipping and navigation, it must be taken into account as part of this assessment.		
Mon_069_249_010623	S42	Email	Impact to commercial operators including strategic routes and lifeline ferries The TSC notes that there is the potential for impact to both IOMSPC routes in terms of additional time in minutes per journey which will, from a commercial perspective add additional costs to the company in terms of fuel to be burned, and any requirements to additional emissions being offset. Conclusions suggest that there will be a 1minute addition to journey time for the Douglas – Liverpool route and a 4 minute addition to the Douglas –Heysham. This will require further confirmation from the IOMSPC.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_069_250_010623	S42	Email	Clarification is sought in respect of para 12.10.3.8 which states that the most impacted route is between Douglas and Liverpool TSS with an additional 5.9nm of steaming above 51.7nm. However, less than one vessel per week utilises this route. If this is in reference to the fast craft service using Manannan, there are occasions where there are two return daily trips during the spring / summer period. Any impacts to this service would not be acceptable as the timetable is designed on the crafts ability to undertake two return trips taking into account both passenger and staff welfare. This is essential for the Isle of Man's tourism industry, upon which the Island is heavily dependent. If it is, as has been previously been noted, a reference to a cargo or tanker, this should be made explicitly clear.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_069_251_010623	S42	Email	The TSC notes that the Ørsted site has been omitted from Figure 12.10 showing the proposed deviations around Mona and Morgan Array areas for the various ferry operators. Until such times as this site is taken into account as part of the cumulative impact assessment, the TSC cannot accept all the	The Mooir Vannin Offshore Wind Farm is considered in Volume 6, Annex 7.2: Cumulative Regional Navigational Risk Assessment of the Environmental Statement.	No



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			conclusions presented, particularly those proposed deviations presented in Figure 12. 11. ,		
Mon_069_252_010623	S42	Email	Impact on adverse weather routeing The TSC appreciates the acknowledgement for the construction phase in para 12.10.4.4 that "During adverse weather, some sailings are delayed or inevitably cancelled irrespective of the presence of the Mona Array Area. However, with the presence of the cumulative impacts, where sailings are safe to take place, they may be required to route a greater distance and duration. Over the course of a day, the aggregation of these delays would result in the potential for additional sailings to be cancelled where constraints such as hours of rest are exceeded. Such effects are already experienced by operators but the presence of the Mona Generation Assets may exacerbate this". Again, as before, the TSC finds that this would be unacceptable for an Island nation entirely dependent on its well established sea links and life line ferry services.		
Mon_069_253_010623	S42	Email	Noting that it was estimated that the IOMSPC service between Liverpool and Douglas would be impacted at a significant wave height (Hs) of 1.6m and cancelled at 2m Hs; the frequency for which these conditions would be exceeded within a year are given as Isle of Man Steam Packet Company route between Liverpool to Douglas: Between 4.8% and 18.3% of sailings would require some weather routeing (average of 9.6%). Between 1.5% and 7.3% of sailings could be cancelled due to adverse weather (average of 4%). In addition, the Isle of Man Steam Packet route between Heysham to Douglas, Between 3.7% and 13.4% of sailings would require some weather routeing (average of 9.6%). Between 0.3%and 3.7% of sailings could be cancelled due to adverse weather (average of 1.5%). This analysis suggests that a base case estimate (for the Liverpool Douglas route) of 26 sailings cancelled would increase to 35 sailings cancelled with the cumulative projects whilst the base case estimate (for Heysham to Douglas route) of 23 sailings cancelled would increase to 30 sailings cancelled with the cumulative projects. The TSC requests confirmation that this has been discussed with the IOMSPC and that these estimates are taken to be as accurate as possible.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_069_254_010623	S42	Email	The TSC notes, as per Table 12.25, with regards to additional travel and comfort time to passengers, a required deviation (on the Douglas to Liverpool) in adverse weather already takes approx. 10-33 minutes, and with an additional 27minutes, as estimated, which could result in journey times of up to 60 minutes in worst cases. With regards the Douglas to Heysham route, a required deviation in adverse weather already takes approx. 10-23 minutes, and with an additional 17 minutes, as estimated, which could result in journey times of up to 40 minutes. The potential for these additional minutes to the journey times are not considered acceptable by the TSC for a number of reasons; the IOMSPC timetable and its vessels have been carefully selected and planned to ensure the maximum number of trips to be undertaken safely, and with the highest level of passenger comfort possible. The IOMSPC Douglas to Heysham route provides many of the Island's businesses with their fresh supplies, all of which are designed to be distributed within a very short period of time after the boat docks as part of a just in time economy. Any deviations from this timetable will not be accepted by these businesses and by the TSC and those it represents. In addition, the extra time that could be	cancellations to lifeline ferry services. Following the PEIR and \$42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are	





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			added to the fast craft sailing will not be acceptable, either to the Island's residents or to its visitors who are using that service for its speed. Again, the timetable has been carefully planned around the fast crafts ability and reliability on this route, and to add up to an additional hour (from worst case at 33 minutes currently) will not be accepted. It is further acknowledged that owing to the nature of the fast craft, Manannan, it will likely be impacted more during periods of adverse weather than other ferries operating in the area.		
Mon_069_255_010623	S42	Email	Further noting "the presence of the Mona Array Area reduces the optionality of vessels to maintain a safe and comfortable heading to the adverse conditions. A passage between the Mona Array Area and Walney Offshore Wind Farm would require vessels to navigate beam on to the prevailing conditions, which is not considered seamanlike in adverse weather and could result in cargo shift. The navigation simulations noted excessive roll was experienced during adverse weather for ferries if routed to the east of Mona, without the capability to turn west into the prevailing conditions". This is also not acceptable to assume that the IOMSPC will feel it appropriate and responsible to sail between the Mona Array Area and Walney Offshore Wind Farm in those adverse weather conditions knowing that it will not make a passenger journey comfortable.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_069_256_010623	S42	Email	It is further noted that the same conclusions have been reached with regards both the operational and decommissioning phases of the Mona Array Area, therefore, the additional time for adverse weather conditions and subsequent rerouting for the IOMSPC, and the possibility of reduced levels of passenger comfort will apply for at least the next 43years.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_069_257_010623	S42	Email	The TSC acknowledges that the magnitude of the impact is deemed to be medium and the sensitivity of the receptor is considered to be high based on the impact it could have on the Isle of Man. The effect will, therefore, be of moderate adverse significance, which is significant in EIA terms. The TSC understands that this will be further explored as part of the subsequent EIA which will accompany the application.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom	





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				and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_069_258_010623	S42	Email	In the absence of the Agreement for Lease site for offshore wind development in Manx waters being included as part of this cumulative impact assessment, and its notable absence from maps, it is difficult for the TSC to support the proposed deviated route for Stena in Figure 12.12 which would appear to transit directly through this site. As acknowledged throughout this Chapter, there is an accepted clearance distance that is taken into account for obstructions such as the Mona Array, taken to be 1.5nm—the deviation shown in this figure rather proposes that the Stena route would be deviated, to clear Mona, but sends it through the Ørsted site in Manx waters. The TSC seeks further clarification as to whether this proposed deviation has taken account of the Agreement for Lease, and if it has, how can this deviation be proposed knowing that it might not be possible in future years?	The Mooir Vannin Offshore Wind Farm is considered in Volume 6, Annex 7.2: Cumulative Regional Navigational Risk Assessment of the Environmental Statement.	No
Mon_069_259_010623	S42	Email	The TSC awaits continued engagement to explore the further mitigation measures and residual effects to be considered and proposed by the project teams, particularly in respect of shipping and navigation. The TSC is deeply concerned about the cumulative impact all of these offshore windfarms could have on its lifeline services and any deviations to well established routes will not be accepted. The TSC awaits further confirmation on the revisions to the Mona Array Area boundary as outlined in paragraph 12.14.1.2.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_069_260_010623	S42	Email	The Navigational Risk Assessment The Navigational Risk Assessment includes a summary of a number of main, overarching concerns that the TSC wishes to repeat here as all are applicable in respect of shipping and navigation for the Isle of Man, including, but not limited to:	The Applicant notes your response.	No
Mon_069_261_010623	S42	Email	Existing IOMSPC schedules have been developed to accommodate the maximum number of journeys within a 24hr period, taking into account the length of journey, weather conditions, comforts of passengers as well as the demands upon the service and the just in time nature of Manx requirements. In addition, there are requirements on the IOMSPC in respect of its staff from the Maritime Labour Convention so appropriate rest times are scheduled and taken into account as part of the scheduling of services. Turnaround times in ports are limited on both sides owing to a number of conditions, and again, the operators are working within those. Any undue delay to arrivals and departures could result in financial penalties, and who would be responsible for covering those is the delays were due to deviations from well established routes as a result of the Mona Array, or indeed, the cumulative impact of all the shipping? In additional Heysham presents additional restrictions in terms of tide times,	cancellations to lifeline ferry services. Following the PEIR and \$42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and	





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			and access / manoeuvrability within the harbour. All of this must be taken into account by the Masters as part of their preparation.	at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	,
Mon_069_262_010623	S42	Email	In addition, the TSC will repeat a point it has made on a number occasions in respect of the cumulative impact, and that is the Agreement for Lease site for an offshore windfarm in Manx territorial waters has not been included as part of the baseline data in the Navigational Risk Assessment, the cumulative impact assessment nor the maps that have been used to depict other infrastructure constraints in the vicinity of the proposed Mona Array Area.	The Mooir Vannin Offshore Wind Farm is considered in Volume 6, Annex 7.2: Cumulative Regional Navigational Risk Assessment of the Environmental Statement.	No
Mon_069_263_010623	S42	Email	In terms of specific timings in respect of both journey times and turnaround times, the TSC requests that further discussions are held with the IOMSPC to ensure that they have been accurately recorded as part of the baseline data, and have been applied accurately as part of the assessment, both for the normal and the adverse weather conditions as well as for Mona and the wider, cumulative impact assessment.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_069_264_010623	S42	Email	In addition, any deviations or additional travelling time will result in additional fuel being used, and again, who is covering that cost? Who is also taking into account the increased emissions levels that could result from this additional travelling time, and extra fuel? Who would then be required to offset these? It shouldn't be the operator as the deviation is not their choice, nor should it be the IOMSPC passengers, who again, aren't going to benefit from Mona or any of the other UK offshore windfarm projects.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_070_027_010623	S42	Email	3. Potential use of Holyhead Port It is noted that the PEIR does not specify the final selection of ports, potential manufacturing and fabrication facilities, and delivery models required for the Morgan Offshore Wind Project. It is understood that BP and EnBW is currently exploring options in relation to ports, supporting infrastructure and labour markets in order to understand the potential capabilities, capacities and availability that exists.	A single port or multiple ports could be used to support the Mona Offshore Wind Project. The final port(s) have not been chosen at the time of application.	Yes





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Mon_070_028_010623	S42	Email	It is welcomed that Holyhead Port is included on the long list of ports that have been identified as part of the both the construction/decommission and operations and maintenance phases.	The Applicant notes your response.	Yes
Mon_070_029_010623	S42	Email	With nearly 500,000 vehicles and 2 million foot passenger going through the Port each year, Holyhead Port is the second busiest ferry port in the UK. It handles over 70% of all road traffic moving between Ireland and Wales and is supported by the E22 arterial route between mainland Europe and Dublin. Stena Line Ports Ltd own and operate the port of Holyhead. Holyhead port is non-tidally restricted and is operational 24hrs / 365 days per year.	The Applicant notes your response.	Yes
Mon_070_030_010623	S42	Email	In addition to ferry operations, the port has a wealth of experience in specialist handling of large project related cargoes. It has a deep-water berth as well as smaller berths and standage areas. The Port's experience includes serving windfarm vessels, jack-up rigs and support vessels, including handling abnormal Indivisible Loads. Recently, Stena Line Ports Ltd constructed a Manufacturing and Assembly Hall for the green energy supplier, Minesto Ltd, to enable construction of their offshore power generation equipment.	The Applicant notes your response.	Yes
Mon_070_031_010623	S42	Email	A joint Freeport Bid between the Council and Stena Line has recently been successful. The Freeport will eliminate barriers to trade and provide easements that simplify how businesses can operate which brings significant new investment and additional funding streams to help develop new infrastructure.	The Applicant notes your response.	Yes
Mon_070_032_010623	S42	Email	Anglesey is already a hub for the creation of sustainable energy, with our coastline pioneering some industry-leading initiatives which are driving the UK towards its net zero objectives. The Council is confident that the freeport status will support in creating a business environment that is appealing for potential investors and businesses within the energy sector.	The Applicant notes your response.	Yes
Mon_070_033_010623	S42	Email	Being a non-tidally restricted Port, with 24 hour / 365 day operation and having the required experience and facilities to accommodate such a project, the Council believes that the Port of Holyhead would be well suited to meet the development requirements of the Morgan Wind farm project.	The Applicant notes your response.	Yes
Mon_070_034_010623	S42	Email	We are aware that you are already engaging with Stena Line Ports and we trust that this engagement will continue in order to ensure that the opportunity at Holyhead is fully explored. The Councils is happy to assist with any discussions as required.	The Applicant notes your response.	Yes
Mon_070_039_010623	S42	Email	However, the SLVIA notes that moderate adverse effects are identified for users of the Wales Coastal Path from several viewpoints selected across North Anglesey (see section 5 of the Councils response for further detail). In addition, it is considered there is a lack of any proposed mitigation or enhancement to address moderate and potentially significant adverse effects on views from the Wales Coast Path in the Anglesey AONB arising from the project and in conjunction with cumulative projects.	The Applicant notes your response	Yes
Mon_071_009_020623	S42	Email	Navigation and shipping The area of the proposed Mona Offshore Wind Project has significant amounts of existing shipping activity. The information provided in the PEIR is not clear on the extent to which and the location within which vessel activity would increase during both the construction and operational phases.	The NRA and Shipping and Navigation Chapter identify increased vessel movements both associated with the Mona Offshore Wind Project and wider macro-economic trends which have been used as the basis of the assessment. These are described in the NRA (volume 6, annex 7.1) and shipping and navigation chapter (volume 2, chapter 7) of the Environmental Statement.	Yes



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Mon_071_010_020623	S42	Email	Given there is no information currently available on vessel routes or proposed construction or O+M ports, it is difficult to understand the potential risks to assets associated with the generation and transmission of electricity from West of Duddon Sands. It is noted that Mona Offshore Wind Project's Navigation Risk Assessment finds that "the impacts of the Mona Generation Assets would result in a hazard with an Unacceptable navigational risk score and therefore additional risk control options are required."	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_071_011_020623	S42	Email	We would appreciate if more information on this could be provided so we can properly understand and respond to the potential impacts and mitigations being proposed. It is important that any solutions carefully consider existing consent conditions and agreements. We would also appreciate being given the opportunity to input into and participate in discussions around navigational risks and mitigations. Our concerns relate to: - Navigational safety in the vicinity of West of Duddon Sands including Search and Rescue lanes - Vessel Traffic Services (VTS) managed by the MCA - Commercial routes - Construction vessels and their proximity to existing asses (WTG locations, inter-array cables) - Combined effects of existing windfarm/oil and gas vessel activity and the additional construction vessel activity.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_071_012_020623	S42	Email	Navigational safety in the vicinity of West of Duddon Sands including Search and Rescue lanes	The Applicant notes your response.	No
Mon_071_013_020623	S42	Email	Vessel Traffic Services (VTS) managed by the MCA	This mitigation has not been adopted by the Applicant.	No
Mon_071_014_020623	S42	Email	Commercial routes	The Applicant notes your response.	No
Mon_071_015_020623	S42	Email	Construction vessels and their proximity to existing asses (WTG locations, inter-array cables)	The Applicant notes your response.	No
Mon_071_016_020623	S42	Email	Combined effects of existing windfarm/oil and gas vessel activity and the additional construction vessel activity.	The Applicant notes your response.	No
Mon_071_017_020623	S42	Email	This also applies to any survey and/or investigation work: it is therefore requested that proposed survey and outline construction programmes for the new project are shared with MWL and its shareholders and discussed as soon as possible	The Applicant notes your response. Information on proposed surveys and an outline construction programme was presented at a meeting between the Applicant, other proposed Round 4 wind farm projects in the Irish Sea and Orsted on 25th October 2023.	Yes
Mon_072_002_010623	S47	Email	Stena Line is submitting this response alongside its responses to the PEIRs for the Morgan Offshore Wind Project Generation Assets and Morecambe Offshore Windfarm Generation Assets. Given that the consultations have to a	The Applicant notes your comment of submitting your response alongside both a response to both Morgan and Morecambe's consultation	No





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			great extent been conducted jointly between the Mona, Morgan and Morecambe Projects (collectively, the "Wind Farms") and that Stena Line's main concerns apply equally to all PEIRs, there will be a level of duplication across Stena Line's responses. However, each response is Project specific and highlights Stena Line's concerns regarding the impact on Stena Line's operations arising from that Project.		
Mon_072_003_010623	S47	Email	Stena Line's main concern throughout the consultation period has been and still is the risks to navigational safety for its vessels, as well as other vessels operating in the array areas of the Wind Farms. The focus Stena Line's response has therefore been on the Shipping and Navigation Chapters of the PEIRs. Additional comments are made in respect of onshore impact arising from the cumulative effects of the Wind Farms.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_072_004_010623	S47	Email	Terms used(a) "COLREGs" means the IMO Collision Regulations as currently in force.(b) "Project Consortia" means collectively the Project Consortia for the Mona, Morgan and Morecambe Wind Farms, namely EnBW / BP and Cobra / Flotation Energy.(c)"MGN 654" means Marine Guidance Note 654.(d) "Mona" or the "Project" means the Mona Offshore Wind Project.(e)"NRA" means the Navigation Risk Assessment contained in Volume 6, Annex 12.1 of the Mona PEIR and prepared by EnBW / BP."PEIR" means Planning Environmental Information Report and generally refers to the PEIRs submitted by the Project Consortia in respect of the Mona, Morgan and Morecambe Wind Farms. (g)"Wind Farms" means collectively the Mona, Morgan and Morecambe Wind Farms proposed to be constructed in the Irish Sea.	The Applicant notes your response.	Yes
Mon_072_005_010623	S47	Email	INTRODUCTION: 2.1History of Stena Line Stena Line was founded in Gothenburg, Sweden in 1962. Stena Line is one of the world's largest ferry operators with over 26,000 yearly sailings on routes across Scandinavia and the Baltic, Irish and North Seas. Core values: Stena Line is a family-owned company and its core value is care; care for customers, care for resources and care for each other. Stena Line aims to offer affordable and seamless ferry transportation for all customers and has a commitment to safety, reliability and reducing its environmental footprint. In 2022 over 63 percent of trips ran according to the timetable and Stena Line aims to increase punctuality to a minimum of 67 percent, this will in turn result in lower CO2 emissions as the need to	The Applicant notes your response and thanks the consultee for sharing the information.	No
			accelerate and use additional fuel to catch up with scheduled arrival times will decrease. Employment: Stena Line employs over 5,900 employees from nearly 40 countries, with headquarters located in Gothenburg, Sweden. Stena Line's fleet contains 39 vessels which operate on 18 ferry routes between 10 countries, helping 7 million people reach their destination annually. In 2022		





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Mon_072_006_010623	S47	Email	In the UK, Stena Line's onshore operations employs around 745 people, and a further 1,193 people are employed onboard the vessels that operate on routes around the UK. Stena Line's Liverpool to Belfast and Heysham to Belfast routes are the key routes affected by the Mona / Morgan / Morecambe Projects and 400 people are employed across these routes. Stena Line's total employees across the Liverpool to Belfast route totals 313. In respect of onshore operations, 90 people are employed by Stena Line at the Birkenhead Port, with a further 72 employed at Belfast Port. In terms of onboard personnel operating the route, 81 people are employed to work onboard the Stena Edda, including57 international crew assigned to the vessel and 70 people are employed to work onboard the Stena Embla, including 58 international crew. In relation to the Heysham to Belfast route, a further 14 people are employed in onshore operations at Heysham Port. 39 people are employed to work onboard Stena Hibernia and another 39 are employed to work onboard Stena Scotia. Accordingly, Stena Line have a duty to protect the health, safety, welfare and job security of their considerable work force, which they take very seriously.	information.	No
Mon_072_007_010623	S47	Email	Infrastructure and vessel particulars The routes that Stena Line will address in this PEIR response operate from Liverpool, Heysham and Belfast. The Stena Line Liverpool terminal is located at 12 Quays Terminal in Birkenhead, the Stena Line Heysham terminal is located at the North Quay, Heysham and the Stena Line Belfast terminal is located at Victoria Terminal 2, Belfast. A number of vessels operate the routes between Liverpool and Belfast and Heysham and Belfast. Stena Edda, Stena Embla and Stena Foreteller sail between Liverpool and Belfast and Stena Hibernia and Stena Scotia sail between Heysham and Belfast.		No
Mon_072_008_010623	S47	Email	The passenger vessels operating between Liverpool and Belfast, Stena Edda and Stena Embla, are part of Stena Line's new E-Flexer class of vessel, which are optimised for efficiency and flexibility and are some of the most advanced and energy efficient vessels in operation. Stena Edda's particulars are: gross tonnage 40,500; year of build 2019. Stena Embla's particulars are: gross tonnage 40,500; year of build 2020. In terms of their capacity, each vessel can carry a maximum of 927 passengers, 120 vehicles and have a freight capacity of 3,100 lane metres. In terms of fuel consumption and costs, based on the current passage time of 8 hours, distance of the route of 142 nautical miles and fuel prices for March 2023, each trip for Stena Edda and Stena Embla averages overUS\$13,000. The Roll On Roll Off (Ro-Ro) Cargo Ship Stena Foreteller services Stena Line's freight operations on the route between Liverpool and Rolfagt. Stena		No
			Line's freight operations on the route between Liverpool and Belfast. Stena Foreteller's particulars are: gross tonnage 24688; year of build 2001. The freight capacity of Stena Foreteller is 3000 lane metres. Using the same passage information as above for the Liverpool and Belfast route, the total cost of each trip for Stena Foreteller is estimated to be around US\$10,710. Stena Hibernia and Stena Scotia are the Ro-Ro Cargo Ships transporting freight between Heysham and Belfast. Stena Hibernia's particulars are: gross tonnage 13,017; year of build 1996. Stena Scotia's particulars are: gross tonnage 13,000; year of build 1996. Freight capacity of the Stena Hibernia is 1,710 metres and the Stena Scotia is 1,692 metres. Based on a calculation of the current passage time of 8 hours, distance of 123 nautical miles and fuel		





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			prices for March 2023, thetotal cost per trip for Stena Hibernia and Stena Scotia is averaged at US\$6,555.		
Mon_072_010_010623	S47	Email	Fuel is one of the major operating costs for all merchant vessels, and the Stena Line vessels are no exception. This cost item has been brought into sharper focus in recentyears as fuel prices have rocketed over the past two decades (seeing only brief periods of decline linked to recession) and there has, understandably, been more attention on environmental protection. As elaborated on further below, even the slightest increase to a vessel's regular transit route can exponentially affect this operating expense annually. In Stena Line's case and for the PEIR under consideration, they have a total of 5 vessels potentially impacted.	The Applicant notes your response and thanks the consultee for sharing the information.	No
Mon_072_011_010623	S47	Email	Lifeline service Stena Line is the only ferry operator to operate a direct passenger and RoRo freight route between Liverpool and Belfast. In doing so, Stena Line ensures essential passenger and freight traffic can serve as a link between the respective locations and is able to contribute to the local community and bolster employment in the region. Were Stena Line's operations to be curtailed on this route, there would be no ferry route alternatives, in turn affecting both freight and passenger traffic. This would significantly impact the infrastructure, trading and employment at each location.	The Applicant notes your response and thanks the consultee for sharing the information.	No
Mon_072_012_010623	S47	Email	ROUTES: 3.1Liverpool and Belfast Stena Line operates 38 weekly sailings directly between Liverpool and Belfast on a twenty four hour schedule. The crossing time is approximately 8 hours. The Passenger Ro-Ros Stena Edda and Stena Embla operate the route along with the Freight Ro-Ro Stena Foreteller. The new E-Flexer class vessels Stena Edda and Stena Embla, which were introduced in 2021, include several emission-reducing technologies such as a streamlined hull, new propellers and two engines instead of four. As well as reducing emissions, the new ferries have also increased passenger and freight capacity on the route by a third.	The Applicant notes your response and thanks the consultee for sharing the information.	No
Mon_072_013_010623	S47	Email	Significant investment in Stena Line's Irish Sea operations reflect Stena Line's commitment to the region -Stena Line has recently signed a new deal with Peel Ports to operate their 12 Quays port and ferry terminal in Birkenhead for another 77 years until 2100. Stena Line has since made further investments to the region with a recent purchase of two sites next to the terminal which will offer additional storage for its freight customers as business is expanded there.	information.	No
Mon_072_014_010623	S47	Email	Heysham and Belfast The Stena Hibernia and Stena Scotia perform a dedicated freight service with 22 weekly crossings between Belfast and Heysham, the crossing time is approximately 8 hours.	The Applicant notes your response and thanks the consultee for sharing the information.	No
Mon_072_015_010623	S47	Email	Stena Line recently announced a multi-million pound investment to introduce another two freight ferries to the route in 2025, replacing the older vessels Stena Hibernia and Stena Scotia. The new vessels are set to increase freight capacity on the route by 80%, which will allow Stena Line to keep up with increased customer demand. In line with Stena Line's sustainability targets to reduce its CO2emissions by 30% by 2030, the NewMax vessels will be designed to run on methanol and will feature technology to operate onboth battery propulsion and shore power where available.1	The Applicant notes your response and thanks the consultee for sharing the information.	No
Mon_072_016_010623	S47	Email	INITIATIVES: Stena Line has been spearheading sustainable practice for many years. In 2015, Stena Line converted the Stena Germanica to run on both diesel and methanol, making it the world's first Roll-on Passenger	The Applicant notes your response and thanks the consultee for sharing the information.	No





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			(RoPax) vessel to do so.2Since then, Stena Line has developed the new E-Flexer class vessels and the NewMax vessels.		
Mon_072_017_010623	S47	Email	GREEN ENERGY: Stena Line supports the development of renewable energy in order to phase out reliance on fossil fuels and ensure the UK can align with the emission reduction targets set by the Paris Agreement. Our sister company, Stena Renewable Energy AB is a terrestrial windfarm developer in Sweden with over 201 wind turbines in operation and another 200 under design or construction spread across 14 windfarm sites. Stena very much promotes the generation of green energy and strives to ensure that the sites selected for their development are always carefully assessed for local impact. Stena Line has set a target to reduce CO2emissions from its vessels by 30% by 2030. At present, 100% renewable electricity is used in Stena Line's shore operation (by purchasing green credits for three of its ports) and about 20% of all Stena Line terminals offer shore power connections to Stena Line vessels. Stena Line is also investing in new green technologies including battery power, quayside power banks for charging electric ferries, alternative fuels (including methanol), utilising artificial intelligence in route planning and efficient ship designs.	The Applicant notes your response and thanks the consultee for sharing the information.	No
Mon_072_018_010623	S47	Email	The construction of the Wind Farms poses a concern to Stena Line's sustainability strategy insofar as Stena Line's vessels will be forced to deviate and take longer routes to safely transit around the Wind Farms' footprint. As noted above, this is in turn will increase fuel consumption and consequently greenhouse gas emissions. In addition, the impact on Stena Line's route operations may make it more difficult to ensure compliance with international and regional emissions regulations (including the IMO's Energy Efficiency Existing Ship Index and Carbon Intensity Indicator regulations and the EU Emissions Trading System). Accordingly, the Wind Farms' green energy credentials need to be assessed in the round, and according to the impact it will have on Stena Line's, and numerous other stakeholders', own sustainability strategies.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 12.1) and ES Chapter (volume 2, chapter 12) submitted as part of the Application.	Yes
Mon_072_019_010623	S47	Email	HISTORY OF THE PROPOSAL6.1Stena Line's perspective on history of proposals and involvement to date Stena Line has been partaking as a stakeholder since Q2of 2021 and have liaised with Nash Maritime who represent Project Consortia. Stena Line participated in Marine Navigation Engagement Forums (MNEFs) throughout 2022. After requests from Stena Line and other affected ferry operators (namely Isle of Man Steam Packet and Seatruck), Stena Line were also invited to carry out simulation exercises in August 2022. The Marine and Coastguard Agency also attended these simulation exercises.	The consultee has been part of the Marine Navigation Engagement Forums (MNEFs) and conversations will continue as the project moves forward.	No
Mon_072_020_010623	S47	Email	In October 2022, Stena Line attended a two-day HAZID Workshop in Liverpool aimed at assessing various hazards identified in the simulation exercises. In May 2023, further Navigation simulation exercises were carried out with Stena Line to assess the Project Consortia's proposed mitigations to the Navigation safety concerns identified at the previous simulations. These mitigations were in the form of a widening of the channels between the Windfarms and other offshore infrastructure. The joint HAZID Workshops resulting from this are still to take place to quantify their effectiveness. Due to this and the proximity in time between the simulations and the deadline for submitting the PEIR response, Stena Line's observations and comments	The Applicant notes your response.	Yes





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			regarding Navigational Safety are generally limited to the project boundaries as submitted in the PEIRs.		
Mon_072_021_010623	S47	Email	Stena Line's position is that although the forums and workshops have been helpful in identifying hazards and issues with the project footprint, two key issues should be noted from the PEIR and during the MNEFs to date: (1)The cumulative impact of Orsted's Isle of Man Offshore Wind Farm Project(the "Orsted Project"); (2)Some delay in circulating the agreed revised reduction of the Project footprint and widening of the navigation corridor.	The Applicant notes your response and would like to note that the Mooir Vannin Offshore Wind Farm is considered in Volume 6, Annex 7.2: Cumulative Regional Navigational Risk Assessment of the Environmental Statement.	Yes
Mon_072_023_010623	S47	Email	Stena Line understands from meetings with Orsted that they expect to submit their scoping report for the Isle of Man Offshore Wind Farm to the Isle of Man Government by Q4 2023.	The Mooir Vannin Offshore Wind Farm Scoping Report was published in October 2023. Accordingly, the Mooir Vannin Offshore Wind Farm is considered in the cumulative effects assessment as a Tier 2 project, where relevant.	No
Mon_072_024_010623	S47	Email	While technically still a Tier 3 project, Orsted have indicated their intentions to Stena line and have engaged with the Project Consortia on 20 October 2022. Despite this, to Stena Line's knowledge the Project Consortia have not considered the impact of the Isle of Man Offshore Wind Farm on ferry operations from a Navigation Risk Assessment perspective. Stena Line has specifically requested that the Project Consortia include the Orsted project in the latest Navigation simulations held in May 2023. Despite this the Orsted Project has still not been included and Stena Line must therefore regard the NRA process as being incomplete due to the failure to assess an adjacent transboundary development. Stena Line strongly requests that there be open dialogue and cooperation between the Project Consortia and Orsted both in attending MNEFs and navigational risk assessments to ensure the cumulative effect on Stena Line and other ferry operators of the proposed wind farm projects are properly considered.	The Applicant notes your response and would like to identify that the Mooir Vannin Offshore Wind Farm is considered in Volume 6, Annex 7.2: Cumulative Regional Navigational Risk Assessment of the Environmental Statement.	Yes
Mon_072_025_010623	S47	Email	Revised footprints of the Projects were agreed by the Project Consortia in January 2023. However the revised boundaries and navigation corridor are not assessed in the PEIR but listed as 'next steps'. No adequate explanation for this approach is provided. Stena Line strongly encourages the Project Consortia to adopt the revisions and proceed with further assessments on this basis.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the searoom around the Project to reduce the risk and impacts. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 12.1) and ES Chapter (volume 2, chapter 12) submitted as part of the Application, which demonstrated all risks have been reduced to As Low As Reasonably Practicable.	Yes
Mon_072_026_010623	S47	Email	Stena Line's Liverpool to Belfast route is significantly affected by the proposed footprint of the Wind Farms. Stena Line has throughout the consultation period highlighted and requested proper assessment of the impacts of the Wind Farms on ferry routes and in particular the need for a cumulative assessment. Stena Line's primary concern is that of safety and how its' affected vessels will be able to navigate the affected areas safely, especially in adverse weather conditions.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the searoom around the Project to reduce the risk and impacts. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 12.1) and ES Chapter (volume 2, chapter 12) submitted as part of the Application, which demonstrated all risks have been reduced to As Low As Reasonably Practicable.	Yes





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Mon_072_028_010623	S47	Email	CONSULTATION DOCUMENTS7.1Stena Line's perspective on the consultation documents The PEIR and in particular the NRA states that the assessment has been prepared in accordance with Marine Guidance Note 654 concerning safety of navigation and emergency response caused by Offshore Renewable Energy Installations (OREI) ("MGN 654"). MGN 654 which requires "stakeholder engagement to ensure that solutions are sought that allow offshore wind farms and navigation uses of the sea to successfully co-exist". On this basis, Stena Line's position is that navigational risk assessments and consultations should be carried out on the impact of all regularly used routes that traverse the Array Areas.	National Policy Statement EN-3 notes a distinction between "recognised sea lanes" and strategically important routes or lifeline ferry services. The NRA (volume 2, annex 7.1) and Shipping and Navigation Chapter (volume 2, chapter 7) assess all of these routes and therefore impacts to all operators have been considered within the shipping and navigation assessment.	Yes
			Stena Line notes that Chapter 12, section 12.8.2 of the Mona PEIR asserts that the only routes that are required to be assessed are "recognised sea lanes" within the meaning of UNCLOS Article 60, which, they say, is restricted to the defined traffic separation schemes. However, this interpretation contrasts with the National Policy Statement for Renewable Energy Infrastructure ("NPS EN-3"), which in section 3.8.346 clearly states that the Secretary of State will, when considering the Project site selection, consider particularly the need to avoid or minimise disruption or economic loss to shipping and navigation in "approaches to ports and to strategic routes essential to regional, national and international trade, lifeline ferriesand recreational users of the sea".		
Mon_072_029_010623	S47	Email	Clearly, the restrictive interpretation adopted in the PEIR is not conducive to finding solutions and not within the ambit of MGN 654. Accordingly, Stena Line firmly disagrees with the interpretation adopted in the PEIR. Stena Line (and the other affected ferry operators) operate on established routes which must be considered as recognised sea lanes. Stena Line therefore stresses that MGN 654 needs to be considered in full and that all affected commercial routes should form part of the navigational risk assessments.	National Policy Statement EN-3 notes a distinction between "recognised sea lanes" and strategically important routes or lifeline ferry services. The NRA (volume 2, annex 7.1) and Shipping and Navigation Chapter (volume 2, chapter 7) assess all of these routes and therefore impacts to all operators have been considered within the shipping and navigation assessment.	Yes
Mon_072_030_010623	S47	Email	Stena Line further stresses that the Project Consortia need to continue with the process of risk mitigation in collaboration with all stakeholders as is identified in the forthcoming second round Hazard ID Workshop to ensure that navigational risks to current operations are reduced to ALARP levels. It should be further stressedthat Stena Line will carry the risk once the Wind Farms are constructed and therefore Stena Line reserves the right to determine the level of risk which is acceptable. Stena Line appreciates that Ship Simulation exercises have been carried out but contends that while an exercise can be safely conducted in a simulator on a single transit that the exposure to risk is greatly increased by the frequency at which a vessel transits the area noting that Stena's vessels transited the area 2,997 times in 2019. Overthe 35-year life of the Project that is nearly 105,000 transits.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_072_033_010623	S47	Email	PROPOSAL FOOTPRINT: 8.1Deviation necessary (a)Chapter 12, section 12.8.3.5 of the Mona PEIR assesses the impact on Stena Line's routes as follows: "The Stena route between Liverpool and Belfast to the west of the Isle of Man	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42	Yes



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			with approximately 1,400 movements per year directly intersects the Mona Array Area. A revised passage plan was developed that passes to the east of the Mona Array Area, avoiding congestion within the TSS. Vessels would depart Liverpool as they currently do before heading more north northwest than at present, passing 1.5nm from the Hamilton North Gas Field and single buoy mooring, before turning to port 1.5nm from the northeast boundary of Mona in order to clear Chicken Rock on the Isle of Man at their existing waypoint. This would necessitate an additional 2.6nm/7.4 minutes of steaming time per trip." b) Considering Figure 12.5 of the Mona PEIR Chapter 12, it is clear Stena Line's routes are significantly affected by the Mona Array Area, in particular due to the routes required during adverse weather conditions. The PEIR estimates the deviation to be 2.6nm/7.4 minutes for the Liverpool-Belfast route per vessel per trip (See Mona PEIR, Chapter 12, section 12.8.3.5.). The deviationis significant for Stena Line's operations which rely on just in time arrival. Just as an example, an additional 2.6nm crossing distance for three vessels twice daily over the 35-year lifespan of the Project is almost 200,000nm in total (before any further deviation created by the Orsted project is taken into account). At current fuel prices, this additional mileage over the lifespan equates to US\$500,000 per annum, or a total of US\$17,300,000. On any view, this is a staggering addition to Stena Line's operating costs.	responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_072_034_010623	S47	Email	(c)The necessary deviation must also be considered alongside the need for adverse weather routeing (discussed below). The Navigation Risk Assessment published in the PEIR (NRA, section 1.8.3.20) concludes that, for ferry vessel routing, "in adverse weather, the reduced sea room and increased duration would necessitate additional operational constraints and potential cancellationsto these services" (see NRA, section 1.8.3.20). The cumulative impact of the necessary deviation that increases sailing time and adverse weather routeing therefore has a significant impact on Stena Line's operations far beyond the estimated 2.6nm/7.4 minutes per vessel per trip.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_072_035_010623	S47	Email	(d) Stena Line must consider the impact of the Wind Farms' footprint on its operations during the construction phase, the years of operation and during decommissioning. Stena Line expects the construction phase to be particularly disruptive to its voyages and the need to deviate will lead to delays. The Project Consortia have estimated constructiontime to be 4 years for Mona, 2.5 years for Morecambe and 4years for Morgan. Should the construction phase take longer than estimated, Stena Line needs to factor this into its planned operations. Further, it is not clear to Stena Line what the Marine Operating Guidelines will include in relation to risks and necessary deviation during construction of the Wind Farms. The adverse impacts on ferry routeing are highlighted in the Mona PEIR, Chapter 12, section 12.8.3.3: - "During construction, vessel traffic would be displaced from the Mona Array Areadue to the presence of construction buoyage and safety zones around fixed structures which are under construction"	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance	Yes





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			-"For regular runners such as ferries, this has the potential to result in a significant increase in costs or make schedules unviable. Furthermore, impacts on routeing may result in increased risks of collision or allisionIncreased transit distance necessitates an increase in fuel burn which has a direct additional cost to operators. Furthermore, this would increase the environmental impact of their operations through increased emissions." (See NRA, section 1.8.3.1)	at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_072_036_010623	S47	Email	"During construction, vessel traffic would be displaced from the Mona Array Areadue to the presence of construction buoyage and safety zones around fixed structures which are under construction"	The Applicant notes your response.	No
Mon_072_037_010623	S47	Email	"For regular runners such as ferries, this has the potential to result in a significant increase in costs or make schedules unviable. Furthermore, impacts on routeing may result in increased risks of collision or allisionIncreased transit distance necessitates an increase in fuel burn which has a direct additional cost to operators. Furthermore, this would increase the environmental impact of their operations through increased emissions." (See NRA, section 1.8.3.1)	The Applicant notes your response.	No
Mon_072_038_010623	S47	Email	(e)The footprint of the Mona Array Area and the consequential deviation that Stena Line's vessels will need to undertake causes serious concerns primarily for the safety of crew and passengers. Not only is the increased risk of collision or allision highly concerning (and discussed further below), but increased transit times may affect the crew's hours of rest and could risk contravening the Maritime Labour Convention's minimum hours of rest. The PEIR (at Chapter 12, section 1.8.3.1) acknowledges that "increased transit duration could make compliance with the convention impossible without compromising schedules or hiring additional crew." This in turn would have a further financial impact on Stena Line's operations.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_072_039_010623	S47	Email	(f) Another concern that Stena Line have is the potential environmental impact caused by increased emissions from the additional transit distance and resulting fuel consumption. This may also adversely affect Stena Line's ability to comply with regional and international maritime emissions regulations, including the IMO's CII regulations.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	





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Mon_072_040_010623	S47	Email	Navigational safety Overview(a) At the outset, Stena Line underlines and emphasises that the Navigational Risk Assessment (NRA) published in the PEIR (see NRA, section 1.9.8 and 1.11.3) concludes that Mona creates hazards with unacceptable risks to navigational safety and fail requirements in both NPS EN-3 2.6.165 and MGN 654 Annex 1.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_072_041_010623	S47	Email	(b) While risk control options are discussed, the PEIRs acknowledge that these are conceptual at this stage and have not been implemented. In any event, Stena Line does not agree that the conceptual risk controls are appropriate or likely to be effective. Notably, a number of the risk controls proposed would only mitigate the effects of an incident, rather than preventing it occurring in the first place. As such, they cannot properly be categorised as risk controls.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_072_042_010623	S47	Email	(c) Fundamentally, Stena Line, as a ferry operator in the region responsible for the safety of its crew and passengers, owing a duty of care to others and being responsible for stewardship of the environment, cannot accept the risks and failures to navigational safety set out in the NRAs and is concerned that proposed measures and risk control options will not be sufficient.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes





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Mon_072_043_010623	S47	Email	Data sets used and methodology(d)Stena Line acknowledges the NRAs that have already been conducted, including the Cumulative Regional Navigational Risk Assessment (CRNRA) undertaken collaboratively for the Mona, Morgan and Morecambe Offshore Wind Projects.	The Applicant notes your response.	Yes
Mon_072_044_010623	S47	Email	e)Stena Line's major concern throughout the consultation process has been that of navigational safety and Stena Line's primary obligations to ensure the safety of their employees, crew and passengers which may number up to 1000 persons on summer sailings along with the protection of the environment, which is the motivation for this concern.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_072_045_010623	S47	Email	(f) While Stena Line recognises the impact the COVID-19 pandemic may have had on recreational and commercial vessel movements, the omission of data sets from 2020-2022 means the PEIR relies on outdated information and importantly does not reflect the surge in ferry traffic post-pandemic. Stena Line therefore queries the assertion that "vessel traffic is expected to have largely returned to pre-pandemic levels" on the basis that traffic may well have increased beyond pre-pandemic levels (see Mona PEIR Chapter 12, section 12.4.1.2, Morecambe PEIR Chapter 14, section 14.100).In fact, Stena Line has obtained data contesting such findings, including port call figures for cruise ships that show an increase of calls to the Ports of Liverpool and Belfast in 2022 and projected for 2023.		Yes
Mon_072_046_010623	S47	Email	(g) The vessel density and number of vessels of different types that would cross the Project footprints is difficult to determine. This is acknowledged in section 12.4.4.18 of the Mona PEIR in relation to the density of smaller boats: "However, small boats operating inshore may not carry AIS and therefore the actual numbers could be underrepresented". From Stena Line's experience of operating in this region they agree that actual numbers are most likely significantly underrepresented.	The Applicant notes your response.	Yes
Mon_072_047_010623	S47	Email	(h) Further, the NRA acknowledges that passenger numbers are increasing (section 1.7.3.4) and that Ro-Ro freight is increasing generally (Figure 1.39). This is certainly Stena Line's experience, with passenger volumes growing year on year, complimented by the increased buoyancy in the economy of Ireland. As noted above, Stena Line are investing and responding to this by purchasing larger tonnage to increase their capacity.	The Applicant notes your response.	Yes
Mon_072_048_010623	S47	Email	(i) It is of concern that whilst adverse weather has been considered, this has been confined to wind, wave, and tidal conditions. No consideration appears to have been given to navigating in conditions of restricted visibility.	The effects of reduced visibility were explored during the navigation simulations, within which the ferry companies contributed. These are reported within the NRA (volume 6, annex 12.1) of the Environmental Statement.	Yes





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Mon_072_049_010623	S47	Email	(j)More generally, Stena Line are concerned that the Wind Farms have confined their analysis of historical data to the UK region. Given the global development of offshore wind farms, much of which pre-dates developments in and around the UK (particularly in the rest of Europe), Stena Line considers it would have been more appropriate to consider global (or, at least Europe wide) statistics.	Where available the updated NRA (volume 2, annex 7.1) has sought to use the latest and most extensive data possible.	Yes
Mon_072_050_010623	S47	Email	Assessment of incident risks (k) Crucially, the NRA (see NRA, section 1.9.6.5), concludes that the possibility of a collision between ferry/passenger vessels and another such vessel or a cargo/tanker vessel is a high risk and unacceptable hazard. Such risks directly impact Stena Line as a passenger ferry operator and cannot be accepted.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_072_051_010623	S47	Email	(I)The magnitude/likelihood of impact used in the Mona PEIR applies a very broad range between what is rated 'Medium' (reasonably probable that hazard may occur / 50%) and what is rated 'Low' (unlikely to impact Projects, but has occurred elsewhere / 10%). No other 'middle ground' ratings are contemplated between 'Medium' and 'Low' in the PEIR. Stena Line submits that using such a broad range for impact assessment criteria encourages selecting 'Low', given the absence of any other criteria to rate the risk between 10% and 50% and the high threshold of selecting 'Medium' at 50% hazard risk, such that the results are skewed in favour of a low impact result (see Mona PEIR Chapter 12, Table 12.12). The matrix used for the assessment of the significance of the effect also offers a generous risk tolerance compared to maritime industry standards and Stena Line therefore queries its appropriateness and whether it has been properly stress tested.		Yes
Mon_072_052_010623	S47	Email	(m)Further, sections 12.5.2.4 and 12.5.2.6 of the Mona PEIR stipulate that, 'final assessment' has been carried out by 'expert judgment'. It is not clear to Stena Line exactly what experts have been consulted and where the 'expert judgment' has been sought. Stena Line therefore requests full transparency and disclosure in this regard.	The Applicant has worked with NASH Maritime shipping and maritime consultants to undertake the shipping and navigation assessment, the assessment has been informed by stakeholder and master mariner input through navigation simulations and hazard workshops and broader stakeholder engagement throughout the preparation of the assessment via the Marine Navigation and Engagement Forum.	Yes
Mon_072_053_010623	S47	Email	(n)With regard to the review of historical incidents within the shipping and navigation study areas, Stena Line queries the relevance of analysing historical incidents in an area that will be subject to a significant and unprecedented construction project. While Stena Line acknowledges that the review of MAIB and RNLI databases appears thorough, the future risks of condensing vessel traffic to narrower navigation corridors will be a wholly separate consideration compared to any historical data obtained of previous incidents in an area with significantly less navigational constraints or concentrated traffic density.	Whilst it is recognised that the construction of an offshore wind farm would change the risk profile, an understanding of the underlying incident types and likelihoods provides an appreciation of what the starting point (baseline) of that increase is.	Yes





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Mon_072_054_010623	S47	Email	(o)Further, Stena Line highlights that two recent allisions have not been considered in the PEIR, namely the "ROCK PIPER" (September 2022 allision between vessel and gravity foundation of future wind farm Fécamp) and "PETRA L" (April 2023 deviation of vessel into Wind Farm array area). Further, the PEIRs have not listed and seemingly not assessed reported 'near miss' incidents. In Stena Line's own research, at least 10 'near miss' incidents were identified involving vessels in or near Wind Farms. While the investigation of 'near miss' incidents may not be as detailed, they are imperative for assessing the risk profile of the Wind Farms in terms of navigation safety.	These incidents had not occurred at the time of the drafting of the PEIR, and have been included within the updated NRA (volume 2, annex 7.1) and Shipping and Navigation Chapter (volume 2, chapter 7) of the Environmental Statement.	Yes
Mon_072_055_010623	S47	Email	(p)Overall, the conclusions of the PEIR on review of the historical incidents of vessels involving UK operational offshore Wind Farms is simplistic. Section 12.4.4.36 of the Mona PEIR concludes: "The accident return rates are generally low ,between 10 and 45 operational years between incidents, the majority accounted for by project vessels and have a low consequence, without loss of life or serious pollution. Therefore, over a typical 25-35 year operational duration it would be expected that a typical project would experience three allisions, two groundings and one collision or near miss. It is notable that there are no recorded accidents involving large commercial shipping vessels and offshore wind farms in the UK. Nor did any of the recorded navigational incidents across the UK sector result in loss of life."	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_072_056_010623	S47	Email	 (q)While Stena Line understands that review of historical incident data may be informative to a certain extent, it must be stressed that each Project and the associated risks will be particular and unique. Further, even one allision or collision in the navigation channels would seriously impact navigation of commercial vessels and ferry traffic, and in turn affecting Stena Line's operations. Further, the PEIR does not properly assess these risks, instead making statements such as: "Several routes, including the commercial routes through the Liverpool TSS and ferry routes from Heysham and Liverpool could pass within 1.5nm of the Mona Array Area and therefore this could impact the risk of collision. However, existing routes pass as close to other existing offshore wind farms such as West of Duddon Sands and Gwynty-Mor. Therefore, regular runners should be familiar with these effects." (See NRA, section 1.8.11.5) (r)Statements made in the PEIR like these are unhelpful and unwelcome and do not recognise the complexity of routeing, passage planning and operating a vessel, especially in dense traffic caused by offshore obstructions. 	process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the	Yes
Mon_072_057_010623	S47	Email	"Several routes, including the commercial routes through the Liverpool TSS and ferry routes from Heysham and Liverpool could pass within 1.5nm of the Mona Array Area and therefore this could impact the risk of collision. However, existing routes pass as close to other existing offshore wind farms such as West of Duddon Sands and Gwynt y-Mor. Therefore, regular runners should be familiar with these effects." (See NRA, section 1.8.11.5)	The Applicant notes your response.	No





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Mon_072_058_010623	S47	Email	(r)Statements made in the PEIR like these are unhelpful and unwelcome and do not recognise the complexity of routeing, passage planning and operating a vessel, especially in dense traffic caused by offshore obstructions.	The Applicant notes your response.	No
Mon_072_059_010623	S47	Email	(s)Stena Line are also concerned that the whilst the navigation simulations are undoubtedly useful, they are not a sufficiently realistic assessment of real-life conditions of navigation. For example, whilst it is noted that simulations involving the Mona array area did not result in any allisions (section 12.8.8.4 of the Mona PEIR, Chapter 12) Stena Line do not believe that this is necessarily indicative of the likely risk of allision. Similarly, reliance on statistics relating to current Irish sea windfarms should be treated with caution owing to the relatively small geographical area under consideration.	The purposes of the navigation simulations was not to conclusively demonstrate the likelihood that accidents were to occur, but rather identify whether there was suitable actions available to masters in certain vessel traffic or weather conditions to avoid an incident. It was recognised within the NRA that local incident statistics do not provide a full account of the types of accidents which could occur, hence why wider industry statistics have been referenced.	Yes
Mon_072_060_010623	S47	Email	(t)Stena Line's concern with the above conclusion is that certain incidents and/or navigational risks are accepted as inevitable and not properly analysed or mitigated for. While absolute certainty and safety are of course difficult, if not impossible, to achieve, it appears simplistic to accept and rely on historical incident data to the extent done by the Project Consortia. Stena Line encourages further navigational risk assessments and stakeholder engagement to ensure navigating the Wind Farms is as safe as possible.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_072_061_010623	S47	Email	Adverse weather routeing(u)The nature of Stena Line's operations and the design of their vessels make it more susceptible to disruption due to adverse weather. Stena Line's operations rely on both freight and passenger traffic, where safety (primarily) and comfort and enjoyment (secondarily) play an important role in the customer experience. It should be noted that the two E Flexer Class vessels are certified to carry up to 1,000 persons on board. It is therefore vital to the continued operation of Stena Line's routes that appropriate weather routeing is available that minimally impacts passenger experience and sailing time.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_072_062_010623	S47	Email	(v) The Project's footprint and the cumulative impact of the presence of such a volume of offshore windfarms effectively reduces the options available to our vessels' Masters to alter course to alleviate vessel motion. The consequence of our Masters no longer having a full range of routing and alteration options, may at the very least result in cancelled sailings. At worst, Masters may find themselves whilst on passage in a situation where excessive vessel motion cannot be mitigated by altering course and this in turn may potentially result in	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise	Yes





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			cargo shift or injuries to passengers and/or crew on board. It should be highlighted that the RoRo MV Riverdance suffered such a fate in January 2008 where her cargo shifted in adverse weather and the vessel grounded near Blackpool and was a declared a constructive total loss.	the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_072_063_010623	S47	Email	(w) As a general comment, whilst the Admiralty Sailing Direction stated guidance on wind, wave and tidal conditions (section 12.4.4.11 of Mona PEIR, Chapter 12) are acknowledged, it has been identified during stakeholder engagement relating to the Wind Farms that higher seas and stronger winds are experienced to the South East of the Isle of Man during the prevailing South Westerly winds.	Additional metocean modelling was conducted by HRWallingford to support the navigation simulations for the ES.	Yes
Mon_072_064_010623	S47	Email	(x) Section 12.8.4.4. of the Mona PEIR acknowledges the impact the Mona Array Area would have on vessel traffic: "During adverse weather, some sailings are delayed or inevitably cancelled irrespective of the presence of the Mona Array Area. However, with the presence of the Mona Array Area, sailings may be required to route a greater distance and duration. Over the course of a day, the aggregation of these delays would result in the potential for additional sailings to be cancelled where constraints such as hours of rest are exceeded. Such effects are already experienced by operators, but the presence of the MOWP may exacerbate this. "Whilst cancellations are indeed a concern and a 50% increase (as noted in section 12.8.4.7 of the PEIR, Chapter 12) is significant, Stena Line are also (more commonly) affected by departures being delayed for a more favourable weather window. In terms of navigational considerations, a delayed departure and associated weather routeing is also particularly challenging, as is the corresponding impact on hours of rest.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_072_065_010623	S47	Email	(y) The presence of the Wind Farms also risks cutting down adverse weather route options for Stena Line's mariners as they seek to safely transit. This includes the route to the east of the Isle of Man for the Belfast to Liverpool route. Section 12.10.4.14 of Mona PEIR Chapter 12 acknowledges that "the use of narrow corridors and frequent course changes may make [the east of Isle of Man route] unattractive." Stena Line submits that it is not merely 'unattractive' but due to the increased hazard of the proximity to wind turbines and the risks involved in sailing close to them in a restricted space that means the route (which is currently a weather safe route) will likely be removed as an option for Stena Line's vessels. This is unnecessarily restrictive to Stena Line's masters, who should be able to make a decision on whether to pass east or west of the Isle of Man based on the precise tidal conditions and corresponding seakeeping ability, the point being that either option should be available to them.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_072_066_010623	S47	Email	(z) Further, the PEIR estimates that the estimated cancellations for Stena Line's Liverpool to Belfast route may increase from 14 to 21 cancellations and	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations	Yes





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			for Stena Line's Heysham to Belfast route from 10 to 15 cancellations (see Mona PEIR, Chapter 12, section 12.10.4.7). The PEIR estimates that the Liverpool to Belfast route would see an "increase in transit times by 24 minutes, a total delay of at least 38 minutes relative to the typical route of 418-495 minutes" (see Mona PEIR, Chapter 12, section 12.8.4.14). For the Heysham to Belfast route, the PEIR estimates that the cumulative impact of the Wind Farms would in adverse weather increase delays by at least 119 minutes (see Mona PEIR, Chapter 12, Table 12.25).	around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_072_067_010623	S47	Email	(aa) The PEIR assesses the impact on adverse weather routeing to be 'Medium'. Considering Stena Line's current operations, a delay of this nature risks significantly impacting customer satisfaction. As previously stated, Stena Line as a ferry operator is also more susceptible to these type of disruptions.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_072_068_010623	S47	Email	Mitigation measures (bb) Table 12.16 of the Mona PEIR sets out a number of measures adopted that form part of the project design. However, it is not clear to Stena Line exactly how many of these measures will be adopted or enforced, beyond a commitment by the Project Consortia to implement the measures. Further, Stena Line requests further explanations on what mitigation or contingency plans are in place in the event some measures are not adopted or properly enforced during the Project lifetime.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_072_069_010623	S47	Email	(cc)Several proposed measures lack necessary detail. By way of example, it is unclear what 'poor conditions' for use of fog horns entail and how this	The requirements and details for risk control measures have been agreed with stakeholders through the NRA, and where appropriate, relevant conditions included as part of the draft DCO.	Yes





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			requirement will be operated in practice. Similarly, the use of guard vessels "as required" does not make clear when or how such a measure will be taken.		
Mon_072_070_010623	S47	Email	dd)Other proposed measures are unrealistic and, if adopted, risk falling foul of international regulations. Section 1.8.6.31 of the Mona PEIR Chapter 12 discusses how the geometries of offshore wind farms could reduce the visible appreciation of other vessels and claims "however, larger vessels would be identifiable from AIS and therefore passing arrangements could be agreed. "The suggestion that AIS should be relied on for collision avoidance is deeply concerning. This is especially so in light of Marine Guidance Note 324, which stresses that AIS information should be "treated with extreme caution and only used for enhancing situation awareness and not for collision avoidance decision making." (See MGN 324, section 4.10) Stena Line submits that such proposed overreliance on AIS as a collision avoidance tool could be in breach of COLREG 7(c).	The requirements and details for risk control measures have been agreed with stakeholders through the NRA, and where appropriate, relevant conditions included as part of the draft DCO.	Yes
Mon_072_071_010623	S47	Email	(ee) There is also a lack of detail on how measures will be enforced, for example in relation to Marine Operating Guidelines, vessel standards, PPE, training and vessel monitoring. Further, a statement that vessels should comply with international, UK and Flag State regulations cannot be classified as a mitigation measure. In any event, the proposed mitigation measures must be backed up by tangible and effective action points.	The requirements and details for risk control measures have been agreed with stakeholders through the NRA, and where appropriate, relevant conditions included as part of the draft DCO.	Yes
Mon_072_072_010623	S47	Email	(ff) Overall, while Stena Line recognises and supports the measures listed, its concern is how the measures will be achieved and regulated in practice so as to have any effect beyond being a statement of intent.	The requirements and details for risk control measures have been agreed with stakeholders through the NRA, and where appropriate, relevant conditions included as part of the draft DCO.	Yes
Mon_072_073_010623	S47	Email	Cumulative effects (gg) Generally, Stena Line is concerned with the PEIR's lack of consideration for how cumulative effects of several factors have not been considered when assessing navigational safety. For example, Table 1.27 of Mona PEIR, Chapter 12 (page 75) claims to show 'realistic traffic scenarios' in different areas with various vessels. Crucially however, the PEIR has not assessed the interactions between the different types of vessels (ferries, commercial, tug, fishing and recreational). Instead, they are assessed individually as to how each type may converge with vessels of the same type rather than how vessels of different types may converge. This therefore appears to present a highly theoretical scenario and the cumulative effects of different vessel types interacting has not been fully assessed. The PEIR's Cumulative Regional Navigation Risk Assessment confirms this by acknowledging that neither fishing and recreational vessels nor non-direct transits such as loitering or pilot boarding have been included in the analysis of concurrent frequency of two vessels meeting in the relevant areas (see NRA, section 1.8.6.3). This clearly shows that cumulative effects of different vessels have not been properly analysed.	The NRA presents the best available data and analysis collected through stakeholder engagement, consultation and data collection. The effects of interactions between small craft and large ships has been included within the NRA and qualitatively assessed by operators as part of the hazard workshop and navigation simulations. The developers of the Mona, Morgan and Morecambe Offshore Wind Projects have recognised the potential cumulative impacts on shipping and navigation to both commercial and safety receptors. As such, a Cumulative Regional NRA (CRNRA) was undertaken collaboratively by the three projects and was presented within the PEIR. Following the PEIR and S42 responses, all three projects have committed to modifications to their respective array area boundaries to increase searoom and minimise the potential cumulative impacts to shipping and navigation receptors. The effects associated with these boundary changes are presented in the updated NRA and appended CRNRA (volume 6, annex 7.1), and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_072_074_010623	S47	Email	(hh) Another concern is how the combined footprint of the Wind Farms will make traversing the corridors between them more difficult for Stena Line and other vessel operators. The Cumulative Regional Navigation Risk Assessment recognises that "vessels proceeding north to the east and west of the Mona Array Area would not have visual sight of one another until potentially within the constrained corridor"(see Morecambe PEIR, Appendix 14.2, section 8.7.4 and see also NRA section 1.8.6.31). This is a very real issue for any vessels transiting the area as there is a danger that vessels interpret the COLREGs differently based on their own visual sightings. While the PEIR makes reference to COLREGs, it is not acknowledged that COLREGs section II	The developers of the Mona, Morgan and Morecambe Offshore Wind Projects have recognised the potential cumulative impacts on shipping and navigation to both commercial and safety receptors. As such, a Cumulative Regional NRA (CRNRA) was undertaken collaboratively by the three projects and was presented within the PEIR. Following the PEIR and S42 responses, all three projects have committed to modifications to their respective array area boundaries to increase searoom and minimise the potential cumulative impacts to shipping and navigation receptors. The effects associated with these boundary changes are presented in the updated NRA and appended CRNRA (volume 6, annex 7.1), and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes





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			(Rules 11 to 18) only apply to vessels that are in sight of one another. The need for proper mitigation measures is therefore crucial to avoid collision risk.		
Mon_072_075_010623	S47	Email	(ii) The NRA at section 1.10.2.11 further notes in relation to the Mona to Morgan corridor that the width was insufficient for collision avoidance: "In particular, were two vessels to meet in the corridor a preferred 1nm CPA could not be maintained from the other vessel and the wind turbines."The combined footprint of the Wind Farms and how this would force vessel traffic into narrow navigation corridors is of serious concern to Stena Line, whose vessels transit the relevant areas regularly. Insufficient collision avoidance is unacceptable as Stena Line needs to look after the safety of its crew and passengers.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_072_076_010623	S47	Email	(jj) The cumulative effects of the Wind Farms would also exacerbate the impact of adverse weather routeing as vessels transit the designated corridors. The Navigation Simulation exercises revealed that adverse weather conditions would be uncomfortable and hazardous to passengers, likely leading ferries to take a more circuitous route around the Wind Farms rather than through the corridors. The NRA notes however that if weather conditions would worsen while a vessel was in the corridor, "there is little opportunity for the master to mitigate those conditions. Therefore, as excessive roll starts to be experienced, the master may for instance turn into wind, but in doing so will increase the riskof allision with the offshore wind farm" (see NRA, section 1.8.8.4). Such risks are highly concerning and not acceptable to Stena Line.		Yes
Mon_072_077_010623	S47	Email	Impact on the environment (a) Stena Line's vessels will be required to deviate around the Wind Farms, which will increase the transit distance (as discussed above) and in turn will increase fuel consumption.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are	





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				reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_072_078_010623	S47	Email	(b) Increased fuel consumption increases the vessels' greenhouse gas emissions and as such will have a detrimental environmental impact. Further, this may impact Stena Line's ability to comply with international and regional environmental emissions regulations as well as its ability to achieve Stena Line's own climate goals. The environmental impact for ferry operators is recognised in the PEIR (see NRA, section 1.8.3.1).	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_072_079_010623	S47	Email	(c)The IMO's Carbon Intensity Indicator (CII) regulation, which came into force in January 2023, are a set of mandatory measures implemented by the International Maritime Organization (IMO) to reduce greenhouse gas emissions from commercial ships as part of efforts to combat pollution and climate change. The CII Index of a vessel is used to determine how efficiently ships operate. Every vessel is required to have its CII rating calculated and independently verified. Vessels are given a CII rating of A, B, C, D,or E, with A being the best possible rating. A ship that is rated D for three consecutive years, or E in one year (e.g. those with the highest carbon intensity) will be required to submit a "corrective action plan" that outlines how the vessel will be brought to a minimum C rating. The most effective mitigations to improve the CII rating of a vessel is to reduce its speed on passage and improve its voyage planning. Clearly large new obstructions on passage such as windfarms will adversely affect a scheduled service where increased speed will be required to ensure timetabled services are met. If a ship or ship owner is non-compliant with the CII regulation, they may face financial penalties and increased costs for refinancing non-compliant ships, as well as a poor CII rating which could affect their business in the long term.	Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies	
Mon_072_080_010623	S47	Email	(d) In line with the regulations, Stena Line have calculated the operational CII for all its vessels that fall within the scope of the regulation. Based on data and calculations available at the time of this response, both Stena Edda and Stena Embla are estimated to fall into CII Band B. Stena Foreteller meanwhile is estimated to fall within Band E. Based on data and calculations available at the time of this response the Stena Hibernia is estimated to fall within CII Band B and Stena Scotia in Band D. Any increase in speed and/or fuel consumption required to navigate around the Windfarms is therefore a risk to Stena Line's vessels' ability to comply with the regulation.	transit distance, fuel costs, schedule disruptions, and more frequent	





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				reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_072_081_010623	S47	Email	Stena Line's ability to continue operating its routes (a) It is clear from the above analysis that a combination of factors, including (1) the deviation required by Stena Line's vessels during construction and operation of the Wind Farms, (2) adverse weather routeing, and (3) navigational risks will have a financial and operational impact on Stena Line. The consequences will include delays to voyages due to the longer routes required and increased fuel consumption. This is likely to have a knock-on effect on customer satisfaction and may ultimately make continued operation of Stena Line's routes unviable.	transit distance, fuel costs, schedule disruptions, and more frequent	Yes
Mon_072_082_010623	S47	Email	(b) Separately, the construction and footprint of the Wind Farms may potentially restrict or reduce the opportunities for Stena Line to develop new routes in the future where the Wind Farms increase travel distance and risk making any proposed routes less competitive to other methods of transport.	The Applicant notes your response.	Yes
Mon_072_085_010623	S47	Email	(b) Stena Line's view is that these comments extend beyond matters of aesthetics and character. Rather it is indicative that there is overcrowding of wind farms (including but not limited to Morgan, Mona and Morecambe) in navigable waters which (as discussed above) will impact Stena Line and other stakeholders in an adverse way (i.e., increased collision and allision risks).	The Applicant notes your response	Yes
Mon_072_086_010623	S47	Email	Radar(a)Stena Line has some concerns arising out of the PEIR Submissions made in respect to the effect of high densities of high Wind Turbine Generators ("WTGs") on Marine Radar. PIANC WG 161 ('Interaction between offshore wind farms and maritime navigation') written by the Maritime Navigation Commission of the World Association for Waterborne Transport Infrastructure identifies potential radar interference from navigating in proximity to high density windfarms. Stena Line has additionally accessed pictures showing the effect on the radar of the P&O ferry MV Norbay caused by multipath echoes caused by the North Hoyle windfarm off the North Wales coast.	It is noted within both the NRA and MGN654 that the effects on ship radars are most prevalent for vessels in close proximity to wind turbines and there is limited effect for those transiting at the distances at which ferries plan their passages. Furthermore, the wind turbines for the Mona Offshore Wind Project are further spaced apart than comparable existing projects in the Irish Sea and therefore it is anticipated that the effects will be significantly less. This is considered within the shipping and navigation chapter (volume 2, chapter 7) of the Environmental Statement.	Yes
Mon_072_087_010623	S47	Email	(b)Morecambe PEIR Chapter 16 at section 16.202 states: "Aviation lighting fitted to offshore WTGs could cause confusion to the maritime community as the specification for the lighting to be displayed below the horizontal plane of the light filament itself could cause mariners some confusion. This confusion could result in WTGs with conflicting warning lighting representing a collision risk to maritime surface vessels." (emphasis added)	Marking and lighting plan will be agreed with all relevant stakeholders	Yes
Mon_072_088_010623	S47	Email	(c)Firstly, it is noted that this observation was not made in the corresponding Mona or Morgan Offshore Generation Assets PEIR Submissions, which creates concern as to whether the Mona and Morgan Offshore Wind Farms have taken this problem into consideration (and are therefore taking steps to mitigate the risks involved).	Marking and lighting plan will be agreed with all relevant stakeholders	Yes
Mon_072_089_010623	S47	Email	(d) Secondly, Stena Line notes that any confusion as to the identity/purpose of a warning light poses a serious navigational risk to all marine traffic, including	Marking and lighting plan will be agreed with all relevant stakeholders.	Yes





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			Stena Line's vessels. It is paramount that a full consultation in respect of the use of lights on the WTGs is sought however, it is not clear as to who (if anyone) has been consulted on this point. More details are needed for Stena Line and the wider maritime community to provide input as to the safety of the new proposed aviation lighting. While it is acknowledged that the second round of Navigation Simulation exercises in May 2023 attempted to simulate the night-time visual effect of such an array of red warning lights, Stena Line notes that it would be unrealistic to expect any simulator to be able to provide a true visualisation of what this may look like in a real-world scenario.		
Mon_072_090_010623	S47	Email	(e) Thirdly, Stena Line expresses its concern that navigation lights on the wind turbines may risk interfering with vessels' ability to identify other navigation lights and impact their ability to manoeuvre safely. The difficulty posed by background lights when navigating vessels at night is recognised by COLREGs Rule 6(iv).	Marking and lighting plan will be agreed with all relevant stakeholders. On the basis of stakeholder feedback, night simulations were included within the 2023 navigation simulation sessions conducted with ferry companies and reported within the updated NRA (volume 6, annex 7.1) and shipping and navigation chapter (volume 2, chapter 7) of the Environmental Statement.	Yes
Mon_072_112_010623	S47	Email	MITIGATION10.1 Stena Line welcomes mitigation efforts to ensure the impact on its routes and operations are minimised. These include amendments to the Mona Array Area to maintain a 2nm offset in the approaches to the Liverpool Bay TSS and to reduce the northern extent of the Mona Array Area by approximately 3nm to increase the gap between the Mona and Morgan Array Areas (see Mona PEIR Chapter 12, section 12.14.1.2). While the Project developers have undertaken to carry out further navigation risk assessments applying these reduced boundaries of the Mona Array Area, Stena Line cannot at this time comment on this measure as it has not been considered in the PEIR and NRA. Given the findings of the NRA as to the unacceptable risk levels caused by the Wind Farms, Stena Line contends that reducing the array boundaries may be the only effective mitigation measure available. Stena Line will continue to fully engage with the consultation process but reserves its right to comment as to whether the proposed revised boundaries are sufficient to reduce the navigation risks to an acceptable level.	increase searoom and reduce the cumulative impacts on navigational safety.	Yes
Mon_072_113_010623	S47	Email	As noted in section 8.2 above however, the control risks and proposed mitigation measures to address the unacceptably high risks to navigation safety are not properly detailed and do not contain a proper plan for implementation. Stena Line urges the Project Consortia to consult all stakeholders and also consider the impact of the proposed Orsted Wind Farm when developing mitigation measures.	Consultation has continued with shipping and navigation interests through the Maritime Navigation Engagement Forum. This is discussed in Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement, Volume 6, Annex 7.1: Navigational Risk Assessment of the Environmental Statement and Volume 6, Annex 7.2: Cumulative Regional Navigational Risk Assessment of the Environmental Statement. Mitigation measures, and how they are secured, are detailed within the Mitigation and monitoring schedule.	Yes
Mon_072_114_010623	S47	Email	OTHER INTERESTED PARTIES 11.1 Alongside Stena Line, regional ferry operators that have been involved throughout the consultation period are Isle of Man Steam Packet, Seatruck Ferries and P&O. However, as recognised in the PEIR, Stena Line is the ferry operator most impacted by the footprint of the Wind Farms and will likely see its routes affected the most. Based on the forums attended by Stena Line's representatives, it is understood that these ferry operators share many of the same concerns as Stena Line. These include the navigational risk posed by the Wind Farms (in particular when considered cumulatively), the safety of passengers and crew, the impact on ferry routes (including delays and increased costs) and a consequent adverse impact on customer satisfaction (for example due to longer transit routes and more frequent cancellations). Stena Line also calls on the Project Consortia to	The NRA and Shipping and Navigation assessment have been developed through continued engagement with key stakeholder including all commercial ferry operators in the Irish Sea. There has been ongoing stakeholder and master mariner input through navigation simulations and hazard workshops and broader stakeholder engagement throughout the preparation of the assessment via the Marine Navigation and Engagement Forum.	Yes





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			prioritise the concerns raised by the UK Maritime and Coastguard Agency (MCA) and the UK Chamber of Shipping.		
Mon_072_116_010623	S47	Email	It is particularly noteworthy that many types of vessel traffic are expected to increase in the short to medium term in the region. Given the expected operational life of the Wind Farms is around 35 years, the risk assessments need to account for not just the current interested parties but whether these will increase over the years.	The NRA presents the projections for vessel traffic throughout the lifecycle of the Mona Offshore Wind Project.	Yes
Mon_072_117_010623	S47	Email	The Morecambe PEIR acknowledges that national port traffic is forecast to grow in the long term with unitised freight (including Ro-Ro vessels) "forecast to grow strongly, driven by economic growth" (see Morecambe PEIR Chapter 14, section 14.95). Further, the Port of Liverpool has invested in shoreside infrastructure to better handle larger vessels capable of carrying more cargo, demonstrating their particular growth intention.	The NRA presents the projections for vessel traffic throughout the lifecycle of the Mona Offshore Wind Project.	Yes
Mon_072_118_010623	S47	Email	CONCLUSION12.1Stena Line reiterates that it is not opposed in principle to the development and construction of the Wind Farms and recognises the consultations that have so far taken place. However, the PEIRs have not settled all concerns that Stena Line and other stakeholders have raised.	The Applicant notes your response.	Yes
Mon_072_119_010623	S47	Email	In particular, the Navigation Risk Assessment concludes that the construction as currently planned renders unacceptably high risk scores. This is especially alarming for Stena Line, as a high and unacceptable risk of collision between passenger / ferry vessels and other commercial vessels was found.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_072_120_010623	S47	Email	The mitigation measures identified have not been implemented and Stena Line notes that many lack detail or practical enforcement.	The requirements and details for risk control measures have been discussed with stakeholders through the development of the NRA. Mitigation and monitoring commitments are set out within the shipping and navigation chapter and the mitigation and monitoring schedule submitted as part of the Application.	Yes
Mon_072_121_010623	S47	Email	Stena Line provides a lifeline service to local communities and is fully committed to continuing to operate its routes. However, there is a real concern that the impact of the Wind Farms, as currently set out in the PEIR, on Stena Line's operations will make this difficult if not impossible.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom	





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				and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	,
Mon_072_122_010623	S47	Email	Analysis of the deviations required by the cumulative effect of the proposed development of the Morgan, Mona, Morecambe and Orsted Windfarmson Stena Lines Belfast to Liverpool services.	See Volume 6, Annex 7.2: Cumulative Regional Navigational Risk Assessment of the Environmental Statement.	Yes
Mon_072_123_010623	S47	Email	Passage North of the Isle of Man - IMAGE IN TEXT - This screen capture from the ECDIS of one of our EFlexer vessels showsthe deviations required for our Belfast to Liverpool route when routing North of the Isle of Man. The red hatched line shows the vessels current direct route.	The Applicant notes your response.	Yes
Mon_072_124_010623	S47	Email	Passage Southof the Isle of Man - IMAGE IN TEXT - This screen capture from the ECDIS of one of our EFlexer vessels shows the deviations required for our Belfast to Liverpool route when routing South of the Isle of Man. The red solid line shows the vessels current direct route.	The Applicant notes your response.	Yes
Mon_072_125_010623	S47	Email	Notes: •These passage plans are based on the reduced footprint for Morgan and Monaas proposed by the consortia.	The Applicant notes your response.	Yes
Mon_072_126_010623	S47	Email	Thefootprint for Morecambe however is plotted, as submitted in the PEIR, sincethe site location for the Morgan –Morecambe Transmission assets, booster station is still to be selected and therefore should the most North Westerly edge of the Morecambe Windfarm be chosenthen the benefit from the proposed reduced boundary would be negatedfrom a deviation perspective.	The Applicant notes your response.	Yes
Mon_072_127_010623	S47	Email	The Orsted Windfarm is also plotted as Stena Line have been reliably informed by the developer that this project will proceed andthatthe Scoping document will be submitted in Q4 –2023. As such this should therefore be regarded as an adjacent transboundary project.	Cumulative Regional Navigational Risk Assessment of the Environmental	Yes
Mon_072_128_010623	S47	Email	Bunker AnalysisThe following tables analyse the estimated additional bunker fuel consumption and cost for Stena Line vessels operating on scheduled services in the area. It does not factor in the additional cost in time on passage, maintenance due to additional running hours on engines, the cost of lubrication oil and sundries or the effect on vessels CII.	The Applicant notes your response.	Yes
Mon_072_129_010623	S47	Email	It uses the same thirty-five-year time frame as used by the consortia for calculating Navigational risk.	The Applicant notes your response.	Yes
Mon_072_130_010623	S47	Email	While the focus in the PEIR's is on the individual deviations around individual projects Stena Line must look at the cumulative impacts on its business over the life expectancy of the project.	The Applicant notes your response.	Yes
Mon_072_131_010623	S47	Email	In summary the cost to Stena Line in additional fuel alone over the thirty-five- year life expectancy of the project is c US\$ 10.3 Million.	The Applicant notes your response.	Yes
Mon_083_001_040623	S47	Email	Thank you for organising the presentations on the three windfarms you are looking to build in the Irish sea. I absolutely agree the need for renewable wind turbine electricity production. The positioning of your proposed farms on or near to the course of the IOM Steam Packet routes to Heysham and Liverpool will greatly add to the distance travelled.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise	Yes



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Mon_087_001_020623	S47	Email	This in turn will add cost to the fare and increase the time taken and importantly to the carbon footprint. In bad weather it could pose a maritime safety issue. Please note my vehement objection to all three fields. A final question if given the go ahead how would you propose to compensate the Isle of Man Steam Packet and its passengers? Yours sincerely To whom it may concern The below relates to all items under consultation. I am a resident of the Isle of Man and considering the proposed locations of the new Generation Assets, I hereby express great concern to the Isle of Man's lifeline represented by the ferry link from Douglas to the ports at Liverpool and Heysham. Any route which is not direct will add time and therefore cost to this journey. As a result, the cost of living on the Island will most certainly increase. Any additional costs to the transport of goods will result in an increase in the costs of goods and services on the Island. Travelling on holiday and for business will become more difficult, not only for residents, but also for potential visitors and prospective immigrants, making the Island a less attractive option. It is these last two groups which are vital for the long-term success and health of the Isle of Man - also according to the mid to long term strategy of the IOM Government. Professionals in all fields will be further put off from moving to the Island, thus adding further to the difficulty in attracting vital health professionals. All the above highlight the detrimental effects of the offshore wind project generation assets and offshore windfarm generation assets to the people of the Isle of Man. If you can give assurances that the shipping routes will not be affected, including both calm and rough weather routes, then I would be in favour of this development; if not, then I would be vehemently opposed to it. Thank you for your consideration. Kind regards,	the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application. The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_091_001_020623	S47	Consult Online	In response to the Consultation, Seatruck Ferries Ltd: Strongly objects to the development of the Morgan, Mona, and Morecambe Wind Farms and associated transmission assets for the following reasons:	The Applicant notes your response.	Yes
Mon_091_002_020623	S47	Consult Online	1. Safety of life and safe navigation: 1.1 The presence of the Morgan, Mona and Morecambe wind farms pose a severe risk to the safety of Company vessels, and hence the safety of those or board, in the event vessels become 'not under command' as defined by the International Regulations for Preventing Collisions at Sea.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked	Yes





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				together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_091_003_020623	S47	Consult Online	1.2 Company vessels will be hampered by the presence of wind turbines in complying with the International Regulations for Preventing Collisions at Sea, particularly for vessels bound to/from Heysham and Warrenpoint. In complying with the Regulations, vessels strive to keep their starboard sides clear to be able to react effectively to avoid close-quarters situations. The southern infringement of the Morgan Wind Farm and the northern infringement of Mona will hamper vessels in being able to meet this basic act of good seamanship.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_091_004_020623	S47	Consult Online	1.3 the Company is concerned that the cumulative presence of the Morgan, Mona and Morecambe Wind Farms will create traffic conflicts, previously not generally experienced.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_091_005_020623	S47	Consult Online	1.4 During summer months recreational vessels are encountered requiring the vessel to deviate from course in order to maintain safe navigation and allow sufficient sea room to pass. Fishing vessel can be encountered year-round and again requirements mean vessel to allow sufficient sea room to pass. Passing recreational and fishing vessels adds additional distance and time on to the sea passage.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to	Yes





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				amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_091_006_020623	S47	Consult Online	1.5 Response times to a marine casualty may be significantly increased due to wind farm location if a vessel is planning a route to the casualty as vessels may have to circumnavigate the wind farm to reach the casualty.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_091_007_020623	S47	Consult Online	1.6 Radar interference has been seen on radar equipment saturating the area of windfarm and therefore possible to obscure the location of small craft within the field. See below which is an example of interference on radar due to objects such as a wind farm. it has been seen that a vessel with poor radar reflective properties or lacking in AIS transmission is difficult to detect via radar equipment and therefore can be missed until within visual range and can be difficult to differentiate as above.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_091_008_020623	S47	Consult Online	1.7 All above points with the exception of 1.4 and 1.6 were proved to be to be the case when conducting simulations at HR Wallingford on 8th and 9th September 2022. Further simulations are planned for 22nd and 23rd June 2023.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety.	Yes





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				The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_091_009_020623	S47	Consult Online	1.8 This consultation period is ending before the second round of navigation simulations take place. The consultation period should be extended until all stakeholder ferry companies have completed their simulations taking place during June 2023 at HR Wallingford. Seatruck navigation simulations are scheduled for 22nd and 23rd June 2023.	Consultation has continued with shipping and navigation interests through the Maritime Navigation Engagement Forum. This is discussed in Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement, Volume 6, Annex 7.1: Navigational Risk Assessment of the Environmental Statement and Volume 6, Annex 7.2: Cumulative Regional Navigational Risk Assessment of the Environmental Statement.	Yes
Mon_091_010_020623	S47	Consult Online	2. The Crown Estate Award Process: 2.1 The planning and consultation in respect of the Morgan, Mona and Morecambe Wind Farms does not encompass the likely impacts and interrelations with other Irish Sea Potential Developments Areas such as those proposed off the Isle of Man and Irish coast. The Company feels that such an approach does not adequately serve the Consultation effectively.	The Applicant notes your response.	Yes
Mon_091_011_020623	S47	Consult Online	2.2 The Crown Estate should not have awarded leases for offshore wind farms without talking to ferry operators and other users of the marine environment first.	The Applicant notes your response.	Yes
Mon_091_012_020623	S47	Consult Online	2.3 If the Crown Estate had looked at AIS data would the Morgan, Mona and Morecambe sites have been awarded. We do not support the process of building wind farms in the middle of well-established and vital ferry routes.	The Applicant notes your response.	Yes
Mon_091_013_020623	S47	Consult Online	3. Commercial impact: 3.1 Company vessels will have restricted options to divert from the main passage plan due to stress of weather and therefore may not be able to achieve the Company's schedules. Consequently, voyages may be cancelled and the financial impact on the Company will be severe. The effect of such cancellations on customer confidence will be detrimental to the Company's future business prospects.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_091_014_020623	S47	Consult Online	3.2 Costs due to increased voyage distance – the infringement of the southern edge of the Morgan Farm will not allow Company vessel to follow the existing passage plan from Heysham and Warrenpoint and consequently voyage distances will increase. Such increased voyage distances will increase operating costs in terms of fuel and running hours and hence maintenance and servicing. Such extra operating costs will have a detrimental impact on the viability of operating a Heysham/Warrenpoint service.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the	





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				boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_091_015_020623	S47	Consult Online	3.3 Ferries operate to tight schedules and commercial viability is not covered. Normal port turn around alongside is within the tidal constraints of the port (Heysham) which is normally 4hrs on the berth. Normal activities are arrival on to berth including manoeuvring, the discharge of the vessel (approximately 2hrs of the total port time) over four decks of the vessel and the loading operations of the vessel (the approximate remaining port time 2hrs) over four decks of the vessel. Once cargo operations are completed then the departure of the vessel from port to seaward. Schedule is based on the hight of tide that is safest for the vessel to enter and leave with sufficient under keel clearance. If the vessel has been delayed due to weather conditions, then there is the possibility of a short port turn around to get the vessel sailing on a weather route to maintain a service if it is safe to do so, equally if the vessel is delayed on the berth for any reason during cargo operations sailing may be delayed till the next tidal window.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_091_016_020623	S47	Consult Online	3.4 Our Dublin route is time constrained due to recent terminal change which has had a significant impact on channel transit and the legal hours of rest for the crew.	The Applicant notes your response.	Yes
Mon_091_017_020623	S47	Consult Online	3.5 If there are any time increases that result in a loss of one or more sailing per day this could make the operation uneconomic.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_091_018_020623	S47	Consult Online	4. Environmental impact: 4.1 The burning of extra fuel to achieve the Company's schedule detracts from the Company's obligation to minimise environmental damage.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with	





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				the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_091_019_020623	S47	Consult Online	4.2 With the introduction of the Carbon Intensity Indicator (CII) regulations all ships are required to meet emission targets. Ships failing to meet the target may suffer a direct impact on charter decisions, values, financing, and insurance. Any increase of fuel burn will have a direct impact on the vessels CII.	The Applicant notes your response.	Yes
Mon_107_002_010623	S47	FREEPOST	I support the principle of building windfarm capacity to help counter climate change. However, I also consider that in designing specific new offshore Windfarms in the North Irish Sea, full account needs to be taken about their impact on existing shipping routes. One of the most important shipping operators in the North Irish Sea is the Isle of Man Steam Packet Company. The Isle of Man Steam Packet Company has been providing a passenger and freight service between the Isle of Man and ports around the Irish Sea for almost 200 years. The routes to Heysham, Fleetwood and Liverpool are particularly significant for passengers and for freight.	Impacts to ferry route are assessed in the NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop.	No
Mon_107_003_010623	S47	FREEPOST	It is no accident that a book in the nineteen seventies to mark 150 years of the Steam Packet Company was titled "Island Lifeline". For both passenger and freight services, the Steam Packet provides an essential service to the Island, residents and visitors. As your researchers may know, the Steam Packet has to have a range of options available for routing their sailings during challenging weather conditions. So ensuring the continuation of the lifeline service to the Island means that a variety of routes – depending on weather conditions – need to be protected. The detail of those existing necessary options will be for the Isle Of Man Steam Packet Company and the Isle of Man Government to define.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_107_004_010623	S47	FREEPOST	Even with a range of weather routes, climatic conditions will occasionally force the cancellations of sailings – for example storm force winds and – at the other end of the weather range – very poor visibility. Full account needs to be taken by the developers of the range of weather experienced in the North Irish Sea and the difficulties it presents for shipping. The objective of those planning the Morgan Windfarm development should be to ensure that the Windfarm development does not impose any further interruptions to shipping services than exist at present.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies	





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				and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_107_005_010623	S47	FREEPOST	In working towards that end, full account needs to be taken of the impact of the other two windfarm developments in the North Irish Sea – Mona and Morecambe. It is curious that the three adjacent developments are not being considered together – at least for their potential impact on shipping. In addition to not imposing any further interruptions to service, the proposed new Windfarms should not require the Steam Packet to have to deviate from existing shortest and most economical routes. If we are serious about tackling climate change, it would be nonsense to require existing shipping to use more fuel and incur more cost because of diversions caused by Windfarm development.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_107_006_010623	S47	FREEPOST	From a passenger perspective, research evidence shows that passengers require services which are reliable, punctual and affordable. It follows that any Windfarm development should avoid adding any cost, delay or reduced reliability on the Steam Packet Company's services. Passengers will expect the Windfarm developers to pay special attention to achieving the objective of not adding any cost, delay or reduced reliability to the existing sea services. Passengers are also likely to seek assurances that these objectives are agreed and that the public are kept up to date with progress on meeting these objectives by regular accessible public information.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_107_007_010623	S47	FREEPOST	From an Isle of Man resident's perspective, the current freight options are also crucial for supplying essential goods to the Island's retail and other outlets in a timely fashion. As a resident I seek an assurance that the development of Windfarms will not add cost or delay to our Island freight services and that the Steam Packet will be able to at least maintain existing reliability. Because the Island has a long established and well developed Tourist Industry, very many people from within the British Isles and from Europe use Steam Packet Services for major events such as the TT races. This peak of shipping activity is a vital component of the Island's economy and must not have additional costs, delays or increased reliability issues imposed on passengers because of the development of Windfarms.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are	





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				reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_107_008_010623	S47	FREEPOST	In developing plans for the Morgan Windfarm, I expect the Windfarm Developers to engage fully with the Isle of Man Steam Packet Company and the Isle of Man Government and to take full and proper account of any issues raised by those organisations. I also expect the developers to take full account of passenger representations from the wider travelling public based both on and off Island.	The NRA and Shipping and Navigation assessment have been developed through continued engagement with key stakeholder including all commercial ferry operators in the Irish Sea. There has been ongoing stakeholder and master mariner input through navigation simulations and hazard workshops and broader stakeholder engagement throughout the preparation of the assessment via the Marine Navigation and Engagement Forum.	Yes
Mon_107_009_010623	S47	FREEPOST	The importance of the shipping routes is further evidenced by the Isle of Man's Steam Packet's decision to invest in at least one large new ship – the "Manxman" will be the largest the Company has operated and is due in service shortly. Previous attempts to seek agreement for Windfarm developments some ten years ago caused considerable concern among the population of the Island and of other regular users of the Steam Packet. These attempts did not proceed in part through a failure to convince the travelling public that the shipping routes of the Steam Packet would be preserved. This note is primarily concerned with the services provided by the Isle of Man Steam Packet Company but the principles outlined in this note should apply to other established shipping interests.	normal and adverse weather conditions, ferries would necessitate deviations	Yes
Mon_107_010_010623	S47	FREEPOST	In summary, I expect the developers of the Morecambe Offshore Windfarm to fully respect the existing shipping routes of the Isle of Man Steam Packet Company and that any proposals for developing new Windfarms do not impose any additional costs, delays or increased reliability issues on the Steam Packet Company. I also expect the developers to provide regular updates on these issues that are easily publicly accessible so that the Manx Public are kept up to date with progress.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_109_002_250423	S47	Phone	The particular reason for the call on a point of detail, querying whether beyond 2026 the projects will all be constructed concurrently, or consecutively, and what this could mean for vessel movements in and out of the Port of Barrow. He understood when I referred him to the information on which we are consulting and said the documents provided were very helpful and that he would send us an email on more detailed points.	The Applicant notes your response.	No
Mon_109_003_250423	S47	Phone	He has already briefed REDACTED, Head of Offshore Wind for ABP (who I know was on the s47 notifications list for Morgan), and is planning to brief BAE Systems, and is keen that they provide feedback on any potential impact for	The Applicant notes your response.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received naval vessels (including nuclear submarines) passing in and out of the Port of	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_110_001_030523	S47	FREEPOST	Dear Sir The placing of Morgan, Morcambe and Mona wind farms will affect the IOMSPC routes in bad weather by not having enough 'sea room' to navigate through them. Will the IOMSPC or IOM Government be compensated for this, as well as the loss of fishing grounds. Also what effect will they have on sea birds in the area.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application. Impacts to sea brids are assessed in Volume 2, Chapter 5 Offshore	Yes
Mon_111_001_010623	S47	FREEPOST	a very good service is provided by the ferries and freighters between I.O.M and the U.K. In order to maintain this service shipping needs to be able to have a port diversion route in extreme weather conditions	Ornithology of the ES. The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_113_001_060623	S47	FREEPOST	I write as someone who is very much in favour of offshore wind power, and see obvious benefits in exploiting the Irish Sea for this purpose. However, I cannot stress too much the importance of maintaining a direct, navigable sea lane between Douglas and Heysham and Douglas and Liverpool. These two ports are effectively the Island's lifeline, carrying not only passengers but the essential freight that allows the Isle of Man to function. A diversion around a windfarm will add significant extra cost and environmental damage from fuel consumption, even with the latest ship in our fleet.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance	





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				at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_113_002_060623	S47	FREEPOST	If we were talking about an onshore development, I would argue that the Isle of Man - Liverpool route has been in continuous use by the Steam Packet since 1830 and that they would be able to claim a right of way over the route. Sadly, this principle does not seem to be enshrined in marine consenting. It is essential that the Isle of Man has access to a direct, navigable sea lane, with sufficient width to accommodate challenging wind, tide and fog conditions without undermining vessel safety.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_127_001_220423	S47	Feedback form	12.8.7.35 Identifies the potential for four collisions and 12.8.8.24 six allusions which is significant concern. The singular and cumulative effect of wind farms concentrates marine traffic exasperating these risks. Generous and substantial sea corridors must be created between Mona, Morgan, Morecambe, the existing wind farms and fossil fuel platforms. For Mona, the most Northerly boundary of the site should be reduced to minimise these risks and created a generous sea corridor. The IOM steam packet is adversely affected by Mona and should be compensated in poor weather routing scenarios. Passengers facing an additional hour at sea in poor weather deserve reimbursement as a result of this wind farm being created.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_132_002_030523	S47	Feedback form	This project further and even more severely impacts the lifeline ferry routes to the Isle of Man and other parts of the North Irish sea	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6,	Yes





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				annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_134_001_090523	S47	Feedback form	I am very concerned about the potential impact that these projects may have on shipping channels. It is my understanding that the projects could disrupt ferry travel between the UK and the Isle of Man, particularly during heavy weather, effectively isolating the Manx population.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_136_001_170523	S47	Feedback form	As an Isle of Man resident, I feel that our vital ferry routes to Heysham and Liverpool are not being taking into account. Our island risks being cut off from the outside work for days or even weeks in the winter, because the wind farms will reduce the routes available for the ferries in rough seas.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_136_002_170523	S47	Feedback form	The project would make it more difficult for the Isle of Man ferries to operate in rough seas.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6,	Yes





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Mon_136_005_170523	S47	Feedback form	The project would make it more difficult for the Isle of Man ferries to operate in rough seas.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6,	Yes





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				annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_186_005_180523	S47	Feedback form	I support the renewable generation of power using wind - in principle. However, as a resident of the Isle of Man, I am concerned about the potential impact on our lifeline routes to both Liverpool and Heysham. This proposed windfarm is in addition to existing windfarms in Morecambe bay and Liverpool bay. This is likely to increase journey time and fuel consumption. Also this windfarm may impact on the bad weather routing of our ferries, possibly causing cancellations and delays. This proposal appears to have no benefits for the Isle of Man but many possible adverse affects - delays, costs and increased carbon emission. Please consider these points when the location and boundaries are finalised.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_138_001_180523	S47	Feedback form	The proposed windfarms of Mona and Morgan will severely restrict the freedom of movement for both passengers and goods to and from the Isle of Man as both fields severely impede the shipping Routes for the Isle of Man Steam Packet and the Mezeron shipping company. Our Island is wholly dependent upon maintaining clear sea routes for the safe delivery of goods, food, medicines and critical supplies to the Island. The two proposed sites will endanger both the lives and livelihoods of the residents of the Isle of Man. The existing wind farms have already impacted the ability of the relevant shipping comapnies to safely navigate the centuries old sea routes during stormy or inclement sea conditions and these proposed routes further restrict or having reviewed the plans, actually close our shipping lifeline. I would go as far as to say that these proposed routes infringe upon the rights of the residents of the Isle of Man to travel freely without hinderence as covered under the EHCR, furthermore they will also infringe on the rights of the Islands residents to travel freely within the CTA. As such I wish to register my opposition to the proposed offshore windfarms of Morecambe, Mona and Morgan	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_138_002_180523	S47	Feedback form	I do not consider that you have fully considered or that you fully understand the restriction, hardships and difficulties that these proposed wind farms will create for the residents of the Isle of Man. You are clearly putting the lives of the crew and passengers of the Isle of Man Steam Packet and Mezeron shipping at risk and present a real threat to lives being rescued at sea in the event of an emergency.		Yes





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Mon_138_003_180523	S47	Feedback form	The proposed windfarms of Mona and Morgan will severely restrict the freedom of movement for both passengers and goods to and from the Isle of Man as both fields severely impede the shipping Routes for the Isle of Man Steam Packet and the Mezeron shipping company. Our Island is wholly dependent upon maintaining clear sea routes for the safe delivery of goods, food, medicines and critical supplies to the Island. The two proposed sites will endanger both the lives and livelihoods of the residents of the Isle of Man. The existing wind farms have already impacted the ability of the relevant shipping comapnies to safely navigate the centuries old sea routes during stormy or inclement sea conditions and these proposed routes further restrict or having reviewed the plans, actually close our shipping lifeline. As such I wish to register my opposition to the proposed offshore windfarms of Morecambe, Mona and Morgan	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_139_001_190523	S47	Feedback form	I am from the Isle of Man and this wind farm is going to have a terrible impact on our sea link to and from the UK. This must not go ahead, we often have rough seas and our ships have to take alternative routes across the Irish Sea due to the weather, this will prevent sailings from happening which is a major problem to our island for food, business and people. Build them somewhere else. Please!	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_140_001_190523	S47	Feedback form	This windfarm impacts on sailing routes in the Irish sea for the Isle of man steam packet. These routes are a vital lifeline between a British island and Britain and are even more important since brexit.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6,	Yes





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Mon_140_002_190523	S47	Feedback form	You need to interact with the Isle of man steam packet to adapt for its normal and bad weather sailing routes.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_140_003_190523	S47	Feedback form	Per 1 above, this is a critical issue as it impacts on a strategic Isle of man shipping route.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_141_001_190523	S47	Feedback form	Please do not block or inconvenience the ferry/shipping routes between the Isle of Man and the UK. They need a wide corridor so they have route options according to conditions.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6,	Yes





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				annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_141_002_190523	S47	Feedback form	Please do not block or inconvenience the ferry/shipping routes between the Isle of Man and the UK. They need a wide corridor so they have route options according to conditions.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
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Mon_141_004_190523	S47	Feedback form	Please do not block or inconvenience the ferry/shipping routes between the Isle of Man and the UK. They need a wide corridor so they have route options according to conditions.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6,	Yes





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				annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_142_001_230523	S47	Feedback form	Having listened to the webinar and read some of the documents based on the maritime review, has any analysis been completed on the impact of the time taken for the IOM steam Packet routes to Douglas on the standard route, together with the rough weather route and how different they are to the current sailing times?, and if so, could you point me in the right direction to review please.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_143_001_240523	S47	Feedback form	Please consider the cumulative effects of all Irish Sea wind farm projects on the Isle of Man,Äôs lifeline routes. The Morgan and Mona windfarms sit directly on the current sailing route for the Isle of Man Steam Packet Company's twice-daily return sailings between the Isle of Man and Heysham and the seasonal sailings between the Isle of Man and Liverpool. For this reason the projects should not be approved. My main concerns are: 1. The safety of navigation for ships when sailing through the wind farm corridors. 2. The lack of open sea room for navigating in rough weather is likely to increase risk of cancellations on the island,Äôs lifeline routes. This will affect passengers, hauliers and the wider population of the Isle of Man through delays and disruptions to shipments of essential goods. 3. The consequences of extra sailing distance imposed on lifeline routes, requiring more fuel, leading to increased fuel costs and greater CO2 emissions.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_143_002_240523	S47	Feedback form	Please consider the cumulative effects of all Irish Sea wind farm projects on the Isle of Man,Äôs lifeline routes. The windfarms sit directly on the current sailing route for the Isle of Man Steam Packet Company's twice-daily return sailings between the Isle of Man and Heysham, and the seasonal sailings between the Isle of Man and Liverpool. For this reason the projects should not be approved. My main concerns are: 1. The safety of navigation for ships when sailing through the wind farm corridors. 2. The lack of open sea room for navigating in rough weather is likely to increase risk of cancellations on the island,Äôs lifeline routes. This will affect passengers, hauliers and the wider population of the Isle of Man through delays and disruptions to shipments of essential goods. 3. The consequences of extra sailing distance imposed on lifeline routes,	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6,	Yes





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			requiring more fuel, leading to increased fuel costs and greater CO2 emissions.	annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_143_003_240523	S47	Feedback form	see above general comments for serious concerns about the impact on the Isle of Man's lifeline sailing routes	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_150_001_270523	S47	Feedback form	Concerns as to routes for Isle of Man Steam Packet routes through/around the wind farms, particularly for bad weather sailings. Also to ensure that no increase in sailing time is due to siting of wind farms due to vessels rerouting.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_151_001_270523	S47	Feedback form	This is part of a large project within the Irish Sea that has will produce good benefits for the UK but, as it stands, appears to offer no benefit to the Isle of Man and will adversely impact the island significantly due to disruption to shipping. The effects will be significant increased costs and reduced reliability with higher costs in the economy, disruption for residents and reduced tourism, with no benefit from the energy generated. Shipping to Northern Ireland may also be adversely impacted.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes





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				Potential impacts to tourism are assessed in Volume 4, Chapter 3 Socio-economics of the ES.	
Mon_151_004_270523	S47	Feedback form	Possible adverse impact from access restrictions.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_151_005_270523	S47	Feedback form	Disrupted shipping from restricted shipping lanes leading to higher costs and reduced reliability.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_152_001_280523	S47	Feedback form	Living in Douglas I do not think this project will bring any benefits and I would just like my objection noted. I think this will have a detrimental impact on the Isle of Man transport links and could cause gearing (sic) off island to be even more difficult by limiting the routes.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6,	Yes





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				annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_153_001_280523	S47	Feedback form	The placement of this wind farm has serious implications for the trade of the Isle of Man - the ferry is already one of the most expensive for freight and if the Mona and Morgan wind farms get the go ahead will devastate the trade to the Island. The whole purpose of green energy is to improve the planet not impact on a Countries ability to trade and destroy their trade route whilst increasing their amount of carbon utilization.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_153_003_280523	S47	Feedback form	Cause increased problems for the traffic to and from the Isle of Man and Ireland from the Heysham port.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_154_001_300523	S47	Feedback form	The safety of navigation for ships when sailing through the wind farm corridors. The lack of open sea room for navigating in rough weather is likely to increase risk of cancellations on the island, Äôs lifeline routes. This will affect passengers, hauliers and the wider population of the Isle of Man through delays and disruptions to shipments of essential goods. The consequences of extra sailing distance imposed on lifeline routes, requiring more fuel, leading to increased fuel costs and greater CO2 emissions.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6,	Yes





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				annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_154_002_300523	S47	Feedback form	The safety of navigation for ships when sailing through the wind farm corridors. The lack of open sea room for navigating in rough weather is likely to increase risk of cancellations on the island,Äôs lifeline routes. This will affect passengers, hauliers and the wider population of the Isle of Man through delays and disruptions to shipments of essential goods. The consequences of extra sailing distance imposed on lifeline routes, requiring more fuel, leading to increased fuel costs and greater CO2 emissions.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_154_003_300523	S47	Feedback form	The safety of navigation for ships when sailing through the wind farm corridors. The lack of open sea room for navigating in rough weather is likely to increase risk of cancellations on the island, Äôs lifeline routes. This will affect passengers, hauliers and the wider population of the Isle of Man through delays and disruptions to shipments of essential goods. The consequences of extra sailing distance imposed on lifeline routes, requiring more fuel, leading to increased fuel costs and greater CO2 emissions.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
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Mon_156_001_010623	S47	Feedback form	This project is damaging to Manx residents as it is on the ferry route from / to Heysham to/from Douglas. Behind the project is the Manx residents and their relatives in the UK, also our food line is at stake.	Application. The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_159_002_020623	S47	Feedback form	At no point should any of the Isle of Man ships going to and from the mainland be hindered, such as change of route or extra time taken to travel by ship, as it is such a vital lifeline, and also already expensive, to travel on and receiving supplies such as food as prices are already higher than UK and in case of fruit and veg a day older at least before we get them.	The NRA and Shipping and Navigation Chapter of the PEIR identified that	Yes
Mon_160_006_020623	S47	Feedback form	In winter the weather and the sea wins and shipping has to take the necessary action. And shipping does not need the added complication of having to think about wind farms in the middle of the sea. The existing Walney and north Wales coast wind farms do not impact shipping as these wind farms are in shallow waters where the ferries, cruise ship, oil tankers, et al do not go and cannot go as they will run aground. Here you are now trampling upon the sea faring space.	Impacts on shipping and navigation receptors have been assessed within Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement and discussed with the Marine Navigation Engagement Forum throughout the pre-application process.	No
Mon_160_007_020623	S47	Feedback form	So in the event of a shipping vs windfarm decision, the shipping should be the winner as shipping is the incumbent.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and	Yes





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				Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_160_008_020623	S47	Feedback form	Your arrogance is clearly demonstrated by para 12.8.3 where I quote "12.8.2.3 During consultation, several stakeholders asserted that historic routes between any two ports are necessarily recognised sea lanes, and therefore should not be impacted. A review of UNCLOS Article 22 determines that: 4. The coastal State shall clearly indicate such sea lanes and traffic separation schemes on charts to which due publicity shall be given. Therefore, the onus is on the MCA to put forward a proposed sea lane to IMO who would formally designate it. Given that this has not occurred, and no such routes are indicated on charts, Article 60 and NPS EN-3 2.6.161 would not apply. These principles were set out in legal advice concerning the Thanet Extension offshore wind farm and were reaffirmed by the Examining Authority in their Recommendation Report (Thanet Extension, 2019)."	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_160_009_020623	S47	Feedback form	If you were decent, honourable and reputable, you would be respecting the shipping stakeholders and not hiding behind a 'the route has not been registered' statement - what a disgusting and shameful approach which clearly indicates you do not care enough.	The Applicant has consulted extensively with the commercial shipping sector throughout the pre-application process through the Marine Navigation Engagement Forum, individual meetings, hazard workshops and written correspondence. The impacts on shipping and navigation have been assessed using industry guidance for assessing impacts of offshore wind farms. More detail can be found in Volume 2, Chapter 7 Shipping and Navigation of the ES.	No
Mon_160_010_020623	S47	Feedback form	How much do you value a life? And what if there was a large loss of life indirectly caused by one of your pylons impacting a ship in distress?	Impacts on shipping and navigation receptors, including Search and Rescue (SAR) operations, have been assessed within Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement and discussed with the Marine Navigation Engagement Forum throughout the pre-application process. The Applicant recognises the importance of the consultee's concern and recommends reviewing the identified impacts on shipping and navigation, including Search and Rescue operations, in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement.	
Mon_160_011_020623	S47	Feedback form	I sincerely hope you have consulted the RNLI and the Coastguard etc as to how they would effect rescue operations in the area. And please do not quote outside of certain harbour limits, etc. Everyone working in and on the Irish Sea treats it as one entity. And in the event of an incident you go to the aid of others as one day it could be you in the need of aid from others - a basic sea faring unwritten rule.	The Applicant confirms both the RNLI and Maritime and Coastguard Agency (MCA) were consulted on the Mona Offshore Wind Project under section 42 of the Planning Act.	No
Mon_160_012_020623	S47	Feedback form	Your arrogance and sea grab is further demonstrated by the solutions of - you can just go this way round - only adds a bit more. I notice there is zero statement about the increase fuel consumption for longer transits and thus CO2 emissions and the impact on the planet.	A full assessment of the impacts of the Mona Offshore Wind Project on climate change is presented in Volume 4, Chapter 2: Climate change of the Environmental Statement, including an assessment of the increased emissions from vessel diversions.	No





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Mon_160_013_020623	S47	Feedback form	On the last page, you describe committing to making some adjustments between Mona and Morgan and Morecambe. You should also trim the very north edge of the wind farm so as to remove any deviation from the SeaTruck routing out of Heysham.	Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. Edits to the Mona Array Area are outlined in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference: F1.4).	Yes
Mon_160_014_020623	S47	Feedback form	You should also consider trimming the north east corner where the IoMSP route from Liverpool to Douglas passes to avoid a rerouting - or maybe the better answer is to trim the north west edge of Morgan - remove the extra wide part - then there would be no deviation.	Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. Edits to the Mona Array Area are outlined in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference: F1.4).	Yes
Mon_160_015_020623	S47	Feedback form	Which leaves what to do with Stena from Liverpool routing round the south of the Isle of Man. Answer - split Mona in 2 with a suitable sea corrider (3km?) through on a WNW - ESE axis (or maybe NW - SE) to allow a continued normal Stena routing with an added advantage of possibly assisting the IoMSP bad weather routing.	Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. Edits to the Mona Array Area are outlined in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference: F1.4).	Yes
Mon_160_016_020623	S47	Feedback form	This proposal clearly shows that when it was dreamt up, there was no consideration given to existing sea farers - but then, this is not London so what does it matter. You have much work to do.	The proposals for the Mona Offshore Wind Project have been developed using a iterative design process with changes being made as more information from surveys and stakeholder engagement became available. Details of how the Mona Offshore Wind Project developed are included in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference: F1.4).	No
Mon_162_014_040623	S47	Feedback form	Shipping between Liverpool and Dublin already deals with offshore installations	The Applicant notes your response.	No
Mon_162_017_040623	S47	Feedback form	Sailing boats round Anglesey and going to IoM could present a problem, particularly at night and in rough weather	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_168_001_200423	S47	Consult Online	Absolutely all for wind power in the Irish Sea, but please make sure you don't impact the critical IOM Ferry routes and any sensitive coral or fish nursery areas on the seabed of the Irish Sea, of which there are many. It would be excellent to see offshore wind projects coupled with officially recognised marine park zones once they are constructed - seems like an easy	The Benthic subtidal and intertidal ecology technical report of the Environmental Statement includes the full baseline characterisation for the Mona Offshore Wind Project based on site-specific surveys undertaken in 2021 and 2022. No corals were recorded during these surveys. The Applicant is however committed to reducing impacts on sensitive benthic habitats and has adopted a number of measures as part of the Mona Offshore Wind Project to avoid such impacts (e.g. no cable protection in	Yes





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			win for you, and I imagine they are are areas where dredge fishing are restricted anyway.	Constable Bank). Further information can be found in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology. A detailed assessment is has been conducted to fully appraise the potential impacts to marine life, including fish and shellfish, and identify any mitigation measures or monitoring required to minimise any potential impacts. Further information can be found in Volume 2, Chapter 3: Fish and shellfish ecology. A full assessment of impacts to shipping and navigation can be found in Volume 2, Chapter 7: Shipping and navigation.	
Mon_169_001_200423	S47	Consult Online	It's very sneaky the way the map has been produced in the leaflets sent to all Isle of Man householdsnot sure of any other map of the Irish Sea which leaves out Liverpool. Heysham maybe, but Liverpool!? Please consider our ferry routes. It's hard enough to get off this rock without a wind farm in the way. I am absolutely in favour of renewable energy, and wind is something we certainly have a lot of, but by situating wind farms on the ferry routes between the IOM and Liverpool, you are adding an extra complication to life on the Isle of Man. I know we're not important to many on the mainland, and in the end whatever makes the most money will win out, but please at least consider the 86,000 people who live here and don't want to be stranded. (I know we have an airport, but that's a shambles too).	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application. The map on the consultation postcard that was distributed in the Isle of Man noted only the locations of public information events. This was explained on the postcard. The postcard included a QR code and web addresses pointing to where more detailed information could be found	Yes
Mon_170_001_200423	S47	Consult Online	This will make the Isle of Man boat routes unsafe. It must be moved	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_174_001_230423	S47	Consult Online	As a resident in the IOM, will this, or the other planned sites impact our existing shipping routes? If so what is the benefit to IOM residents.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked	Yes



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				together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_177_001_240423	S47	Consult Online	I have serious concerns about the effect of the wind farm on the shipping lanes. The Isle of Man relies on efficient shipping for 364 days a year for people /cars/goods /food etc. There needs to be sufficient leeway in the shipping lanes for alternative routes in bad weather to keep the risk of cancellation of sailings to a minimum both to Liverpool and Heysham.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_178_001_260423	S47	Consult Online	The map on the card that came through the door and also the map in the newspaper failed to show the key ports that provide the Isle of Man with its lifelines. Its less than honourable not to mark them and to mark the Steam Packet Company ferry routes. Are you hoping to ignore the elephant in the room? I am entirely positive about the concept of offshore wind farms. In this case, however, the Isle of Man stands to gain little direct benefit and yet its lifelines are threatened by the location of these fields. The Steam Packet Company estimates that 50 sailings a year may have to be cancelled. The Irish Sea is notoriously stormy and ships cannot run when there is danger of being blown into a Wind Farm. I therefore strongly object to this project and to the way it has been presented in printed literature sent to island residents and published n the papers. Missing Liverpool and Heysham off the maps shows less than full understanding that you are threatening our supply lifelines.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application. The map on the consultation postcard that was distributed in the Isle of Man noted only the locations of public information events. This was explained on the postcard. The postcard included a QR code and web addresses pointing to where more detailed information could be foun	
Mon_180_001_280423	S47	Consult Online	Well, nice you UK wants "green" energy. But gets the Isle of Man the energy? Main practical objections are the ferry connections. These will be in jeopardy. This will increase the costs of crossing permanently, so the inflation will rise even more for the Isle. Do we get compensation? Remember 70% of the food price is energy price.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to	Yes





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				reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_182_001_070523	S47	Consult Online	This entire project needs to be halted NOW. It will be disruptive to the ferry crossing that is vital to the Isle of Man	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_183_002_110523	S47	Consult Online	Access restrictions at Mostyn due to tidal range, limited vessel berthing, not suitable for multiple large vessels. Not much berthing for CTVs	Impacts on shipping are assessed in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement. Consultation has been carried out throughout the pre-application process via the Marine Navigation Engagement Forum.	No
Mon_183_003_110523	S47	Consult Online	Liverpool lock restrictions are prohibitive for daily vessel operations, entirely at the discretion of Liverpool harbour master, expect delays. Look for river berthing, possible pontoon at Cammel Lairds site may still be available.	Impacts on shipping are assessed in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement. Consultation has been carried out throughout the pre-application process via the Marine Navigation Engagement Forum.	No
Mon_183_005_110523	S47	Consult Online	High traffic area, TSS and multiple small vessels, project vessel routes, entry an exit points will need to be consulted with other local stakeholders to minimise downtime and delays.	Impacts on shipping are assessed in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement. Consultation has been carried out throughout the pre-application process via the Marine Navigation Engagement Forum.	No
Mon_183_006_110523	S47	Consult Online	Suitable port for large vessel operations, potential laydown area at the old orthios site close to port, approx 250 acres, but limited quayside access. Cammel Lairds may be a better option, but tidal and draft restrictions in the CL basin need to be planned carefully.	A single port or multiple ports in the northwest of England and/or north Wales could be used to support the Mona Offshore Wind Project. The final port(s) have not been chosen at the time of application.	No
Mon_185_001_290523	S47	Consult Online	The route to IOM is a lifeline route. My father worked for many years on ships as captain on the Irish Sea routes. It was his responsibility to decide in tough weather if a sailing should go ahead. I feel that safety will be severely affected by the wind farm. For this reason I object to the wind farm being positioned as your plans. Will your company guarantee that sailings will go ahead in all weathers???	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked	Yes





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				together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_191_001_210423	S47	Email	I live in the Isle of Man and am deeply concerned and opposed to your application to develop the Mona Offshore Wind Project if the stops the IOM boats (freight, food, provisions and passengers) travelling to and from the Isle of Man. We are an Island. It is our life line. Please do not shut us off!!!!	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_192_001_250423	S47	Email	We would like to state our concerns over the planned below project: MONA OFFSHORE WIND PROJECT If this site was to go ahead it could have a deep impact on the people and businesses on and off the Isle of Man. Much of the Islands trading involves travel to and from Liverpool and the Mona site would mean a change in the usual direct route. This would then mean that travel costs and travel time would also have to be raised. We are very much against the Mona site proposal. Thank you,	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_193_001_200923	S47	Email	I received a letter stating due to a technical error you could not capture my response to question 1.14 of my feedback. Unfortunately I did not take a copy of my answers and June is quite awhile ago now. To attempt to re-answer the question, I would say no development should be permitted that impacts current journey routes between Heysham and Liverpool to the Isle of Man, either in time it takes or extra costs by going a different/longer route due to windfarm expansion. The sea route is vital to the existence of transport on and off the Island, such as food, post and other goods. Travel times to places outside the UK are already longer than for	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to	Yes





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			people in the UK as an extra day is usually allowed either side of any holiday if travelling by boat to the UK, so I also wouldnt want this to be made worse. There has this summer been issues where the airport has been closing 5 times a day and I believe it is now 2 times a day, so that's not a reliable mode of transport, and if the shipping goes is made worse, how do we get good over or travel reliably. I also dont believe windfarms are product enough and arent worth the money invested into the infrastructure, and I believe only return 30% of cost. It may help the UK meet its renewable energy quota but the IOM is not part of the UK. The IOM is also an UNESCO biosphere. If the IOM has territorial rights for 12 miles off it shoes, the UK should have the same so a windfarm should be inside that and not block any shipping lanes. When the weather is poor especially in winter the boats have to take different routes so you just cant put a windfarm in location X hoping a boat doesnt need to go near it as in poor weather and depending upon wind direction it may need to when it wouldn't normally. We cant go 5 days without suppliers for example; about a year or two ago we went 4 days, it was bad.	increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_198_001_130923	S47	FREEPOST	My concern is the siting of the Morgan & Mona projects which would appear to significantly impact the vital sea route links to the Isle of Man. These are laid out in the Isle of Man Steam Packet's key concerns which I agree with. Key Concerns: The safety of navigation for ships when sailing thorugh the wind farm corridors; the lack of open sea room for naviating in rough weather is likely to increase risk of cancellations on the island's lifeline routes. This will affect passengers, hauliers and the wider population of the Isle of Man through delays and disruptions to shipments of essential goods; the consequences of extra sailing distance imposed on lifeline routes, requiring more fuel, leading to increased fuel costs and greater CO2 emissions.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_199_001_130923	S47	FREEPOST	I am a supporter of renewable energy and have no quibble with the building of wind farms in the Irish Sea. My concern is with the sitting of the Morgan & Mona projects which will significantly impact the future of our island. I attach a copy of the Isle of Man Steam Packet 'key concerns' which I endorse. Key Concerns: The safety of navigation for ships when sailing thorugh the wind farm corridors; the lack of open sea room for naviating in rough weather is likely to increase risk of cancellations on the island's lifeline routes. This will affect passengers, hauliers and the wider population of the Isle of Man through delays and disruptions to shipments of essential goods; the consequences of extra sailing distance imposed on lifeline routes, requiring more fuel, leading to increased fuel costs and greater CO2 emissions.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes

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Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_204_008_020623	S42	Email	Navigation and shipping The area of the proposed Mona Offshore Wind Project has significant amounts of existing shipping activity. The information provided in the PEIR is not clear on the extent to which and the location within which vessel activity would increase during both the construction and operational phases. Given there is no information currently available on vessel routes or proposed construction or O+M ports, it is difficult to understand the potential risks to assets associated with the generation and transmission of electricity from Barrow. It is noted that Mona Offshore Wind Project's Navigation Risk Assessment finds that "the impacts of the Mona Generation Assets would result in a hazard with an Unacceptable navigational risk score and therefore additional risk control options are required". We would appreciate if more information on this could be provided so we can properly understand and respond to the potential impacts and mitigations being proposed. It is important that any solutions properly take into account existing consent conditions and agreements. We would also appreciate being given the opportunity to input into and participate in discussions around navigational risks (including issues of search and rescue lanes and vessel traffic service) and mitigations.	Noted. Response received. The Barrow Offshore Wind farm is considered as part of the baseline in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement	Yes
Mon_207_008_020623	S42	Email	Navigation and shipping The area of the proposed Mona Offshore Wind Project has significant amounts of existing shipping activity. The information provided in the PEIR is not clear on the extent to which and the location within which vessel activity would increase during both the construction and operational phases. Given there is no information currently available on vessel routes or proposed construction or O+M ports, it is difficult to understand the potential risks to assets associated with the generation and transmission of electricity from Burbo Bank Extension. It is noted that Mona Offshore Wind Project's Navigation Risk Assessment finds that "the impacts of the Mona Generation Assets would result in a hazard with an Unacceptable navigational risk score and therefore additional risk control options are required". We would appreciate if more information on this could be provided so we can properly understand and respond to the potential impacts and mitigations being proposed. It is important that any solutions properly take into account existing consent conditions and agreements. We would also appreciate being given the opportunity to input into and participate in discussions around navigational risks (including issues of search and rescue lanes and vessel traffic service) and mitigations.	Noted. Response received. Burbo Extension is considered as part of the baseline in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement	Yes
Mon_207_009_020623	S42	Email	Physical interaction of projects It is very important that Burbo Bank Extension and its associated transmission assets can at all times be accessed to allow for appropriate Operation and Maintenance work and, in due course, upgrading, re-powering and decommissioning activities. It would therefore be useful to understand all of the Mona Offshore Wind Project components and routes associated with the proposed works (including proposed transmission works) so that we can establish that access for Burbo Bank Extension, including access for jack-up vessels and anchor splays (etc.), will be maintained and that physical interactions can be avoided, or understood and appropriately mitigated.	Noted. Response received. Burbo Extension is considered as part of the baseline in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement	Yes



D.25.14 Marine archaeology table of responses



Table D.25. 14: Marine archaeology table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_020_001_010523	S47	Email	I would like to access the Bathymetry surveys carried out for the Environment Impact Reports by Gardline and XOcean. I believe all surveys are meant to become available through the UKHO Marine Data Portal at some stage; could you either provide a link to them (hopefully in the BAGS file format) or give me an indication of when they may become available? I can confirm that the potential wreck referenced as Mona_0113 is an old wooden sailing ship, very broken up. A H102 report has been made to the UKHO so an	Volume 2, Annex 9.1: Marine archaeology technical report of the Environmental Statement has been updated to include this information and UKHO data will be reviewed for inclusion of UKHO record number should this be available for application. All relevant survey data will be uploaded to MEDIN and will be available in due course, and will be issued to the UKHO in due course.	No
Mon_049_001_310523	S42	Email	official UKHO reference number may be forthcoming in the future. Thank you for your email of 21stApril2023requesting our comments on the Preliminary Environmental Information Report (PEIR) for the proposed Mona Offshore Windfarm. We are aware that the PEIR supplied to us is informed by the Scoping Opinion you received from the Planning Inspectorate in June2022. We are also aware that this PEIR is produced in reference to the Infrastructure Planning (Environmental Impact Assessment)Regulations 2017 and the requirement on the developer to consult Historic England under Section 42 of the Planning Act 2008.	Response The Applicant notes your response.	No
Mon_049_002_310523	S42	Email	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	Information on Historic England's remit noted.	No
Mon_049_003_310523	S42	Email	We are aware that a small area of the proposed Mona Offshore Windfarm array area overlaps with the English North West Marine Planning Area (approximately 30km from the English Coast), as illustrated in the Indicative Extent of Marine Licences Sheet 1 and 2.Furthermore, in reference to Volume 2, Chapter 13(Marine archaeology), we acknowledge the position that the relevant regional Welsh archaeological trust should be consulted for historic environment records, as well as information resources held by Royal Commission on the Ancient and Historic Monuments in Wales(RCAHMW),as such resources could include this area of overlap	Consultation with Cadw and RCAHMW has been ongoing through the Archaeology and Heritage Engagement Forum. The marine archaeology assessment utilises National Monuments Record Wales (NMRW) data held by RCAHMW.	No
Mon_049_004_310523	S42	Email	For the proposed Mona Offshore Windfarm project, we appreciate the lead provided by RCAHMW and Cadw through the Archaeology and Heritage Engagement Forum (AHEF). We will therefore offer any advice as requested of us through the AHEF should any heritage assets be located within any area subject to English marine planning. For example, we note in Figure 13.2(Geophysical Anomalies within the Mona marine archaeology study area) that a couple of anomalies of "low potential" (Mona_0052 and Mona_0063) appear to be in the English marine planning area. Therefore, in reference to Table 13.13(Maximum Design Scenario), we request that further clarification is provided to us if these anomalies require further investigation and whether any mitigation strategy is appropriate.	Due to refinement of project boundaries, these two low potential geophysical anomalies are no longer within the Mona Array Area. Consideration of low potential anomalies are included in Volume 1, Chapter 3: Project description of the Environmental Statement and the Outline WSI and PAD appended to Volume 6, Annex 9.1: Marine archaeology technical report of the Environmental Statement. Full details of these are also in Volume 6, Annex 9.1: Marine Archaeology Technical Report of the Environmental Statement.	Yes
Mon_049_005_310523	S42	Email	Paragraph 13.4.4.30mentions that a potential wreck Linda Blanche (1915) was identified in the desktop study (UKHO record) but located outside of the Mona Array Area and within the English North West Marine Plan area; although not included in the geophysical survey area. We note that the recorded site of the	Due to the refinement of the Mona Offshore Wind Project boundaries, the wreck of Linda Blanche is located more than 100 m from the Mona marine archaeology study area and is therefore no longer considered in the Environmental Statement.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			wreck has been given an Archaeological Exclusion Zone, as a precautionary measure (as spatially identified in Table13.15). We have no further comment to offer at this stage.		
Mon_049_006_310523	S42	Email	Volume 6, Annex 13.1(Marine archaeology technical report) includes in Section 1.4 Marine archaeological assessment: submerged prehistoric archaeology as illustrated by Figure 1.2(Paleocoastlines within the Mona marine archaeology study area)and we defer to our colleagues at RCAHMW and Cadw as to the most appropriate methodology to be adopted for geoarchaeological modelling, as should be completed for the entire Mona Offshore Windfarm project area, including any area of overlap with the English marine planning area	The Geoarchaeological Ground Model for the Mona marine archaeology study area has been developed through first the site-specific geophysical data and developed further with the information obtained from the site-specific Geotechnical survey. The results of which have been discussed with Cadw and RCAHMS through the AHEF and were presented at PEIR.	Yes
Mon_069_321_010623	S42	Email	The potential direct impact on historical shipwrecks would also need to be assessed. MNH has recently acquired some shipwreck data and whilst this is still being evaluated and integrating it into MNH data system, it is already clear that there are several sites in the area albeit fewer than for the proposed Morgan Generation Assets windfarm. None of them are formally protected so as to cause a significant problem, but nevertheless MNH would expect an EIA to exercise due diligence in this respect. MNH suggest that given that their data also tails off in this direction because coverage only extends to the median line, so the developer would have to consult other sources in Wales and England for the Liverpool Bay area.		No
Mon_073_003_010623	S42	Email	Offshore The assessment of the Marine Archaeology has been carried out, so far, following appropriate surveys. The results of the geophysical surveys have identified 14 magnetic anomalies that are thought to represent archaeological sites and these will be protected by establishing Archaeological Exclusion Zones around them. This will prevent any direct impact on them during the project. The works has established the potential for elements of a submerged palaeolithic landscape being located in the area. Further work analysing bore hole data to provide information on this landscape will be carried out and will help to inform the design process for the wind farm. Prior to the commencement of the construction work a written scheme of investigation for the archaeological resource will be produced and instigated to ensure that any archaeological features encountered are appropriately investigated and the results reported	Response noted. The Applicant has submitted an outline offshore written scheme of investigation and protocol for archaeological discovery alongside the application for development consent.	Yes
Mon_073_004_010623	S42	Email	The measures outlined above to investigate and provisionally protect the maritime archaeological resource are appropriate at the stage of the design process.	Response noted.	Yes
Mon_073_015_010623	S42	Email	OFFSHORE Scheduled Monuments DE008 Pen-y-Corddyn Camp DE031 The Mount, Abergele DE114 Castell Cawr Hillfort Registered Parks and Gardens: PGW(Gd)58(CON) Gwrych Castle Registered Historic Landscape: HLW Gw) 5 Creuddyn and Conwy	Response noted.	No
Mon_210_001_240423	S42	Email	I have been reviewing a marine licence application for the MONA suction bucket trials today so have looked through Chapter 13 and related annex for the offshore archaeology as well. I've also noted that the inter-tidal survey seems to be free of archaeological remains, which will make everyone's lives easier.	The Applicant notes your response	No
Mon_210_002_240423	S42	Email	In terms of the offshore work, my main questions at this stage are really about the long-term monitoring of the Archaeological Exclusion Zones established in order to protect the identified historic assets on the seabed. Section 13.13 implies a	Measures adopted as part of the project include for the ongoing monitoring of all proposed AEZs, TAEZs and of the archaeological assets within them through the acquisition of survey data throughout the lifetime of the Mona	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			discussion of monitoring in its title. But the related tables all list monitoring of the historic assets within the scheme as N/A. There will almost certainly be a condition of the marine license that there needs to be some form of repeat surveys to monitor the condition/state/status of the historic assets within the AEZs, over the lifetime of the project and post-decommissioning.	Offshore Wind Project, where required. Further details are also included within the Outline Offshore WSI and PAD (Document Reference J18)	
Mon_210_003_240423	S42	Email	Related to this, we (RCAHMW and Cadw) are keen to ensure that it is possible to monitor historic asses contained within schemes such as Mona across the full life of the scheme and into its decommissioning phase. The only effective way to do this is to ensure that relevant spatial survey data relating to the historic assets within the scheme is archived with the National Monuments Record of Wales via the RCAHMW at the outset of the project, and as it is collected across its life. This will mean that if the responsibility for monitoring passes to another company, then access to the baseline data will be assured. This also relates to Policy Soc5 of the WNMP regarding opportunities to enhance our knowledge of historic assets. Essentially, what I am asking is that the spatial survey data within the AEZs is archived with the RCAHMW. I realise that the survey data itself can be commercially sensitive, so we are certainly not asking for the entire survey dataset, only those small portions that are directly related to the archaeological material.	Measures adopted as part of the project include for the ongoing monitoring of all proposed AEZs, TAEZs and of the archaeological assets within them through the acquisition of survey data throughout the lifetime of the Mona Offshore Wind Project, where required. Further details are also included within the Outline Offshore WSI and PAD (Document Reference J18)	Yes
Mon_210_004_240423	S42	Email	Finally, related to all of the above, it would be helpful if RCAHMW could be added to the list for sign-off of the AEZs, WSIs, PADs, etc along with Cadw, given that there are no maritime specialists in Cadw, and the RCAHMW is a the statutory consultee for the marine zone (inshore and offshore) of the WNMP.	The Outline Offshore WSI (Document Reference J18) incudes for RCAHMW to be consulted during sign off for AEZs, updates to the WSI and PAD. However, please note that final sign off rests with NRW.	Yes

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D.25.15 Other sea users table of responses



Table D.25. 15: Other Sea users table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_042_004_260523	S42	Email	Having reviewed the consultation documentation, including the Preliminary Environmental Information Report (PEIR), available at www.morganandmona.com, we are broadly content with the outline proposals put forward for MOWP and are confident that both schemes (MOWP and AyM OWF) can co-exist. We believe the approach taken by MOWL to minimise the overlap with the AyM OWF Development Consent Order (DCO) boundary is a positive approach, helping to ensure the two projects can co-exist with minimal interaction and, if consented, will both help to deliver clean, green, secure energy supplies to the UK energy system.	The Applicant notes your response.	No
Mon_042_005_260523	S42	Email	As both projects share the same grid connection point there will inevitably be a degree of physical interaction during the onshore construction phase of the projects. However, AyM OWF will work with MOWL throughout the process and seek to minimise the effects of interactions upon each project, whilst ensuring the projects can be delivered in an efficient manner.	The Applicant notes your response regarding potential overlap between the AyM OWF and the Mona Offshore Wind Project. The Applicant and AyM OWF have held a number of discussions and will continue to discuss how the projects can work together to reduce interactions and deliver both projects efficiently.	No
Mon_042_007_260523	S42	Email	Volume 2, Chapter 14 – Other Sea Users ·We note that Figure 14.4 of the PEIR makes reference to the AyM OWF project, however, we would like to bring to your attention that the entirety of the AyM OWF scheme is not represented on the current drawings. The polygon representing AyM OWF appears to relate solely to the array area and does not include the export cable route, nor the area to the west of the turbines where the meteorological mast is planned to be installed.	The application ES figure showing other offshore wind farms has been updated to show the cables/cable routes in addition to array areas.	No
Mon_042_008_260523	S42	Email	Volume 2, Chapter 14 - Any future figure should correctly represent the AyM OWF scheme, as per the other projects on the same figure. To this end, we have shared GIS files of the Works Plan areas with MOWL and would be happy to provide further information if necessary	Noted. Response received.	No
Mon_042_009_260523	S42	Email	Volume 2, Chapter 14 - Having reviewed the consultation information, we do not believe the MOWP PEIR red line boundary interacts with the AyM OWF DCO boundary in the offshore environment. We acknowledge that the construction programmes of both projects mean that similar activities may occur at the same time, however, we also believe potential interactions can be managed with continued dialogue and effective discussion between the parties and relevant consultees.	sensible way forward.	No
Mon_042_010_260523	S42	Email	Volume 1, Chapter 3 – Project Description · Figure 3.16 of the PEIR details the MOWP PEIR boundary and Onshore Development Area. This illustrates an overlap south of Glascoed Road, within the AyM OWF DCO boundary. We note that this is further refined in Figure 3.20 and that the area which coincides with the AyM OWF DCO boundary will be used for access only.	The Applicant notes your response regarding overlapping DCO boundaries. The Applicant and AyM OWF have held a number of discussions and will continue to discuss how the projects can work together in this area.	No
Mon_042_015_260523	S42	Email	Volume 1, Chapter 3 - In summary, Awel y Môr Offshore Wind Farm Limited is pleased that the proposed MOWP scheme has proactively sought to avoid interactions between the two projects and has kept overlap to a minimum. Whilst we have identified some areas worthy of additional review, we believe these to be minimal and that achievable solutions can be found with continuing constructive dialogue. We aim to continue working together to maintain the drive towards greening our energy supplies, building resilient supply chains and providing energy security to the UK market	The Applicant thanks AyM OWF for their response and agrees that continued engagement, on a range of issues, would be helpful to resolving any areas of concern and helping to deliver successful clean energy projects.	No
Mon_050_002_310523	S42	Email	The MCA's remit for offshore renewable energy development is to ensure that safety of navigation is preserved, as progress is made towards government targets for renewable energy. This response is focused on the shipping and navigation elements of the PEIR and will form the basis of our response to the Environmental Impact Assessment Report in due course.	The Applicant notes your response. Response received.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_050_010_310523	S42	Email	Safety Zones Safety zones during the construction, maintenance and decommissioning phases are supported, however it should be noted that operational safety zones may have a maximum 50m radius from the individual turbines. A detailed justification would be required for a 50m operational safety zone, with significant evidence from the construction phase in addition to the baseline NRA required supporting the case.	The Applicant notes your response. The Applicants intentions regarding safety zones are set out in the Safety Zone Statement (Document Reference J6) submitted alongside the application.	No
Mon_053_010_010623	S47	Email	There may be interfere with communications.	Noted. Offshore communications are addressed within Section 10.4.2 of Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	No
Mon_067_003_030623	S42/S44	Email	SPRWoDS recognises the importance of the proposed Mona Offshore Wind development, however it is imperative that the works do not compromise the operation of WoDS which is already delivering substantial renewable energy benefits and is contributing to meeting the national need for renewable energy identified and committed to by the UK Government.	Noted. Response received. The West of Duddon Sands Wind farm is considered as part of the baseline in Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	No
Mon_067_005_030623	S42/S44	Email	The ongoing and uninterrupted operation of WoDS is priority, it is therefore requested that proposed survey and outline construction programmes for the new project are shared with ScottishPower Renewables UK Limited (SPRUK) and discussed as soon as possible	The Applicant met with SPRUKL on the 8 November 2023 to discuss these matters.	No
Mon_067_006_030623	S42/S44	Email	•SPRUKL would like to request a meeting to understand the project(s) in greater detail and to discuss the potential impacts on: o Wake effects on existing developments and commercial compensation considerations	The Applicant met with SPRUKL on the 8 November 2023 to discuss these matters.	No
Mon_069_013_010623	S42	Email	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 pt 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 Array Area are discussed.	The licence block is shown on Figure 10.5 of Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	No
Mon_069_023_010623	S42	Email	Noting reference to the current UK-IoM interconnector; Has Manx Utilities been consulted over plans for a second electricity interconnector between UK and east coast Isle of Man? Likely within 10 years. See Figure 7.8. And then assessed as appropriate in subsequent analysis?	Consultation with Manx Utilities is ongoing with regard to this planned cable.	No
Mon_069_265_010623	S42	Email	Chapter 14 Other Sea Users. The TSC notes that the Agreement for Lease site in Isle of Man territorial waters is mentioned within this Chapter, included on the map, in Figure 14.4 and included in Table 14.6 which highlights the close proximity of the proposed Morgan Array Area to it, at 2.6kms. The TSC requests clarification as to why this was not included within the Shipping and Navigation Chapter, and as part of the Cumulative Impact Assessment as part of that Chapter?	The Mooir Vannin Offshore Wind Farm Scoping Report was published in October 2023. Accordingly, the Mooir Vannin Offshore Wind Farm is considered in the cumulative effects assessment as a Tier 2 project, where relevant.	No
Mon_069_266_010623	S42	Email	In addition, and in respect of the inclusion of oil and gas platforms, the TSC has in all of its correspondence to the Planning Inspectorate in relation to all the Round 4 offshore windfarm sites highlighted that there is a hydrocarbon licence in Manx waters. There is no mention of this site or licence within this Chapter, and the TSC seeks to ensure that consideration is given to this site also as part of this assessment. The TSC suggests the project team engages with the Licensee, Crogga Limited to understand their proposed work programme and consider how to ensure there are no detrimental impacts to that as part of this project.	The licence block is shown on Figure 10.5 of Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	No
Mon_069_267_010623	S42	Email	Manx Utilities. The TSC appreciates that there is mention, and inclusion of the Isle of Man interconnector between the Island and England as part of this chapter as it transects through the proposed Morgan array areas.	Noted. Response received.	No
Mon_069_268_010623	S42	Email	The comments and feedback outlined below have been drawn up following a review of the information made available to the Manx Electricity Authority for the purpose of	Noted. Response received.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			stakeholder consultation regarding project proposals relating to the above Wind Farm development.		
Mon_069_269_010623	S42	Email	The comments, views and feedback outlined in this document relate to those of the Manx Cable Company and Manx Electricity Authority, as stakeholders, considering the proximity of the proposed wind farms to our existing assets in the Eastern Irish Sea as well as significant stakeholders in the social-economic success of the Isle of Man.	Noted. Response received.	No
Mon_069_270_010623	S42	Email	Background Information: The Manx Cable Company (MCC) own and operates on behalf of the Manx Electricity 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 (65mi), 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.	Noted. Response received.	No
Mon_069_271_010623	S42	Email	Sub-sea cables are vulnerable to third-party damage from marine activities and these risks 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.	Noted. Response received.	No
Mon_069_272_010623	S42	Email	In addition to third-party damage the introduction of fixed structures and associated export, collector and/or array cables on or buried in the seabed, can through their proximity present an ongoing operational risk to maintenance and repair works over the life of the asset.	Noted. Response received.	No
Mon_069_273_010623	S42	Email	Considering the interconnector's asset value and strategic importance to our business and the wider Manx economy the MCC welcomed the opportunity to engage in the project consultation process regarding developments in the Eastern Irish Sea.	Noted. Response received.	No
Mon_069_274_010623	S42	Email	Interpretation of Wind Farm Proximity to the Interconnector: The wind farm is located to the south of the interconnector; no direct conflict.	Noted. Response received.	No
Mon_069_275_010623	S42	Email	The wind farm export cables will be positioned within the indicative cable corridor proposed, which runs from the southern boundary of the wind farm towards north coast of Wales; no direct impact.	Noted. Response received.	No
Mon_069_276_010623	S42	Email	Comments and Feedback: The comments and feedback, relate to concerns, which have been identified following an Impact/Risk Assessment regarding the potential increase in risk to the interconnector, through the construction and operational phases of the proposed Wind Farm.	Noted. Response received.	No
Mon_069_277_010623	S42	Email	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 developer ensures robust protocols are in place to highlight the existence and positioning of the interconnector to all vessel engaged in the supply chain.	Noted. Response received.	No
Mon_069_278_010623	S42	Email	2 - Third Party Damage - Displacement of fishing activity increases fishing interaction, from present levels, over the cable 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.	Noted. Response received.	No
Mon_069_279_010623	S42	Email	3 - Potential Design/Construction Conflict - Several options for future interconnection, via a second sub-sea interconnector cable, between IOM & UK are currently being considered with one potential off-shore cable route/corridor running to the north of the proposed Mona Windfarm and landing south of Blackpool Low - At present these plans and options are still in the high level feasibility stage but it is considered	Noted. Response received.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			appropriate to highlight and share our plans for information purposes at this time. As more information becomes available Manx Utilities will be able provide more information as appropriate.		
Mon_069_281_010623	S42	Email	Precise number, location and configuration of the wind turbine generators (WTGs), offshore substation platforms (OSPs) and any associated development.	Noted. Response received.	No
Mon_069_282_010623	S42	Email	Type of foundation to install the turbines and any associated development.	Noted. Response received.	No
Mon_069_283_010623	S42	Email	Exact height of the tip of the turbine rotors and the diameter of the rotors	This information can be found in Volume 1, Chapter 3: Project description of the Environmental Statement alongside all other Mona Offshore Wind Project parameters.	No
Mon_069_287_010623	S42	Email	We are committed to working collaboratively with all stakeholders to ensure that any development of offshore wind farms does not compromise the safety of air travel and welcome any opportunities for further engagement with the project teams.	Response received and noted.	No
Mon_071_007_020623	S42	Email	Proximity The Mona Offshore Wind Project array area is expected to be 31 km from West of Duddon Sands. The Mona Offshore Wind Project offshore cable corridor is expected to be 31.0 km away from West of Duddon Sands.	Noted. Response received and considered in Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	Yes
Mon_071_008_020623	S42	Email	Effect on energy yield of West of Duddon Sands and MWL's interests As set out, the proposed Mona Offshore Wind Project array is 31km from West of Duddon Sands. Due to this proximity, there is potential for the Mona Offshore Wind Project turbines to interfere with wind speed or wind direction of West of Duddon Sands and thus cause a reduction in energy output from the West of Duddon Sands turbines. This requires to be accurately assessed, appropriate mitigation applied with any remaining adverse effects appropriately compensated for the duration of MWL's consents and licences.	Noted. The West of Duddon Sands wind farm is considered as part of the baseline in Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	Yes
Mon_071_018_020623	S42	Email	Physical interaction of projects It is very important that West of Duddon Sands and its associated transmission assets can always be accessed to allow for appropriate Operation and Maintenance work and, in due course, upgrading, re-powering and decommissioning activities. It would therefore be useful to understand all of the Mona Offshore Wind Project components and routes associated with the proposed works (including proposed transmission works) so that we can establish that access for West of Duddon Sands, including access for jack-up vessels and anchor patterns (etc.), will be maintained and that physical interactions can be avoided, or understood and appropriately mitigated.	Noted. Response received. The West of Duddon Sands Offshore Wind farm is considered as part of the baseline in Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	Yes
Mon_071_021_020623	S42	Email	Emergency response We would be happy to discuss with you appropriate communication and collaboration between West of Duddon Sands, Mona Offshore Wind Project, and other nearby offshore wind developments in circumstances where emergency responses are required, for example in the event of accidents or pollution spills.	Noted. Response received.	Yes
Mon_071_024_020623	S42	Email	We would also welcome the opportunity to discuss further the following cumulative and in-combination impacts: Cumulative and in-combination effects – these are an area of concern due to the nature of the increased development in a congested area of sea, particularly in relation to shipping and navigation, ornithology, and marine mammals, as well as seabed morphology	The West of Duddon Sands offshore wind farm has been considered in the cumulative screening for each topic. The outcomes of topic specific cumulative screening are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement.	Yes
Mon_089_003_020623	S42	Email	Orsted has the benefit of an Agreement for Lease granted by the Isle of Man Government in 2015 and has conducted a number of environmental surveys and technical studies within the Isle of Mans Territorial Seas off the east coast to determine the feasibility of developing an offshore wind farm. These studies have	The Mooir Vannin Offshore Wind Farm Scoping Report was published in October 2023. Accordingly, the Mooir Vannin Offshore Wind Farm is considered in the cumulative effects assessment as a Tier 2 project, where relevant.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			determined the feasibility of the site. Orsted has progressed development and is currently working towards submitting a scoping report in September or October 2023, with an Application for Marine Infrastructure Consent currently anticipated to be made in Q1 2025.		
Mon_089_004_020623	S42	Email	Any interactions and impact should be considered long-term and the various project stages of construction, operation, maintenance and decommissioning of the Isle of Man Offshore Windfarm should be considered by you. It is important to ensure that all environmental impacts of your project are properly and fully assessed including any potential cumulative or in combination effects with the Isle of Man Offshore Windfarm. We refer you to our response to the Morgan Offshore Wind Project which outlines our concerns as to the approach taken to the in-combination and cumulative assessments to date. We would also expect consideration in your Report to Inform Appropriate Assessment.	The Mooir Vannin Offshore Wind Farm Scoping Report was published in October 2023. Accordingly, the Mooir Vannin Offshore Wind Farm is considered in the cumulative effects assessment as a Tier 2 project, where relevant.	No
Mon_090_001_020623	S47	Consult Online	We are writing on behalf of euNetworks Ltd. in our role as technical advisors and with responsibilities for operations and maintenance on their Rockabill telecoms cable system. We note that the Rockabill cable has been identified within the Mona study area but we have concerns about the potential impacts of the Mona project on the Rockabill cable and specifically with regard to the proximity of wind turbines and potential crossings by inter-array cables.	Noted. Response received. Consultation with euNetworks is ongoing with regard to the Rockabill cable.	Yes
Mon_090_002_020623	S47	Consult Online	Table 14.13: Maximum Design Scenario considered for the assessment of potential impacts on other sea users of the Preliminary Environmental Information Report refers 'Impacts to existing cables or pipelines or restrictions on access to cables or pipelines' as having the same Maximum Design Scenario as 'Displacement of recreational activities' which in turn includes the following parameters; ➤ Construction safety zones: 500m safety zones around wind turbines. ➤ Operational safety zones: 500m around infrastructure such as a wind turbine during periods of major maintenance.	Noted. Response received. Consultation with euNetworks is ongoing with regard to the Rockabill cable.	Yes
Mon_090_003_020623	S47	Consult Online	euNetworks are supportive of the definition of such safety zones around wind turbines. However, the final overall proximity limit to allow for access to the Rockabill cable must also consider and include the following; > Sea-room for typical cable repair activities such as grapneling; > Sea-room for manoeuvring of repair vessels; > Final bight laydown for the repaired cable sections; > Allowance for future cable repair access at or near repair bight areas.	Noted. Response received. Consultation with euNetworks is ongoing with regard to the Rockabill cable.	Yes
Mon_090_004_020623	S47	Consult Online	The Proximity Study for Submarine cables and offshore renewable energy installations undertaken by Red Penguin for the Crown Estate in 2012 provides a detailed discussion of the above points. Further to the above we note that ICPC Recommendation No. 13 on the Proximity of Offshore Renewable Wind Energy Installations and Submarine Cable Infrastructure in National Waters recommends dialogue on a risk-based determination of proximity limits with an indicative base case proximity limit of 750m recommended as a starting point for discussions. ICPC 13 also recommends a 500m working zone either side of existing submarine cables be provided for, which would indicate an overall proximity limit of 1,000m. However, our cable maintenance contractors have indicated that a minimum 1km either side of a cable line is recommended to allow for safe repair operations.	Noted. Response received. Consultation with euNetworks is ongoing with regard to the Rockabill cable.	Yes
Mon_090_005_020623	S47	Consult Online	On 10th May 2023 we received notification of geotechnical works planned within the Mona offshore wind farm array areas and the site investigations (SI) locations were provided. It is assumed that the sampling locations are potential locations for turbine foundations. The closest SI location is approximately 500m from the Rockabill cable	Noted. Response received. Consultation with euNetworks is ongoing with regard to the Rockabill cable.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			and there are a number of other SI locations less than 1km from Rockabill. This information indicates that the above discussed proximity requirements may not have been fully considered to date. We are eager to understand in more detail the plans for proximity of wind turbines to the Rockabill cable as well as any potential cable crossings over the Rockabill cable.		
Mon_186_001_310523	S47	Consult Online	I am concerned about the impact of all of this on the quality of sea bathing water - especially as Conwy have spent millions on the beach at Colwyn Bay. Please clarify through assessment.	The impacts of the Mona Offshore Wind Project on recreational bathing sites (including the beach at Colwyn Bay) due to increased Suspended Sediment Concentrations (SSC) and associated deposition are assessed fully within Volume 2, Chapter 10: Other Sea users of the Environmental Statement. For all phases (construction, operations and maintenance) of the Mona Offshore Wind Project this impact is assessed of being of minor adverse or lower significance, which is not significant in EIA terms.	No
Mon_198_001_130923	S47	FREEPOST	My concern is the siting of the Morgan & Mona projects which would appear to significantly impact the vital sea route links to the Isle of Man. These are laid out in the Isle of Man Steam Packet's key concerns which I agree with. Key Concerns: The safety of navigation for ships when sailing through the wind farm corridors; the lack of open sea room for navigating in rough weather is likely to increase risk of cancellations on the island's lifeline routes. This will affect passengers, hauliers and the wider population of the Isle of Man through delays and disruptions to shipments of essential goods; the consequences of extra sailing distance imposed on lifeline routes, requiring more fuel, leading to increased fuel costs and greater CO2 emissions.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_199_001_130923	S47	FREEPOST	I am a supporter of renewable energy and have no quibble with the building of wind farms in the Irish Sea. My concern is with the sitting of the Morgan & Mona projects which will significantly impact the future of our island. I attach a copy of the Isle of Man Steam Packet 'key concerns' which I endorse. Key Concerns: The safety of navigation for ships when sailing through the wind farm corridors; the lack of open sea room for navigating in rough weather is likely to increase risk of cancellations on the island's lifeline routes. This will affect passengers, hauliers and the wider population of the Isle of Man through delays and disruptions to shipments of essential goods; the consequences of extra sailing distance imposed on lifeline routes, requiring more fuel, leading to increased fuel costs and greater CO2 emissions.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and ES Chapter (volume 2, chapter 7) submitted as part of the Application.	
Mon_204_001_020623	S42	Email	We write on behalf of our client, Barrow Offshore Wind Limited, the operator of the Barrow Offshore Windfarm ("Barrow") in response to your notification of a proposed application for a development consent order ("DCO") under section 48 of the Planning Act 2008. We write to register with you our interest in your proposal and in particular areas of potential interaction between your proposed development and Barrow. Our response at this stage is based on documents currently made available regarding your project	Noted. Response received.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			and our response will likely develop as more information is made available including during application and examination stage and as we further consider the potential interaction between the projects. We are also engaging on the proposed Morgan and Morecambe wind farms and intend also to engage on the proposed Morgan and Morecambe Transmission Assets during statutory consultation.		
Mon_204_002_020623	S42	Email	Please can all responses to this representation be sent to REDACTED via the email address REDACTED.	Noted. Response received.	Yes
Mon_204_003_020623	S42	Email	Introduction: Interaction between Barrow and the Mona Offshore Wind Project Barrow Barrow is an operational offshore wind farm with combined capacity of 90 MW and 30 wind turbine generators. Barrow holds a lease from the Crown Estate and operates pursuant to the below consents. Barrow is expected to continue to operate, be maintained, and may in due course be upgraded and repowered, and will at some stage be decommissioned. Thus any interactions and impact should be considered to be long-term and the various project stages of operation/maintenance, re-powering and decommissioning should be taken into account by the Mona Offshore Wind Project. In addition, it is important that during the long-term interaction of the projects, the Barrow consents (including consent conditions) and any stakeholder agreements entered into by Barrow is not adversely affected.	Noted. Response received. The Barrow Offshore Wind farm is considered as part of the baseline in Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	Yes
Mon_204_004_020623	S42	Email	Consent No. N/A Consent Section 36 Consent Project Title Barrow Wind Farm Construction and Operation Status Operational Details Capacity of 90MW, 30 wind turbine	Noted. Response received.	Yes
Mon_204_005_020623	S42	Email	L/2016/00297 Marine Licence Operations and Maintenance activities Operational Removal of marine growth and/or guano, Replacement of corrosion protection anodes, Application of paint or other coatings, Modifications to J-tubes, Replacement of access ladders - major component replacement.	Noted. Response received.	Yes
Mon_204_006_020623	S42	Email	L/2014/00214 Marine Licence Cable repair Operational Repair of intra-array cables	Noted. Response received.	Yes
Mon_204_007_020623	S42	Email	Proximity The Mona Offshore Wind Project array area is expected to be 42.9km away from Barrow. The Mona Offshore Wind Project offshore cable corridor is expected to be 53.9km away from Barrow. Effect on energy yield of Barrow As set out, the proposed Mona Offshore Wind Project array is 42.9km away from Barrow. Due to this proximity, there is the potential for the Mona Offshore Wind Project turbines to interfere with wind speed or wind direction of Barrow and thus cause a reduction in energy output from the Barrow turbines. This requires to be properly assessed, appropriate mitigation applied with any remaining adverse effects appropriately compensated.	Noted. Response received and considered in Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_204_008_020623	S42	Email	Navigation and shipping The area of the proposed Mona Offshore Wind Project has significant amounts of existing shipping activity. The information provided in the PEIR is not clear on the extent to which and the location within which vessel activity would increase during both the construction and operational phases. Given there is no information currently available on vessel routes or proposed construction or O+M ports, it is difficult to understand the potential risks to assets associated with the generation and transmission of electricity from Barrow. It is noted that Mona Offshore Wind Project's Navigation Risk Assessment finds that "the impacts of the Mona Generation Assets would result in a hazard with an Unacceptable navigational risk score and therefore additional risk control options are required". We would appreciate if more information on this could be provided so we can properly understand and respond to the potential impacts and mitigations being proposed. It is important that any solutions properly take into account existing consent conditions and agreements. We would also appreciate being given the opportunity to input into and participate in discussions around navigational risks (including issues of search and rescue lanes and vessel traffic service) and mitigations.		Yes
Mon_204_009_020623	S42	Email	Physical interaction of projects It is very important that Barrow and its associated transmission assets can at all times be accessed to allow for appropriate Operation and Maintenance work and, in due course, upgrading, re-powering and decommissioning activities. It would therefore be useful to understand all of the Mona Offshore Wind Project components and routes associated with the proposed works (including proposed transmission works) so that we can establish that access for Barrow, including access for jack-up vessels and anchor splays (etc.), will be maintained and that physical interactions can be avoided, or understood and appropriately mitigated.	Noted. Response received. The Barrow Offshore Wind farm is considered as part of the baseline in Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	Yes
Mon_204_010_020623	S42	Email	Helicopter activity It is difficult to quantify the level of impact helicopter usage during the construction and operation of the Mona Offshore Wind Project. It is noted that the PEIR highlights that there may be 2 helicopter supports completing 365 return trips during installation works. No heliport site(s) or transit route(s) have been identified within the PEIR documentation. We would appreciate if more information on this could be provided so we can properly understand and respond to the potential impacts and mitigations being proposed.	Noted. Helicopter operations will be conducted in Class G (uncontrolled airspace) in Visual Meteorological Conditions (VMC) under normal Rules of the Air and the 'See and Avoid' principle. Daily construction, operation & maintenance helicopter movements, conducted below 5,000 ft above mean sea level (amsl), are likely insignificant compared to current Irish Sea Class G aviation activity. Heliport site(s) yet to be confirmed; further information can be provided in regard to helicopter support operations when he mode of operation has been decided.	Yes
Mon_204_011_020623	S42	Email	Emergency response We would be happy to discuss with you appropriate communication and collaboration between Barrow, Mona Offshore Wind Project, and other nearby offshore wind developments in circumstances where emergency responses are required, for example in the event of accidents or pollution spills. Cumulative and in-combination effects of projects It is important to ensure that all environmental impacts of your project are properly and fully assessed including any potential cumulative or in combination effects with Barrow. As an example, the impact upon Whooper Swan has been the subject of studies in relation to Barrow and these studies have shown Whooper Swan transits through or close to your proposed development. Whooper Swan have so far been omitted in your offshore ornithology chapter. We would be happy to discuss with you the Whooper Swan studies, and your approach to potential cumulative or in combination effects generally, in order to help ensure a compliant assessment.	The Barrow offshore wind farm has been considered in the cumulative screening for each topic. The outcomes of topic specific cumulative screening are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement. Project alone and cumulative collision assessment of Whopper swan are included in Volume 2, chapter 5: Offshore ornithology of the Environmental Statement.	Yes
Mon_205_001_020623	S42	Email	We write on behalf of our client, Ørsted Burbo (UK) Limited, the operator of the Burbo Bank Wind Farm ("Burbo Bank") in response to your notification of a proposed	Noted. Response received.	Yes





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			application for a development consent order ("DCO") under section 48 of the Planning Act 2008. We write to register with you our interest in your proposal and in particular areas of potential interaction between your proposed development and Burbo Bank. Our response at this stage is based on documents currently made available regarding your project and our response will likely develop as more information is made available including during application and examination stage and as we further consider the potential interaction between the projects. We are also engaging on the proposed Morgan and Morecambe wind farms and intend also to engage on the proposed Morgan and Morecambe Transmission Assets during statutory consultation. Please can all responses to this representation be sent to REDACTED via the email address REDACTED.		
Mon_205_002_020623	S42	Email	Burbo Bank Burbo Bank is an operational offshore wind farm with capacity of 90 MW and 25 wind turbine generators. Burbo Bank holds a lease from the Crown Estate and operates pursuant to the below consents. Burbo Bank is expected to continue to operate, be maintained, and may in due course be upgraded and repowered, and will at some stage be decommissioned. Thus, any interactions and impact should be considered to be long-term and the various project stages of operation/maintenance, re-powering and decommissioning should be taken into account by the Mona Offshore Wind Project. In addition, it is important that during the long-term interaction of the projects, the Burbo Bank consents (including consent conditions), and any stakeholder agreements entered into by Burbo Bank is not adversely affected.	Noted. Response received. The Burbo Bank Wind farm is considered as part of the baseline in Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	Yes
Mon_205_003_020623	S42	Email	Consent No. N/A Consent Section 36 Consent Project Title Burbo Bank Wind Farm Construction and Operation Status Operational Details Capacity of 90MW, 25 WTGs L/2014/00348 Marine Licence Cable repair Operational Repair of intra-array cables L/2018/00103 Marine Licence Cable repair Operational Repair of export cables. L/2016/00296 Marine Licence Operations and Maintenance activities Operational Removal of marine growth and/or guano, Replacement of corrosion protection anodes, Application of paint or other coatings, Modifications to J-tubes, Replacement of access ladders - major component replacement. L/2022/00397 Marine Licence Bird deterrents Operational	Noted. Response received.	No





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			Installation of varying bird deterrent technologies.		
			EIA/2023/00017 Marine Licence Improvement works Screening pre-application) Addition of blade extensions to each turbine blade.		
Mon_205_009_020623	S42	Email	Proximity The Mona Offshore Wind Project array area is expected to be 24.7km away from Burbo Bank. The Mona Offshore Wind Project offshore cable corridor is expected to be 13.6km away from Burbo Bank.	Noted. Response received.	Yes
Mon_205_010_020623	S42	Email	Effect on energy yield of Burbo Bank As set out, the proposed Mona Offshore Wind Project array is 24.7km away from Burbo Bank. Due to this proximity, there is the potential for the Mona Offshore Wind Project turbines to interfere with wind speed or wind direction of Burbo Bank and thus cause a reduction in energy output from the Burbo Bank turbines. This requires to be properly assessed, appropriate mitigation applied with any remaining adverse effects appropriately compensated.	Noted. Response received and considered in Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	Yes
Mon_205_011_020623	S42	Email	Navigation and shipping The area of the proposed Mona Offshore Wind Project has significant amounts of existing shipping activity. The information provided in the PEIR is not clear on the extent to which and the location within which vessel activity would increase during both the construction and operational phases. Given there is no information currently available on vessel routes or proposed construction or O+M ports, it is difficult to understand the potential risks to assets associated with the generation and transmission of electricity from Burbo Bank. It is noted that Mona Offshore Wind Project's Navigation Risk Assessment finds that "the impacts of the Mona Generation Assets would result in a hazard with an Unacceptable navigational risk score and therefore additional risk control options are required". We would appreciate if more information on this could be provided so we can properly understand and respond to the potential impacts and mitigations being proposed. It is important that any solutions properly take into account existing consent conditions and agreements. We would also appreciate being given the opportunity to input into and participate in discussions around navigational risks (including issues of search and rescue lanes and vessel traffic service) and mitigations.	Noted. Response received. The Barrow Offshore Wind farm is considered as part of the baseline in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement.	Yes
Mon_205_012_020623	S42	Email	Physical interaction of projects It is very important that Burbo Bank and its associated transmission assets can at all times be accessed to allow for appropriate Operation and Maintenance work and, in due course, upgrading, re-powering and decommissioning activities. It would therefore be useful to understand all of the Mona Offshore Wind Project components and routes associated with the proposed works (including proposed transmission works) so that we can establish that access for Burbo Bank, including access for jack-up vessels and anchor splays (etc.), will be maintained and that physical interactions can be avoided, or understood and appropriately mitigated.	Noted. Response received. The Barrow Offshore Wind farm is considered as part of the baseline in Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	Yes
Mon_205_013_020623	S42	Email	Helicopter activity It is difficult to quantify the level of impact helicopter usage during the construction and operation of the Mona Offshore Wind Project. It is noted that the PEIR highlights that there may be 2 helicopter supports completing 365 return trips during installation works. No heliport site(s) or transit route(s) have been identified within the PEIR documentation. We would appreciate if more information on this could be provided	Noted. Helicopter operations will be conducted in Class G (uncontrolled airspace) in Visual Meteorological Conditions (VMC) under normal Rules of the Air and the 'See and Avoid' principle. Daily construction, operation & maintenance helicopter movements, conducted below 5,000 ft above mean sea level (amsl), are likely insignificant compared to current Irish Sea Class G aviation activity. Heliport site(s) yet to be confirmed; further information	





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			so we can properly understand and respond to the potential impacts and mitigations being proposed.	can be provided in regard to helicopter support operations when he mode of operation has been decided.	
Mon_205_014_020623	S42	Email	Emergency response We would be happy to discuss with you appropriate communication and collaboration between Burbo Bank, Mona Offshore Wind Project, and other nearby offshore wind developments in circumstances where emergency responses are required, for example in the event of accidents or pollution spills.	Noted. Response received.	Yes
Mon_205_015_020623	S42	Email	Cumulative and in-combination effects of projects It is important to ensure that all environmental impacts of your project are properly and fully assessed including any potential cumulative or in combination effects with Burbo Bank. As an example, the impact upon Whooper Swan has been the subject of studies in relation to Burbo Bank and these studies have shown Whooper Swan transits through or close to your proposed development. Whooper Swan have so far been omitted in your offshore ornithology chapter. We would be happy to discuss with you the Whooper Swan studies, and your approach to potential cumulative or in combination effects generally, in order to help ensure a compliant assessment.	The Burbo Bank offshore wind farm has been considered in the cumulative screening for each topic. The outcomes of topic specific cumulative screening are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement. Project alone and cumulative collision assessment of Whopper swan are included in Volume 2, chapter 5: Offshore ornithology of the Environmental Statement.	
Mon_206_001_020623	S42	Email	We write on behalf of our client, Walney (UK) Offshore Windfarms Limited, the operator of Walney 1 and 2 windfarms ("Walney 1 and 2"), in response to your notification of a proposed application for a development consent order ("DCO") under section 48 of the Planning Act 2008. We write to register with you our interest in your proposal and in particular areas of potential interaction between your proposed development and Walney 1 and 2. Our response at this stage is based on documents currently made available regarding your project and our response will likely develop as more information is made available including during application and examination stage and as we further consider the potential interaction between the projects. We are also engaging on the proposed Morgan and Morecambe wind farms and intend also to engage on the proposed Morgan and Morecambe Transmission Assets during statutory consultation. Please can all responses to this representation be sent to REDACTED via the email address REDACTED.	Noted. Response received.	Yes
Mon_206_002_020623	S42	Email	Introduction: Interaction between Walney 1 and 2 and the Mona Offshore Wind Project Walney 1 and 2 Walney 1 and 2 are operational offshore wind farms with combined capacity of 367 MW and 102 wind turbine generators. Walney 1 and 2 hold a lease from the Crown Estate and operate pursuant to the below consents. Walney 1 and 2 are expected to continue to operate, be maintained, and may in due course be upgraded and repowered, and will at some stage be decommissioned. Thus any interactions and impact should be considered to be long-term and the various project stages of operation/maintenance, re-powering and decommissioning should be taken into account by the Mona Offshore Wind Project. In addition, it is important that during the long-term interaction of the projects, the Walney 1 and 2 consents (including consent conditions) and any stakeholder agreements entered into by Walney 1 and 2 are not adversely affected.	Noted. Response received. Walney 1 and 2 are considered as part of the baseline in Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	Yes
Mon_206_003_020623	S42	Email	Consent No. Consent Project Title Status Details N/A	Noted. Response received.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			Section 36 Consent Walney 1&2 Wind Farms Construction and Operation Operational Capacity of 367 MW, 102 WTGs L/2011/00067 Marine Licence Walney 1&2 Wind Farms Construction and Operation. Operational Capacity of 367 MW, 102 WTGs L/2014/00023 Marine Licence Cable repair Operational Repair of intra-array cables L/2016/00298 Marine Licence Operations and Maintenance activities Operational Removal of marine growth and/or guano, Replacement of corrosion protection anodes, Application of paint or other coatings, Modifications to J-tubes, Replacement of access ladders - major component replacement.		
Mon_206_004_020623	S42	Email	Proximity The Mona Offshore Wind Project array area is expected to be 34.0km and 32.8km away from Walney 1 and 2 respectively. The Mona Offshore Wind Project offshore cable corridor is expected to be 32.8km and 49.6km away from Walney 1 and 2 respectively.	Noted. Response received.	Yes
Mon_206_005_020623	S42	Email	Effect on energy yield of Walney 1 and 2 As set out, the proposed Mona Offshore Wind Project array is 34.0km and 32.8km away from Walney 1 and 2 respectively. Due to this proximity, there is the potential for the Mona Offshore Wind Project turbines to interfere with wind speed or wind direction of Walney 1 and 2 and thus cause a reduction in energy output from the Walney 1 and 2 turbines. This requires to be properly assessed, appropriate mitigation applied with any remaining adverse effects appropriately compensated.	Noted. Response received and considered in Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	Yes
Mon_206_006_020623	S42	Email	Navigation and shipping The area of the proposed Mona Offshore Wind Project has significant amounts of existing shipping activity. The information provided in the PEIR is not clear on the extent to which and the location within which vessel activity would increase during both the construction and operational phases. Given there is no information currently available on vessel routes or proposed construction or O+M ports, it is difficult to understand the potential risks to assets associated with the generation and transmission of electricity from Walney 1 and 2. It is noted that Mona Offshore Wind Project's Navigation Risk Assessment finds that "the impacts of the Mona Generation Assets would result in a hazard with an Unacceptable navigational risk score and therefore additional risk control options are required". We would appreciate if more information on this could be provided so we can properly understand and respond to the potential impacts and mitigations being proposed. It is important that any solutions properly take into account existing consent conditions and agreements. We would also appreciate being given the opportunity to input into and participate in discussions around navigational risks (including issues of search and rescue lanes and vessel traffic service) and mitigations.	Noted. Response received. Walney 1 and 2 are considered as part of the baseline in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_206_007_020623	S42	Email	Physical interaction of projects It is very important that Walney 1 and 2 and its associated transmission assets can at all times be accessed to allow for appropriate Operation and Maintenance work and, in due course, upgrading, re-powering and decommissioning activities. It would therefore be useful to understand all of the Mona Offshore Wind Project components and routes associated with the proposed works (including proposed transmission works) so that we can establish that access for Walney 1 and 2, including access for jack-up vessels and anchor splays (etc.), will be maintained and that physical interactions can be avoided, or understood and appropriately mitigated.	Noted. Response received. Walney 1 and 2 are considered as part of the baseline in Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	Yes
Mon_206_008_020623	S42	Email	It is difficult to quantify the level of impact helicopter usage during the construction and operation of the Mona Offshore Wind Project. It is noted that the PEIR highlights that there may be 2 helicopter supports completing 365 return trips during installation works. No heliport site(s) or transit route(s) have been identified within the PEIR documentation. We would appreciate if more information on this could be provided so we can properly understand and respond to the potential impacts and mitigations being proposed.	Noted. Helicopter operations will be conducted in Class G (uncontrolled airspace) in Visual Meteorological Conditions (VMC) under normal Rules of the Air and the 'See and Avoid' principle. Daily construction, operation & maintenance helicopter movements, conducted below 5,000 ft above mean sea level (amsl), are likely insignificant compared to current Irish Sea Class G aviation activity. Heliport site(s) yet to be confirmed; further information can be provided in regard to helicopter support operations when he mode of operation has been decided.	
Mon_206_009_020623	S42	Email	Emergency response We would be happy to discuss with you appropriate communication and collaboration between Walney 1 and 2, Mona Offshore Wind Project, and other nearby offshore wind developments in circumstances where emergency responses are required, for example in the event of accidents or pollution spills. Cumulative and in-combination effects of projects It is important to ensure that all environmental impacts of your project are properly and fully assessed including any potential cumulative or in combination effects with Walney 1 and 2. As an example, the impact upon Whooper Swan has been the subject of studies in relation to Walney 1 and 2 and these studies have shown Whooper Swan transits through or close to your proposed development. Whooper Swan have so far been omitted in your offshore ornithology chapter.	Noted. Response received. The Walney 1 and 2 have been considered in the cumulative screening for each topic. The outcomes of topic specific cumulative screening are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement. Project alone and cumulative collision assessment of Whopper swan are included in Volume 2, chapter 5: Offshore ornithology of the Environmental Statement.	Yes
Mon_206_010_020623	S42	Email	We write on behalf of our client, Walney Extension Limited, the operator of the Walney Extension Windfarm comprising Walney 3 and 4 ("Walney 3 and 4"), in response to your notification of a proposed application for a development consent order ("DCO") under section 48 of the Planning Act 2008. We write to register with you our interest in your proposal and in particular areas of potential interaction between your proposed development and Walney 3 and 4. Our response at this stage is based on documents currently made available regarding your project and our response will likely develop as more information is made available including during application and examination stage and as we further consider the potential interaction between the projects. We are also engaging on the proposed Morgan and Morecambe wind farms and intend also to engage on the proposed Morgan and Morecambe Transmission Assets during statutory consultation. Please can all responses to this representation be sent to REDACTED via the email address REDACTED.	Noted. Response received.	Yes
Mon_206_011_020623	S42	Email	Introduction: Interaction between Walney 3 and 4 and the Mona Offshore Wind Project Walney 3 and 4 Walney 3 and 4 are operational offshore wind farms with combined capacity of 660 MW and 87 wind turbine generators. Walney 3 and 4 hold a lease from the Crown Estate and operate pursuant to the below consents. Walney 3 and 4 are expected to continue to operate, be maintained, and may in due course be upgraded and repowered, and will at some stage be decommissioned. Thus any interactions and impact should be considered to be long-term and the	Noted. Response received. Walney 3 and 4 are considered as part of the baseline in Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			various project stages of operation/maintenance, re-powering and decommissioning should be taken into account by the Mona Offshore Wind Project. In addition, it is important that during the long-term interaction of the projects, the Walney 3 and 4 consents (including consent conditions) and any stakeholder agreements entered into by Walney 3 and 4 are not adversely affected.		
Mon_206_012_020623	S42	Email	Consent Project Title Status Details N/A Development Consent Order Walney 3 and 4 Wind farm construction, operation and maintenance Operational Capacity of 660 MW and 87 WTGs. Removal of marine growth and/or guano, Replacement of corrosion protection anodes, Application of paint or other coatings, Modifications to J-tubes, Replacement of access ladders - major component replacement. L/2019/00037 Marine Licence Walney Extension Pontoon and lead-in jetty (maintenance) Dredge and Disposal Licence (Barrow D). Operational 24,000 m3 per annum EIA/2023/00015 Marine Licence Improvement works Screening pre-application Addition of blade extensions to each turbine blade.	Noted. Response received.	Yes
Mon_206_013_020623	S42	Email	Proximity The Mona Offshore Wind Project array area is expected to be 30.4km and 27.3km away from Walney 3 and 4 respectively. The Mona Offshore Wind Project offshore cable corridor is expected to be 43.9km and 53.6km away from Walney 3 and 4 respectively. The PEIR also makes clear that the arrays and cable corridor will be, respectively, 45.3 km and 55.3km from the Walney Extension Pontoon and lead-in jetty.	Noted. Response received.	Yes
Mon_206_014_020623	S42	Email	Effect on energy yield of Walney 3 and 4 As set out, the proposed Mona Offshore Wind Project array is 30.4km and 27.3km away from Walney 3 and 4 respectively. Due to this proximity, there is the potential for the Mona Offshore Wind Project turbines to interfere with wind speed or wind direction of Walney 3 and 4 and thus cause a reduction in energy output from the Walney 3 and 4 turbines. This requires to be properly assessed, appropriate mitigation applied with any remaining adverse effects appropriately compensated.	Noted. Response received and considered in Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	Yes
Mon_206_015_020623	S42	Email	Navigation and shipping The area of the proposed Mona Offshore Wind Project has significant amounts of existing shipping activity. The information provided in the PEIR is not clear on the extent to which and the location within which vessel activity would increase during both the construction and operational phases. Given there is no information currently available on vessel routes or proposed construction or O+M ports, it is difficult to understand the potential risks to assets associated with the generation and transmission of electricity from Walney 3 and 4. It is noted that Mona Offshore Wind Project's Navigation Risk Assessment finds that "the impacts of the Mona Generation Assets would result in a hazard with an Unacceptable navigational risk score and therefore additional risk control options are required".		Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			We would appreciate if more information on this could be provided so we can properly understand and respond to the potential impacts and mitigations being proposed. It is important that any solutions properly take into account existing consent conditions and agreements. We would also appreciate being given the opportunity to input into and participate in discussions around navigational risks (including issues of search and rescue lanes and vessel traffic service) and mitigations.		
Mon_206_016_020623	S42	Email	Physical interaction of projects It is very important that Walney 3 and 4 and its associated transmission assets can at all times be accessed to allow for appropriate Operation and Maintenance work and, in due course, upgrading, re-powering and decommissioning activities. It would therefore be useful to understand all of the Mona Offshore Wind Project components and routes associated with the proposed works (including proposed transmission works) so that we can establish that access for Walney 3 and 4, including access for jack-up vessels and anchor splays (etc.), will be maintained and that physical interactions can be avoided, or understood and appropriately mitigated.	Noted. Response received. Walney 3 and 4 are considered as part of the baseline in Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	Yes
Mon_206_017_020623	S42	Email	Helicopter activity It is difficult to quantify the level of impact helicopter usage during the construction and operation of the Mona Offshore Wind Project. It is noted that the PEIR highlights that there may be 2 helicopter supports completing 365 return trips during installation works. No heliport site(s) or transit route(s) have been identified within the PEIR documentation. We would appreciate if more information on this could be provided so we can properly understand and respond to the potential impacts and mitigations being proposed. Emergency response We would be happy to discuss with you appropriate communication and collaboration between Walney 3 and 4, Mona Offshore Wind Project, and other nearby offshore wind developments in circumstances where emergency responses are required, for example in the event of accidents or pollution spills.	Noted. Helicopter operations will be conducted in Class G (uncontrolled airspace) in Visual Meteorological Conditions (VMC) under normal Rules of the Air and the 'See and Avoid' principle. Daily construction, operation & maintenance helicopter movements, conducted below 5,000 ft above mean sea level (amsl), are likely insignificant compared to current Irish Sea Class G aviation activity. Heliport site(s) yet to be confirmed; further information can be provided in regard to helicopter support operations when he mode of operation has been decided. The offer of a collaborative approach to emergency cooperation (within in a consolidated Irish Sea Offshore Wind Emergency Response and Cooperation Plan (ERCoP) is both welcome and logical.	
Mon_206_018_020623	S42	Email	Cumulative and in-combination effects of projects It is important to ensure that all environmental impacts of your project are properly and fully assessed including any potential cumulative or in combination effects with Walney 3 and 4. As an example, the impact upon Whooper Swan has been the subject of studies in relation to Walney 3 and 4 and these studies have shown Whooper Swan transits through or close to your proposed development. Whooper Swan have so far been omitted in your offshore ornithology chapter. We would be happy to discuss with you the Whooper Swan studies, and your approach to potential cumulative or in combination effects generally, in order to help ensure a compliant assessment. Radar We would like to understand better from you your proposed radar mitigation	The Walney 3 and 4 have been considered in the cumulative screening for each topic. The outcomes of topic specific cumulative screening are presented in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement.	Yes
Mon_207_001_020623	S42	Email	We write on behalf of our client, Burbo Extension Ltd, the operator of the Burbo Bank Extension Wind Farm ("Burbo Bank Extension") in response to your notification of a proposed application for a development consent order ("DCO") under section 48 of the Planning Act 2008. We write to register with you our interest in your proposal and in particular areas of potential interaction between your proposed development and Burbo Bank Extension. Our response at this stage is based on documents currently made available regarding your project and our response will likely develop as more information is made available including during application and examination stage and as we further consider the potential interaction between the projects. We are also engaging on the proposed Morgan and Morecambe wind farms and		Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			intend also to engage on the proposed Morgan and Morecambe Transmission Assets during statutory consultation. Please can all responses to this representation be sent to REDACTED via the email address REDACTED.		
Mon_207_002_020623	S42	Email	Introduction: Interaction between Burbo Bank Extension and the Mona Offshore Wind Project Burbo Bank Extension Burbo Bank Extension is an operational offshore wind farm with capacity of 258 MW and 32 wind turbine generators. Burbo Bank Extension holds a lease from the Crown Estate and operates pursuant to the below consents. Burbo Bank Extension is expected to continue to operate, be maintained, and may in due course be upgraded and repowered, and will at some stage be decommissioned. Thus any interactions and impact should be considered to be long-term and the various project stages of operation/maintenance, re-powering and decommissioning should be taken into account by the Mona Offshore Wind Project. In addition, it is important that during the long-term interaction of the projects, the Burbo Bank Extension consents (including consent conditions) and any stakeholder agreements entered into by Burbo Bank Extension is not adversely affected.	Noted. Response received.	Yes
Mon_207_003_020623	S42	Email	Consent No.: N/A Consent: Development Consent Order Project Title: Burbo Bank Extension Wind Farm Construction, Operations and Maintenance. Status: Operational Details: Capacity of 258 MW, 32 WTGs Removal of marine growth and/or guano, Replacement of corrosion protection anodes, Application of paint or other coatings, Modifications to J-tubes, Replacement of access ladders - major component Consent No.: L/2017/00296 Consent: Marine Licence Project Title: Cable repair Status: Operational Details: Repair of intra-array cables	Noted. Response received.	Yes
Mon_207_005_020623	S42	Email	Offshore proximity The Mona Offshore Wind Project array area is expected to be 24.7km away from Burbo Bank Extension. The Mona Offshore Wind Project offshore cable corridor is expected to be 13.6km away from Burbo Bank Extension.	Noted. Response received.	Yes
Mon_207_006_020623	S42/S44	Email	Onshore proximity Like Burbo Bank Extension, the Mona Offshore Wind Project's intended landfall is on the North Wales coastline and its intended connection to the grid is via the Bodelwyddan National Grid substation. The proposed substation locations are in close proximity to the existing Burbo Bank Extension substation. We would appreciate if more information could be provided on the proximity of the proposed substation options, the proximity of the onshore cable routes leading to the proposed substation options, and any impacts of this proximity. This may include cumulative effects on noise, potential cable crossings, or impacts on access to Burbo Bank Extension cables and substation for Operation and Maintenance and other work. These impacts require to be properly assessed, appropriately mitigated, and any remaining adverse effects appropriately compensated.		No
Mon_207_007_020623	S42	Email	Effect on energy yield of Burbo Bank Extension As set out, the proposed Mona Offshore Wind Project array is 24.7km away from Burbo Bank Extension. Due to this proximity, there is the potential for the Mona Offshore Wind Project turbines to interfere with wind speed or wind direction of Burbo Bank Extension and thus cause a reduction in energy output from the Burbo Bank	Noted. Response received and considered in Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			Extension turbines. This requires to be properly assessed, appropriate mitigation applied with any remaining adverse effects appropriately compensated.		
Mon_207_011_020623	S42	Email	Emergency response We would be happy to discuss with you appropriate communication and collaboration between Burbo Bank Extension, Mona Offshore Wind Project, and other nearby offshore wind developments in circumstances where emergency responses are required, for example in the event of accidents or pollution spills.	The offer of a collaborative approach to emergency cooperation (within in a consolidated Irish Sea Offshore Wind Emergency Response and Cooperation Plan (ERCoP) is both welcome and logical.	Yes





D.25.16 Geology, hydrogeology and ground conditions table of responses



Table D.25. 16: Geology, hydrogeology and ground conditions table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Formal response	Project change (directly or indirectly as a result of feedback)
Mon_052_002_010623	S44	Email	As you can see from the questions that I raised during the webinar the critical issue for myself and the fishery business is the absolute need to protect the surface and underground water sources that supply the fishery lakes from any form of temporary or permanent disruption. To this end we are very keen to engage with the Mona team in determining what surveys and detailed further investigations you plan to undertake to then allow you to develop your detailed construction strategy such that you guarantee our water sources are protected. We see the engagement process with your team as being very much an interactive and at the same time an iterative one that will allow both sides to gain a full appreciation of the issues as they affect the fishery.	Following the statutory consultation, the Onshore Cable Corridor has been refined to deselect options along the Onshore Cable Corridor and to reduce the width of the corridor. The refinement process was informed by comments received during the consultation process and by engineering design. The refined Onshore Cable Corridor is now further away from Tan-y-Myndd Trout Fishery Ltd.	Yes
Mon_054_012_010623	S42/S44	Email	Groundwater Protection and Land Contamination: NRW (A) provide advice on further information and assessments required	The Applicant notes your response.	No
Mon_054_014_010623	S42/S44	Email	Controlled Water Pollution Prevention: NRW(A)have no significant issues with the PEIR. We provide advice on some further details required.	The Applicant notes your response.	No
Mon_054_453_010623	S42/S44	Email	Groundwater Protection and Land Contamination Volume 3, Chapter 16: Geology, Hydrogeology and Ground Conditions Section 16.4Baseline environment, outlines the baseline conditions within the study area for the landfall. NRW (A) note Table 16.14Measures adopted as part of the Mona Offshore Wind Project, and the primary and tertiary measures outlined, however, it is our opinion that this section is fairly high-level and does not provide the details or risk assessments that should be included see our "Approach to Groundwater Protection" guidance position available here. NRW (A) will be able to provide further advice once further detail is provided.	The baseline hydrogeology and risks to groundwater are identified in Volume 3, Chapter 1: Geology, hydrogeology and ground conditions. There are no Source Protection Zones within the geology, hydrogeology and ground conditions study area; the location of private groundwater abstractions are identified in Volume 7, Annex 1.1: Aquifers, Groundwater abstractions and ground conditions of the Environmental Statement. The risk to these groundwater supplies is considered in Volume 7, Annex 1.2: Groundwater sources of supply – hydrogeological risk assessment and included in the assessment Volume 3, Chapter 1: Geology, hydrogeology and ground conditions. Outline management plans are appended to the Outline Code of Construction Practice (Document reference J26) which set out the mitigation measures that will be implemented to protect groundwater sources. These management plans are secured (as part of the CoCP) as a requirement in the DCO and will be approved by the relevant planning authority.	No
Mon_054_454_010623	S42/S44	Email	More information should be provided on the Horizontal Directional Drilling (HDD) area from offshore to onshore, the method used, the depth, the drilling for the cable route and how this will interact with the local water table and regional groundwater levels and flows. This will require a controlled waters risk assessment to support the use of this cabling method. The details indicate cofferdams and dewatering for the reception pits –dewatering over 20m3/day may require a Water Resource Abstraction Licence and we recommend early engagement with NRW Permitting Teams. This type of licence will also be required for trenched cabling methods that require dewatering.	Groundwater near the landfall is described in the baseline conditions of Volume 3, Chapter 1 Geology and Ground Conditions of the Environmental Statement. An Outline Landfall Construction Method Statement is included within the Outline CoCP (Document Reference J26.14). It provides a description of the methods that will be employed at the transition joint bay and is based on a trenchless technique design. Following refinements made following the statutory consultation, the design no longer includes open cut trenching seaward of MHWS and therefore, does not require the use of cofferdams. A final Landfall Method Statement will be prepared during detailed design and will be informed by the results of intrusive investigations. Where required, environmental permits (for abstraction or dewatering) will be secured prior to construction commencing.	Yes
Mon_054_455_010623	S42/S44	Email	Confirmation is sought on whether the cables will be fluid filled. If they are, please consider the "Approach to Groundwater Protection" guidance position statement C5 and submit any risk assessment for their use.	The onshore export cables for the Mona Offshore Wind Project will not be fluid filled. Information about the Onshore Cable design is provided in Volume 1, Chapter 3: Project description of the Environmental Statement.	No
Mon_054_456_010623	S42/S44	Email	NRW (A)note the potential use of a septic tank for foul water disposal and advise that an environmental permit may be required.	An Outline Construction Surface Water and Drainage Management Plan (Document Reference J26.6) and an Outline Operational Drainage Management Strategy (Document Reference J28) have been prepared. Where required, environmental permits (for foul water discharge) will be secured prior to construction commencing.	No
Mon_054_457_010623	S42/S44	Email	NRW (A) understand that the private water supply survey and risk assessment is yet to be completed and advise that this is done as soon as possible to allow time		No





WONA OFFSHORE WINI	J FROJECT				
			to monitor sensitive sources of supply and for mitigation measures to be agreed with the source owner or user.		
Mon_054_458_010623	S42/S44	Email	From the information provided NRW (A)note that the Code of Construction Practice (CoCP) is a live document and will be updated as the works commence. The generic details for the pollution preventions measures are suitable to be protective of groundwater, but more specific details may be required once all the surveys are completed, and the final cable route is set.	The CoCP is supported by a number of management plans that provide specific measures for controlling impacts. The final versions of these management plans will be approval by the relevant authority prior to construction through a Requirement of the DCO.	No
Mon_054_503_010623	S42/S44	Email	Similarly, Sections 18.8.3.31 to18.8.3.43Hedgerows, should also be reconsidered in light of the above (by a Geomorphologist). More details of the geomorphological impacts associated with the proposals should be provided and suitable expertise sought.	Noted - Each of the watercourses traversed by the Mona Onshore Development Area have been surveyed for otter, aquatic invertebrates, fish and eels. A note of the condition of each channel has been made and the hydromorphological sensitivity of the watercourse is reported to be low with most being ephemeral watercourses or dry ditches. This information has been used in the assessment and is reported in Volume 7, Annex 2.4: Water Framework Directive Surface Water and Groundwater Assessment.	No
Mon_054_532_010623	S42/S44	Email	The onshore development area is in close proximity to protected sites. Should any contaminated water or materials enter or pollute the watercourse or groundwater, NRW must be notified on 03000 65 3000.	The Applicant notes your response.	No
Mon_054_533_010623	S42/S44	Email	The location of historic landfills to the site works must be checked before work commences.	The locations of historic landfill have been identified in Volume 7, Annex 1.1: Aquifers, groundwater abstractions and ground conditions of the Environmental Statement.	No
Mon_054_534_010623	S42/S44	Email	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.	The measures for storing fuels and chemicals are set out in the Outline Spillage and Emergency Response Plan (Document Reference J26.1).	No
Mon_075_002_020623	S44	Email	Dear Sirs, I would like to contribute towards the statutory consultation process on behalf of REDACT and REDACT and REDACT relating to land covered by Works 18 and circled blue on the plan below (refer to response). This land has a very difficult topography and nature which cause it to severely hold water. To counter this the land has recently benefited from a drainage scheme that has cost almost £12,000 and the drainage now works very well indeed. The installation of cables will severely interfere with this and seriously impair the land. Notwithstanding this, it is the family's view that this land is not suitable for the route of this cable because there have been approaches for other alternative leisure and commercial uses on the land that the cable routes will sterilise and prevent happening which is contrary to the landowner's wishes. Further, the land is especially unsuitable for use as a temporary working area or compound and haul road due to the long term damage that this will inevitably do to the land in terms of compaction and soil strata mixing and further drainage issues. Please locate both pipes and works 18 compound elsewhere.	The project will be working with a drainage contractor to ensure there is suitable pre and post construction drainage. The project would welcome plans of the newly installed drainage so this can be considered in designs going forward. In the event that substantiated and tangible losses are incurred as a result of the project, they will be compensated for under the compensation code upon the implementation of the DCO.	No
Mon_076_002_030623	S44	Email	They wish to raise the following matters: 1. Utilities and flooding Work areas 10D and 20 will cut off their water supply which runs through that field from the top road to their house. The field slopes down towards their house and in the past has brought down surface water which has caused flooding. They have paid for work to be undertaken which has now remedied the flooding, however they are concerned that any construction work in the field will cause disruption and potentially cause the flooding to return. 2. Noise and pollution All three routes are extremely close to their home. Given their close proximity,	The Applicant is working with all utility suppliers to determine the precise location of buried utilities, and the project does not intend to interrupt or divert the delivery of any current utility service. The Environmental Statement Human Health chapter follows guidance (IEMA 2022) in providing a population health assessment. The assessment has regard to vulnerable groups, and in this case assigns them the highest level of sensitivity, but (in line with the assessment methodology set out in guidance) does not reach conclusions on individual level health outcomes. The Environmental Statement Human Health chapter has had regard to local	No





			they are concerned about continuous noise and pollution from plant and vehicles that will emanate from the construction site over a period of time and the adverse impact this will have upon their health and well being. 3. Health They are elderly, and this is their retirement home. During the last 9 months they have both suffered with significant ill health and both been hospitalised. Peace and quiet enjoyment of their home is very important for their health. 4. Financial They purchased the land and two stone barns in 1989. They spent the next 12 years developing the site at their own cost which involved considerable hard work. They moved to live there in 2001. Their home is their principle investment and the prospect of this work to the adjacent land will almost certainly have devalued their home already. This will have a significant impact upon their finances. Should the need arise to sell the property; the construction work will have to be disclosed to any potential buyer and will act as a deterrent to any future sale.	sensitivities, including in relation to age, health status and income, across the scope of issues covered by the assessment. The health assessment scope includes the public health implications of construction effects. Measures to minimise the impacts of construction are set out in the Outline CoCP (Document Reference 26) and its appendices. This includes measures for managing flood risk, dust and noise. A detailed CoCP will be agreed with the relevant stakeholder before construction commences. In the event that substantiated and tangible losses are incurred as a result of the project, they will be compensated for under the compensation code upon the implementation of the DCO.	
Mon_149_003_260523	S47	Feedback form	Residents have concerns over the disruption that may be caused over the location of the major substations. Cables might cause problems with soil movements and locations. It is a great worry with the size of the substation.	Since PEIR, the project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform to reduce impacts to Cefn Meiriadog. Please refer to Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference F1.4) for the site selection process associated with the selection of the final onshore substation location for the purposes of the DCO application. The quality of agricultural land within the land use and recreation study area is identified in Volume 7, Annex 7.1: Published soil and Agricultural Land Classification data technical report and Volume 7, Annex 7.2: Soil survey data technical report of the Environmental Statement (Document References: F7.7.1 and F7.7.2). Measures adopted as part of the Mona Offshore Wind Project to mitigate impacts on best and most versatile agricultural land and farm holdings within the land use and recreation study area are considered in Volume 3, Chapter 7: Land use and recreation of the Environmental Statement (Document Reference F3.7).	No
Mon_149_007_260523	S47	Feedback form	Ground conditions could be influenced by cable laying and construction. This is worrying considering the land around the sites.	A full assessment of the impacts on the Mona Offshore Wind Project on ground conditions is provided in Volume 3, Chapter 1 Geology, Hydrology and Ground Conditions of the Environmental Statement.	No
Mon_158_019_020623	S44	Feedback form	Protected Limestone mineral in Cefn Meiriadog. Noted on Denbighshire maps. Safeguarding in place? If not, please explain why?	Mineral safeguarding is considered in Volume 3, Chapter 1: Geology, hydrogeology and ground conditions of the Environmental Statement	No
Mon_164_006_040623	S44	Feedback form	Several nearby neighbours of mine rely on wells, which draw from aquifers in the path of the onshore power line route - this is likely to negative influence their water supply.	The Onshore Cable Corridor has been refined following the statutory consultation: options along the corridor have been deselected and the width of the corridor has been reduced. Alongside this refinement, an assessment of the potential impacts on private groundwater supplies as a result of the Mona Offshore Wind Project has been included in Volume 7, Annex 1.2: Groundwater sources of supply - hydrogeological risk assessment of the Environmental Statement. Where impacts may occur, appropriate mitigation measures have been identified.	Yes
Mon_164_009_040623	S44	Feedback form	Several nearby neighbours of mine rely on wells, which draw from aquifers in the path of the onshore power line route - this is likely to negative influence their water supply.	The Onshore Cable Corridor has been refined following the statutory consultation: options along the corridor have been deselected and the width of the corridor has been reduced. Alongside this refinement, an assessment of the potential impacts on private groundwater supplies as a result of the Mona Offshore Wind Project has been included in Volume 7, Annex 1.2: Groundwater sources of supply - hydrogeological risk assessment of the Environmental Statement. Where impacts may occur, appropriate mitigation measures have been identified.	Yes

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D.25.17 Hydrology and flood risk table of responses



Table D.25. 17: Hydrology and flood risk table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Formal response	Project change (directly or indirectly as a result of feedback)
Mon_014_001_210423	S47	Email	Based on the consultation documents and location plan, which shows the order limits of the forthcoming Development Consent Order (DCO), then the Canal & River Trust (Glandwr Cymru in Wales) have no comments to make, as our assets and infrastructure would not be impacted by the proposed works. We do not need to be consulted further in relation to this project.	The Applicant notes your response.	No
Mon_054_014_010623	S42/S44	Email	Controlled Water Pollution Prevention: NRW(A)have no significant issues with the PEIR. We provide advice on some further details required.	The Applicant notes your response	No
Mon_054_016_010623	S42/S44	Email	Onshore WFD: NRW (A)provide advice on corrections / clarifications and further detail required	The Applicant notes your response	No
Mon_054_017_010623	S42/S44	Email	Hydro morphological Elements of the WFD: NRW (A) disagree with the conclusions of some assessments and provide advice on the potential impacts of some of the proposed activities.	Updated WFD assessments have been provided with the application (Volume 6, Annex 2.2 Water Framework Directive Coastal Waters Assessment and Volume 7, Annex 2.4 Water Framework Directive Surface Water and Groundwater Assessment of the Environmental Statement).	No
Mon_054_018_010623	S42/S44	Email	Hydrology: NRW (A) defer detailed comment until further details on the works are provided at application stage. We provide advice on appropriate mitigation.	The Applicant notes your response	No
Mon_054_019_010623	S42/S44	Email	Flood Risk: NRW (A) provide advice on some corrections/clarifications required.	The Applicant notes your response	No
Mon_054_121_010623	S42/S44	Email	Volume 6, Annex 7.2 Water Framework Directive Coastal Waters Assessment NRW (A) agree with the scoping conclusions in Table 1.19 Summary of scoping for WFD receptors in the North Wales coastal water body and the Clwyd transitional water body, for the North Wales and Clwyd water bodies.	The Applicant notes your response	No
Mon_054_488_010623	S42/S44	Email	Onshore Water Framework Directive Compliance Assessment Volume 7, Annex 17.4: Water Framework Directive surface water and groundwater assessment.	The Applicant notes your response	No
Mon_054_489_010623	S42/S44	Email	NRW (A) agree with the water bodies identified in the zone of influence of the onshore aspects of the scheme. However, there is currently insufficient detail to assess the impacts and comment on the conclusions.	The Applicant notes your response	No
Mon_054_490_010623	S42/S44	Email	NRW (A) note the reference to an earlier version of NRW internal guidance: Guidance for assessing activities and projects for compliance with the Water Framework Directive (NRW, 2018). We can provide the latest version of this guidance.	Volume 7, Annex 2.4: Water Framework Directive Surface Water and Ground Assessment has been undertaken in accordance with the 2023 guidance from NRW. The reference in the annex has been updated.	No
Mon_054_491_010623	S42/S44	Email	NRW (A) would expect to see summary of/signposting to potential for incombination and/or cumulative effects as described in the NRW internal guidance: OGN72Complying with the Water Framework Regulations 2017 – how to assess and appraise projects and activities documentation. This can include other project activities taking place in a water body.	In combination and cumulative effects are addressed in Volume 3, Chapter 2: Hydrology and flood risk of the Environmental Statement.	No
Mon_054_492_010623	S42/S44	Email	NRW (A)note some minor inaccuracies that should be clarified/corrected within the ES: The description in Section 1.5.2.17 Gele, is inaccurate. Macrophyte subelement is actually poor status, but it does not drive the classification because of the Heavily Modified Water Body (HMWB) designation. The summary information in Table 1.3Surface water body classification within the WFD Assessment study area, is correct. NRW (A) query whether Table 1.12Potential impacts associated with Mona	Volume 7, Annex 2.4 Water Framework Directive Surface Water and Groundwater Assessment of the Environmental Statement has been updated to address inaccuracies and typographical errors.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Formal response	Project change (directly or indirectly as a result of feedback)
			Proposed Onshore Development Area and outcome of scoping assessment for the WFD compliance assessment for onshore surface water bodies, refers to groundwater rather than surface water despite the title? In Section 1.7.6.2 Assessment summary and conclusion, with regard to the Western Wales River Basin Management Plan (RBMP)2022-2027–this plan should be referred to as 2021-2027.		
Mon_054_496_010623	S42/S44	Email	Hydro-Morphological Elements of the Water Framework Directive Volume 3, Chapter 18 Onshore Ecology With reference to Section 18.8.2.18Waterbodies including ponds, ditches and streams, it states that "there will be a temporary loss of riparian habitat where open cut techniques are used to cross ditches and streams." Depending on the vegetation present, this may be a near permanent loss – i.e. if trees were felled. As such, alternatives such as directional drilling should be considered as compensatory habitat of similar quality and quantity is unlikely to be able to be provided. Open cut crossings are not routinely permitted and would be objected to in unsuitable locations. Details of all open cut crossings should be provided as soon as possible.	Crossing schedule provided (see Volume 5, Annex 4.3: Onshore Crossing Schedule of the Environmental Statement) and WFD assessment updated on basis of the detail in the crossing schedule and sensitivities of the watercourses and associated riparian habitat.	No
Mon_054_497_010623	S42/S44	Email	With reference to Section 18.8.2.19Waterbodies including ponds, ditches and streams, it states that, "Temporary loss of habitat will also occur at Mona Onshore Substation option 7as a result of the realignment of the ordinary watercoursecould impact on the habitat and hydromorphological supporting conditions". Realigning rivers, unless to restore previous courses, is a very high-risk geomorphological activity (potentially causing large scale negative reactions such as avulsion —which if located near infrastructure could be very costly and risk lives as well as properties) and will impact on hydromorphological condition. As such realignment of watercourses is generally not permitted.	The Mona Onshore Development Area was refined following the Section 42 Consultation: Mona Onshore Substation option 7 was deselected (see Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement). A minor watercourse is located at the Onshore Substation platform and will be realigned. The watercourse is a ditch and was dry during site surveys (as reported in Volume 7, Annex 3.15: Fish and eel survey technical report of the Environmental Statement). The ecological value of the channel is low being channelised and homogenous in its form and channel substrate. The opportunity will be taken to improve the new channel to a more natural channel with improved channel form, substrate and sinuosity for net biodiversity benefit.	No
Mon_054_498_010623	S42/S44	Email	With reference to Section 18.8.2.20Waterbodies including ponds, ditches and streams, it states that, "The impact on ditches and streams crossed by open cut trenching is predicted to be short term and the water courses will be re-instated and, as such, will only be impacted in the short term". Given that >90% of the UK watercourses are still impacted by dredging undertaken in the 1700's and 1800's such a broad-brush statement is not true. Physical modification of watercourses remains the primary reason for waterbody failure in Wales and as such open cut trenching will be objected to in unsuitable locations. Details of all open cut crossings should be provided as soon as possible.	The crossing schedule is provided at Volume 5, Annex 4.3: Onshore crossing schedule of the Environment Statement; the WFD assessment is updated on basis of the detail in the crossing schedule and sensitivities of the watercourses and associated riparian habitat.	No
Mon_054_499_010623	S42/S44	Email	With reference to Section 18.8.2.24 –25Significance of effect, realignment of watercourses causes damage to geomorphological form and processes that can last centuries. NRW (A) therefore advise that the conclusion of "Moderate adverse significance" should be reclassified.	Realignment of the watercourse at the Onshore Substation has been considered in Volume 7, Annex 2.4 Water Framework Directive Surface Water and Groundwater Assessment of the Environmental Statement. Surveys indicate that the unnamed watercourse has either been filled in or culverted, the realignment will be designed to introduce a more natural channel will that will aim to achieve net biodiversity benefit (see Outline Operational Drainage Management Strategy Document Reference J28).	No
Mon_054_500_010623	S42/S44	Email	With reference to Section 18.8.2.27 Decommissioning, under the Well-being of Future Generations Act (Wales) 2015, full decommissioning should be the primary aim. Watercourses with abandoned infrastructure will cost taxpayers significant sums in future decades and centuries when these elements become exposed given the naturally mobile nature of rivers. As such, the conclusion of 'no change' in terms of the magnitude of impact in Section 18.8.2.28, needs reconsidering.	The watercourses traversed by the Mona Onshore Development Area are minor watercourses that are ephemeral streams or ditches; they will primarily be crossed using trenchless techniques. Watercourses may also be crossed by the haul road: the method statement for watercourse crossings will be set out in the Construction Method Statement and will be agreed with the relevant stakeholders prior to construction. Approval for the decommissioning plan will be secured from the Local Planning Authority (LPA) under the DCO Requirements.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Formal response	Project change (directly or indirectly as a result of feedback)
Mon_054_501_010623	S42/S44	Email	With reference to Section 18.8.2.29 & 21, 22, 23—all watercourses have a high vulnerability to hydro-morphological impact too.	Noted - Each of the watercourses traversed by the Mona Onshore Development Area have been surveyed for otter, aquatic invertebrates, fish and eels. A note of the condition of each channel has been made and the hydromorphological sensitivity of the watercourse is low with most being ephemeral watercourses or dry ditches. This information has been used in the assessment and is reported in Volume 7, Annex 2.4: Water Framework Directive Surface Water and Groundwater Assessment.	
Mon_054_504_010623	S42/S44	Email	Hydrology Volume 3, Chapter 17Hydrology and Flood Risk As identified in the chapter the biggest risk to hydrology is the river crossings. The detailed information about these river crossings and whether they will be HDD or open will be provided at DCO stage, so until that point it is not possible to comment in further detail. The method chosen should ensure that no water is lost from the water course in both the short and long term.	The Applicant notes your response	No
Mon_054_505_010623	S42/S44	Email	Flood Risk Volume 3, Chapter 17Hydrology and Flood Risk In the glossary, NRW (A)would expect reference to be made to Flood Risk Activity Permits (FRAPs) and Flood Defence (or Ordinary watercourse) Consents. FRAPs would be required for activities in or near a (designated) main river and associated flood defences and/or within a flood plain of a main river from NRW. Ordinary Watercourse Consents (OWC)would be required for works in an ordinary watercourse from the relevant Lead Local Flood Authority (LLFA) (Local Authority).	References to Flood Risk Activity Permits (FRAP) and Ordinary Watercourse Consents have been added and glossaries have been updated to include these terms. The Applicant will be seeking the disapplication of both the FRAPs and ordinary watercourse that are to be incorporated as protected provisions of the consent order (as set out in Other Consents or Licences Required (Document reference J1).	No
Mon_054_506_010623	S42/S44	Email	Noted that reference is made to Discharge consent (which are separate to FRAPS/OWCs).	The Applicant notes your response	No
Mon_054_507_010623	S42/S44	Email	Also in the Glossary reference is made to Flood Zones (FZ) 1,2,3 and 3b. There are no FZ 3b in flood mapping used in Wales. For new development proposals in Wales, the maps referred to should be the Flood Map for Planning (as per the letter from Welsh Government dated 15 December 2021). It is therefore suggested that the Flood Consequence Assessment (FCA)should refer to Technical Advice Note (TAN) 15 Development and Flood Risk (2004) as the current document for land-based planning in Wales. It is expected that an updated version of TAN15 will be released by Welsh Government.	The glossary in Volume 3, Chapter 2 Hydrology and flood risk of the Environmental Statement has been updated to include these terms. Volume 7, Annex 2.1 Flood Consequences Assessment refers to the 2004 TAN 15.	No
Mon_054_508_010623	S42/S44	Email	NRW (A)advise that in Wales there are SuDs Approval Bodies (SABs)and expand that the Lead Local Flood Authorities (LLFAs)are also responsible for managing flood risk from surface water, groundwater and from smaller streams called ordinary watercourses	Noted. Reference has been made to LLFA to SAB in Volume 3, Chapter 2 Hydrology and flood risk of the Environmental Statement	No
Mon_054_509_010623	S42/S44	Email	Table 17.2 Summary of NPS EN-1 policy on decision making relevant to hydrology and flood risk, refers to the sequential test. "Sequential tests" is a reference used in England when deciding on site selection and flood risk. For Wales, the relevant section of TAN15 would be Section 6 for the Justification tests and reference is made to zones C, B and A for Wales within the same summary (NPS EN-1 provision). Section1.5.4.5of the FCA is however correct.	Noted. Volume 3, Chapter 2 Hydrology and flood risk of the Environmental Statement has been updated with relevant Welsh guidance. Volume 7, Annex 2.1 Flood Consequences Assessment was undertaken in line with Welsh policy guidance	No
Mon_054_510_010623	S42/S44	Email	Table 17.6Summary of key consultation issues raised during consultation activities undertaken for the Mona Offshore Wind Project relevant to hydrology and flood risk–May 2022–Response to NRW issue. The Flood Map for Planning (FMfP)should be used and not the Flood Risk Assessment Wales (FRAW)maps. The FMfP allows for climate change whilst the FRAW	The mapping in Volume 7, Annex 2.2: Surface watercourses and NRW flood zones of the Environmental Statement has been updated to use the Flood Map for Planning	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Formal response	Project change (directly or indirectly as a result of feedback)
			maps do not. Incorrect maps have therefore been utilised to accompany the figures in Volume 7 Annex 17.1: Flood Consequence Assessment.		
Mon_054_511_010623	S42/S44	Email	It is noted and agreed with Section 17.4.4.5NRW designated Main Rivers, that there are no main rivers identified within the Mona hydrology and flood risk study area.	The Applicant notes your response	No
Mon_054_512_010623	S42/S44	Email	Please confirm that the reference in Section 17.4.4.16and Table 17.11Flood Map for Planning Flood Zones, relates to the Flood Map for Planning (rather than the FRAW) and advise that the FMfP allows for the impacts of climate change in the definitions. (may be taken from Figure 2 in the draft updated Technical Advice Note 15, Developing, flooding and coastal erosion (gov.wales)).	The Applicant notes your response and clarity has been provided in Volume 7, Annex 2.1: Flood consequences assessment of the Environmental Statement.	No
Mon_054_513_010623	S42/S44	Email	Sections 17.4.4.17 –18 NRW Flood Zones are noted–reference to 75 years for non-residential developments.	The Applicant notes your response	No
Mon_054_514_010623	S42/S44	Email	Volume 7, Annex 17.1 Flood Consequences Assessment NRW (A)advise reference to climate change should be included in the bullet points in Section 1.2.1.12Flood Map for Planning.	Noted, clarity has been provided in Volume 7, Annex 2.1: Flood Consequences Assessment of the Environmental Statement.	No
Mon_054_515_010623	S42/S44	Email	With reference to Section 1.2.3.1 Climate change, it is noted that the paragraph states- "a lifetime of 75 years is assumed for non-residential developments".	The Applicant notes your response	No
Mon_054_516_010623	S42/S44	Email	With reference to Sections1.3 and1.4Onshore substation Area Flood Risk Assessment Option 2 and Option 7, NRW (A) are satisfied with these sections; however, Denbighshire County Council as the LLFA/SAB should have the opportunity to provide comment on this section due to their statutory roles.	Conwy County Borough Council and Denbighshire County Council were given the opportunity to comment on the Flood Consequences Assessment as part of the statutory consultation	No
Mon_054_517_010623	S42/S44	Email	Figure 1.3Location of flood defences at Landfall, does not show the location of the Conwy County Borough Council (CCBC) maintained defences.	Noted, the mapping in Volume 7, Annex 2.1: Flood Consequences Assessment of the Environmental Statement has been updated	No
Mon_054_518_010623	S42/S44	Email	With reference to Section 1.5.4.16 Flood mitigation measures, NRW (A) support and recommend that stockpiled material and construction compounds be located outside of the floodplain.	The Applicant notes your response. Stockpiles and temporary construction compounds associated with the Mona Offshore Wind Project will not be located within the floodplain.	No
Mon_054_519_010623	S42/S44	Email	Confirmation should be sought from CCBC that they have adopted Land Drainage (Wales) Byelaws to determine if consent would be required for any works within 8m of an ordinary watercourse.	Noted, this was discussed in the Hydrology and Flood Risk Expert Working Group meeting on 7 June 2023 with Conwy County Borough Council and Denbighshire County Council. Conwy County Borough Council confirmed they have adopted bylaws.	No
Mon_054_520_010623	S42/S44	Email	NRW (A)can confirm that we are generally satisfied with the Annex 17.1 Flood Consequences Assessment document.	The Applicant notes your response	No
Mon_054_521_010623	S42/S44	Email	Volume 7, Annex 17.2 Surface Watercourses and NRW flood zones With reference to the Glossary, Flood Zone 3b is not applicable in Wales.	Noted, the glossary in Volume 7, Annex 2.2: Surface watercourses and NRW flood zones of the Environmental Statement has been updated	No
Mon_054_522_010623	S42/S44	Email	It is unclear what Figures 1.3 –1.7 Surface watercourses and NRW Flood Zones, are showing–further clarity is sought on the key/legend regarding the Flood Zone and data source –is it from the FMfP or FRAW?	Noted, mapping in Volume 7, Annex 2.2: Surface watercourses and NRW flood zones of the Environmental Statement has been updated.	No
Mon_055_001_010623	S42/S44	Email	APPRAISAL Firstly, it appears the application does not propose to connect to the public sewerage system or potable water network, and therefore Dwr Cymru Welsh Water has no objections in principle. However, should circumstances	The Applicant notes your response	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Formal response	Project change (directly or indirectly as a result of feedback)
			change and a connection to the public sewerage system/potable water network is preferred we must be re-consulted on this application.		
Mon_055_002_010623	S42/S44	Email	As part of the development falls within Wales, as of 7th January 2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. It is therefore recommended that the developer engage in consultation with the Denbighshire Council, as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features. Please note, Dwr Cymru Welsh Water is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation.		No
Mon_075_002_020623	S44	Email	Dear Sirs, I would like to contribute towards the statutory consultation process on behalf of REDACT and REDACT and REDACT relating to land covered by Works 18 and circled blue on the plan below (refer to response). This land has a very difficult topography and nature which cause it to severely hold water. To counter this the land has recently benefited from a drainage scheme that has cost almost £12,000 and the drainage now works very well indeed. The installation of cables will severely interfere with this and seriously impair the land. Notwithstanding this, it is the family's view that this land is not suitable for the route of this cable because there have been approaches for other alternative leisure and commercial uses on the land that the cable routes will sterilise and prevent happening which is contrary to the landowner's wishes. Further, the land is especially unsuitable for use as a temporary working area or compound and haul road due to the long term damage that this will inevitably do to the land in terms of compaction and soil strata mixing and further drainage issues. Please locate both pipes and works 18 compound elsewhere.		No
Mon_084_001_010623	S44	Email	Dear Sirs , We are appointed as Agents to represent our above mentioned client whom farms land at REDACTED. Our client strongly objects to the proposal for the onshore substation ('Option 7') to be located within works area 17 (as referred to on page 38 of the attached draft DCO and shown on Sheet 18 of the Works plans-: Example RPS report template (enbw-bp-consultation.s3.eu-west-2.amazonaws.com)) as it will -: 1. leave REDACTED homestead without access via the principal driveway (as the entrance off REDACTED road is no longer considered safe to use) 2. significantly reduce the farmable area which is vital for grazing and forage production for our client's dairy herd. 3. result in the slurry compound not being available which is salient for the storage of organic manure for nutrient distribution on the agricultural unit to promote pasture production . Significant investment has been made to the subject land ,over many years, to enhance its productive capacity and the loss of the agricultural parcel will	The Mona Onshore Development Area has been refined following the Preliminary Environmental Information Report (as documented in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement). Option 7 has been removed from the Mona Onshore Development Area and will no longer be impacted by the Mona Offshore Wind Farm.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Formal response	Project change (directly or indirectly as a result of feedback)
			have a considerable adverse impact on our clients farming enterprise (with the opportunity to secure conveniently located parcels of appropriate quality and characteristics ,required for dairy production , in the near locality being very scarce, rendering such a sizeable block irreplaceable).		
Mon_015_008_160623	S42/S44	Email	Private water supplies Chapter 16 confirms they will be undertaking a more detailed study of private water supplies through undertaking appropriate risk assessment. The Principal Environment Officer would look to be consulted on the mapping and identification of those supplies to ensure that there is no impact from the proposed development and if required a plan to protect those supplies identified.	The Principal Environmental Officer has been consulted and data was provided	No
Mon_146_004_260523	S47	Feedback form	The area around Moelfre Isaf is a water catchment supply many wells and springs.	The Onshore Cable Corridor has been refined following the statutory consultation: options along the corridor have been deselected and the width of the corridor has been reduced. Alongside this refinement, an assessment of the potential impacts on private groundwater supplies as a result of the Mona Offshore Wind Project has been included in Volume 7, Annex 1.2: Groundwater sources of supply - hydrogeological risk assessment of the Environmental Statement. Where impacts are may occur, appropriate mitigation measures have been identified.	No
Mon_146_005_260523	S47	Feedback form	Our water supply is adjacent to your proposed route. It supplies all our water for 2 households and 7 fields.	The Onshore Cable Corridor has been refined following the statutory consultation: options along the corridor have been deselected and the width of the corridor has been reduced. Alongside this refinement, an assessment of the potential impacts on private groundwater supplies as a result of the Mona Offshore Wind Project has been included in Volume 7, Annex 1.2: Groundwater sources of supply - hydrogeological risk assessment of the Environmental Statement. Where impacts are may occur, appropriate mitigation measures have been identified.	No
Mon_164_010_040623	S44	Feedback form	We are already subject to flooding at Nant Meiford, and two of the proposed routes could worsen this.	Flood risk has been considered in Volume 7, Annex 2.1: Flood Consequences Assessment of the Environmental Statement. Measures to control flood risk during construction are set out in the Outline Construction Surface Water and Drainage Management Plan (Document Reference J26.6).	No

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D.25.18 Onshore ecology table of responses



Table D.25. 18: Onshore ecology table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_054_013_010623	S42/S44	Email	Designates Sites: NRW (A) have no significant issues with the PEIR. We provide some advice and comments on certain details.	The Applicant notes your response	No
Mon_054_015_010623	S42/S44	Email	Protected Species: NRW (A) provide advice on further information and assessment required, and on appropriate mitigation.	The Applicant notes your response	No
Mon_054_450_010623	S42/S44	Email	Volume 1 Chapter 3, Project Description With regard to the watercourse crossings in Section 3.7.2.27, any trenched/open cut crossing would require mitigation for any fish species in the vicinity. These crossings would need assessing as to whether fish rescue will be required prior to drying out the works area.	An assessment of the baseline fish status of each watercourse crossed by the Mona Onshore Development Area has been undertaken and presented in Volume 7, Annex 3.15: Fish and eel survey technical report of the Environmental Statement. There will be no requirement for fish rescue as the watercourses traversed have limited fisheries resource or trenchless construction techniques will be used at watercourses where European Eel are present.	No
Mon_054_451_010623	S42/S44	Email	Volume 3, Chapter 18 Onshore Ecology With reference to Sections 18.8.2.18 –19, there will be a need for fish rescue and removal at sites that require dewatering and realignment, particularly for species such as eel. NRW (A) are in agreement with the proposed mitigation provided sensitive working methods are adhered to.	An assessment of the baseline fish status of each watercourse crossed by the Mona Onshore Development Area has been undertaken and presented in Volume 7, Annex 3.15: Fish and eel survey technical report of the Environmental Statement. There will be no requirement for fish rescue as the watercourses traversed have limited fisheries resource or trenchless construction techniques will be used at watercourses where European Eel are present.	No
Mon_054_452_010623	S42/S44	Email	Volume 7, Annex 18.1 Terrestrial Ecology Desk Study With reference to Section 2.4.1.1, European Eel are present on the IUCN Red List. It is likely that Eels will be encountered on the water course crossings and therefore, a screening assessment and any applicable avoidance/mitigation should be outlined. Furthermore, NRW (A)note that there is no data for fish within this section. Clarification is sought as to whether studies have been undertaken or surveys completed as we advise there is likely to be Eels and trout present. NRW (A)advise that surveys of crossing points should be undertaken prior to works commencing. We may be able to assist by providing further details of these watercourses.	Any assessment of the baseline fish status of each watercourse crossed by the Mona Onshore Development Area has been undertaken and presented in Volume 7, Annex 3.15: Fish and eel survey technical report of the Environmental Statement. Eel were electrofished in two watercourses which will be crossed by trenchless construction techniques.	No
Mon_054_459_010623	S42/S44	Email	Designated Sites Volume 3, Chapter 18 Onshore Ecology NRW (A) note and concur with the identification of designated sites Section 18.4.2.	The Applicant notes your response	No
Mon_054_460_010623	S42/S44	Email	NRW (A) note in Paragraph 18.4.4 that the baseline environment and two statutory sites "lie partially within the Mona Proposed Onshore Development Area. These are Llanddulas Limestone and Gwrych Castle Wood Site of Special Scientific Interest (SSSI), and Traeth Pensarn SSSI".	The likely significant effects of the Mona Offshore Wind Project on internationally, nationally and locally designated sites for nature conservation has been considered in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement. This includes Llanddulas Limestone and Gwrych Castle Wood SSSI and Traeth Pensarn SSSI, which are located within the Mona Onshore Development Area. The Mona Offshore Wind Project has committed to the use of trenchless techniques to avoid direct impacts to Llanddulas Limestone and Gwrych Castle Wood SSSI and Traeth Pensarn SSSI.	Yes
Mon_054_461_010623	S42/S44	Email	With reference to Table 18.12 Important Ecological Features, NRW (A) note the commitment that the buffer extent for the Mona Onshore Development Area will be agreed with the Onshore Ecology Expert Working Group (EWG).	The study and surveys areas adopted for onshore ecology baseline characterisation were presented at several stages in the DCO application process, including onshore ecology sections of the Scoping Report and Preliminary Environmental Information Report (PEIR) for the Mona Offshore Wind Project. In addition, the study and survey areas to be used to inform Volume 3, Chapter 3: Onshore ecology of the Environmental Statement have also been discussed and agreed (where possible) as part of regular Expert Working Group meetings between the Mona Offshore Wind Project and relevant stakeholders, including NRW prior to submission of the DCO application.	





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_054_462_010623	S42/S44	Email	With reference to Section 18.8 and Table 18.20 Measures adopted as part of the Mona Offshore Wind Project, NRW (A) note the design is for an avoidance of impact to sensitive ecological receptors and when this is not possible there is a commitment to undertake HDD under the Traeth Pensarn SSSI and Llanddulas Limestone and Gwrych Castle Wood SSSI. NRW (A) will continue to provide advice through the Onshore Ecology EWG once refinement of the route has taken place.	With respect to onshore ecology, the measures adopted as part of the Mona Offshore Wind Project are provided in section 3.8 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement. This includes the commitment to use trenchless techniques to avoid direct impacts to Llanddulas Limestone and Gwrych Castle Wood SSSI and Traeth Pensarn SSSI.	Yes
Mon_054_463_010623	S42/S44	Email	Controlled Water Pollution Prevention Volume 3, Chapter 18 Onshore Ecology From the information provided in Table 18.20 Measures adopted as part of the Mona Offshore Wind Project, NRW (A) note that the Code of Construction Practice (CoCP) is a live document and will be updated as the works commence. The generic details for the pollution prevention measures are suitable to be protective, but more specific details may be required once all the surveys are completed, and the final cable route is set. There is reference made to Control of water pollution from construction sites. Guidance for consultants and contractors (C532D) which is a Construction Industry Research and Information Association (CIRIA) document. A copy of this guidance should be made available for comment. NRW (A) also advise that Guidance for Pollution Prevention 5: Works and maintenance in or near water, and Pollution Prevention Guidelines 6: Working at construction and demolition sites, which are available on the NetRegs website should also be followed.	With respect to onshore ecology, the measures adopted as part of the Mona Offshore Wind Project are provided in section 3.8 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement. This includes the Outline Code of Construction Practice (document reference: J.26), which sets out best practice methods for pollution prevention measures during construction of the Mona Offshore Wind Project.	Yes
Mon_054_464_010623	S42/S44	Email	Protected Species Volume 3, Chapter 18 Onshore Ecology There is no consideration of or reference to EC guidance Commission notice Guidance document on the strict protection of animal species of Community interest under the Habitats Directive C/2021/7301 final in Section 18.2 Policy context.	Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System (ODPM 06/2005, Defra 01/2005) has been considered in the drafting of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement	No
Mon_054_465_010623	S42/S44	Email	Table 18.7 Summary of key consultation issues raised during consultation activities undertaken for the Mona Offshore Wind Project relevant to onshore ecology, should reference Great Crested Newts (GCN) survey and assessment –Volume 7 Annex 18.1.	A description of consultation undertaken to date between the Mona Offshore Wind Project and relevant consultees is provided in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement and the Consultation Report (document reference: 3.9), including discussions regarding the scope and methodology of Great Crested Newt surveys and subsequent assessment.	No
Mon_054_466_010623	S42/S44	Email	With reference to Table 18.9 Summary of site survey reports, GCN Surveys including Habitat Suitability Index (HSI) and eDNA are noted, but the limitations of an eDNA and HSI only approach may need to be referenced/considered.	The limitations of Great Crested Newt surveys are acknowledged in Volume 7, Annex 3.3: Great Crested Newt Survey technical report of the Environmental Statement. The methodology and identified limitations of all onshore ecology surveys have discussed as part of regular Expert Working Group meetings between the Mona Offshore Wind Project and relevant stakeholders, including NRW prior to submission of the DCO application.	No
Mon_054_467_010623	S42/S44	Email	With reference to Section 18.4.6.5 Hierarchical approach to assessment, this approach is not necessarily applicable when assessing current conservation status (CCS) and favourable conservation status (FCS). Note provisions of EC guidance. No apparent consideration of CCS and FCS –see Part 3 of EC Guidance Note C (2021) 7301.	Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System (ODPM 06/2005, Defra 01/2005) has been considered in the drafting of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement	No
Mon_054_468_010623	S42/S44	Email	The text in Section 18.4.6.9requires amendment where it states, "For European protected species there is a requirement that the scheme should not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range." NRW (A)advise that, in order to ensure compliance with Habitats and Species Directive requirements, the wording is revised to a requirement that the scheme demonstrates no detriment to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.	Environmental Statement and supporting documentation has been updated, where required.	No





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Mon_054_469_010623	S42/S44	Email	In Table 18.16 Definition of conservation importance of the receptor, NRW (A) query why all schedule1 species are listed as "high" but other legally protected species are listed as "medium". We advise that reference should be made to: Habitats Directive Annex I habitats. • Habitats Directive Annex II and IV species • Birds Directive Annex I species	Text within Volume 3, Chapter 3: Onshore ecology of the Environmental Statement and supporting documentation has been updated, where required.	No
Mon_054_470_010623	S42/S44	Email	With reference to Table 18.20 Measures adopted as part of the Mona Offshore Wind Project, NRW (A) note the comment with reference to GCN protected species licence. NRW (A) also advise that provision of temporary hedgerows surveillance and assessments are required to inform the detail of the proposed mitigation including associated dark (unlit) corridors. NRW (A) further advise, regarding provision of an 8 m easement between banks of any water course and any proposed development, that the buffer may need to increase if (a) water vole places of shelter are present; and (b) otter breeding sites/resting places are present	With respect to onshore ecology, the measures adopted as part of the Mona Offshore Wind Project have been reviewed and are provided in section 3.8 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement.	No
Mon_054_471_010623	S42/S44	Email	NRW (A) note the loss of terrestrial habitat in Sections 18.8.2.49 -18.8.2.54 Great crested newt—and advise that there would also be a loss of connectivity predicted. In Section 18.8.2.49, NRW (A) agree that the impact is predicted to be low, provided that: • Long term habitat compensation is a material component of the provisions of an appropriate scheme (this includes the tenure of the dedicated GCN compensation area according with the definition of a "responsible" body under part 7 of the Environment act 2021. • Measures (e.g., commuted sums) are used for the purposes of addressing temporary impacts (habitat loss and severance).	With respect to onshore ecology, the likely significant effects of the Mona Offshore Wind Project have been considered in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement. Measures adopted as part of the Mona Offshore Wind Project are provided in section 3.8 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement. This includes Appendix 1: Great Crested Newt Mitigation Strategy of the Outline Landscape and Ecology Management Plan (document reference: J.22).	No
Mon_054_472_010623	S42/S44	Email	NRW (A) note the impacts on GCN during commissioning and decommissioning in Sections 18.8.3.66 –18.8.3.75. We agree with the projected impacts but note potential implications of the presence of GCN in Sustainable Drainage Systems (SuDS)/water attenuation ponds.	With respect to onshore ecology, the likely significant effects of the Mona Offshore Wind Project have been considered in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement. Measures adopted as part of the Mona Offshore Wind Project are provided in section 3.8 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement. This includes Appendix 1: Great Crested Newt Mitigation Strategy of the Outline Landscape and Ecology Management Plan (document reference: J.22).	No
Mon_054_473_010623	S42/S44	Email	NRW (A) note the impacts during construction and operation, and reference to European Protected Species (EPS) licensing in Sections 18.8.4.39 –45. We agree with the principles of the conclusions. However, further detail is required to confirm the approach in respect of the long-term. Note the long-term is an attribute of conservation status.	With respect to onshore ecology, the likely significant effects of the Mona Offshore Wind Project have been considered in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement. Measures adopted as part of the Mona Offshore Wind Project, including requirements for relevant NRW European Protected Species Mitigation Licenses are described in Section 3.8 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement.	No
Mon_054_474_010623	S42/S44	Email	NRW (A) note the outline proposals for future monitoring in Section 18.8.7 Future monitoring. We advise that a monitoring plan will be required and subsequently approved so that it can effectively inform the Hydrological, Ecological and Landscape Management Plan (HELMP). Required component provisions of the Monitoring plan include (but are not limited to): • Identification of ecological features • Confirmation of surveillance and monitoring key performance indicators • Surveillance and monitoring methodologies • Licensing requirements • Persons responsible for commissioning and undertaking surveillance • Reporting requirements including uploading of data to relevant data bases, e.g., to the relevant local records centre; in respect of GCN the Wales GCN Monitoring scheme • Remedial measures that are capable of being actioned in the event of a failure to commission/undertake surveillance	Measures adopted as part of the Mona Offshore Wind Project, are described in Section 3.8 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement, and includes the Outline Landscape and Ecology Management Plan (document reference: J.22), which sets out the future monitoring requirements for existing and newly created habitats within the Mona Onshore Development Area.	Yes





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Mon_054_475_010623	S42/S44	Email	NRW (A) note the monitoring commitments outlined in Table 18.22 Monitoring commitments and advise that the GCN data should be uploaded into the Wales GCN Monitoring scheme.	Measures adopted as part of the Mona Offshore Wind Project are provided in section 3.8 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement. This includes the commitment to upload survey findings and monitoring data to the relevant ecology data bases (where appropriate).	Yes
Mon_054_476_010623	S42/S44	Email	With regard to Section 18.9 Cumulative effect assessment methodology, NRW (A) advise consideration of solar farm proposals.	Other plans/ projects considered as part of the assessment of cumulative effects are set out in Volume 5, Chapter 5.1: Cumulative effects screening matrix. With respect to onshore ecology, the assessment of cumulative effects between the Mona Offshore Wind Project and other plans/projects are described in Section 3.11 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement.	No
Mon_054_477_010623	S42/S44	Email	With reference to Sections 18.10.2.30 –34, regarding the cumulative impact with the Awel y Môr Wind Farm, the GCN assessment does not appear to have considered the provision of a dedicated long-term GCN mitigation area.	Other plans/ projects considered as part of the assessment of cumulative effects are set out in Volume 5, Chapter 5.1: Cumulative effects screening matrix. With respect to onshore ecology, the assessment of cumulative effects between the Mona Offshore Wind Project and other plans/projects are described in Section 3.11 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement. This includes consideration of mitigation areas associated with other previously consented projects within the vicinity of the Mona Onshore Substation.	Yes
Mon_054_478_010623	S42/S44	Email	In Section 18.12.1.3 Next Steps, the proposed approach to 2023 GCN abundance surveys is noted.	The Applicant notes your response.	No
Mon_054_479_010623	S42/S44	Email	In Section 18.12.1.4 Next Steps, Bat foraging dispersal surveys do not appear to have been considered. Although the approach may not be directly transferable, NRW (A) advise that surveys being undertaken to inform the HyNet scheme should be considered.	The survey methodologies for Habitat Suitability used for the Hynet DCO application have been reviewed and applied to onshore ecology surveys for the Mona Offshore Wind Project and is reported in Volume 7, Annex 3.10: Bat activity survey technical report of the Environmental Statement.	No
Mon_054_480_010623	S42/S44	Email	In Section 18.12.1.5 Next Steps, NRW (A) note the proposals for further surveys for a number of protected species including GCN, bats, dormice, water vole and otter.	Results of the further ecological surveys undertaken between PEIR and the submission of the application are presented in Volume 7, Annexes 3.1 to 3.15 of the Environmental Statement.	No
Mon_054_481_010623	S42/S44	Email	Volume 7, Annex 18.3 Great Crested Newt Interim Technical Report With reference to Section 1.1.1.6 Legislation, please note that EPS including GCN are subject to legal protection under the Wildlife and Countryside Act 1981 (as amended) under the provisions of Sections 9 (4) (b) and 9 (4) (c) only.	All legislation relevant to the assessment of onshore ecology for the Mona Offshore Wind Project are set out in Section 3.2 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement, which includes the Wildlife and Countryside Act 1981. In addition, legislation considered for the purposes of the Great Crested Newt surveys are provided in Volume 7, Annex 3.3: Great Crested Newt survey technical report of the environmental Statement.	No
Mon_054_482_010623	S42/S44	Email	References to dispersal are cited in Section 1.3.1.1 Survey areas. In our view citing of references such as Cresswell and Whitworth (2004) are not applicable for high pond density landscapes/sites where large GCN populations have been recorded. Given the inclusion of this reference, NRW (A)advise that the following additional references are also cited in respect of dispersal distances: • Haubrock, P.J. and Altrichter, J. (2016). Northern crested newt (Triturus cristatus) migration in a	GCN dispersal distances have been considered for the assessment of impacts of the Mona Offshore Wind Project, as set out in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement. References to Cresswell and Whitworth have been removed and replaced where appropriate.	No
			Nature Reserve: Multiple Incidents of Breeding Season Displacements Exceeding 1km. The Herpetological Bulletin 138: 31-33		
			• Bernhard, T., Driver, D., Dyer, S., Edgar, P., Ellis, M., Foster, J., Howe, E., McKinnell, J., and Raynor, R. (2022). Guidelines for the Selection of Biological SSSIs. Part 2: Detailed Guidelines for Habitats and Species Groups. Chapter 18 Reptiles and Amphibians. Joint Nature Conservation Committee, Peterborough.		





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Mon_054_483_010623	S42/S44	Email	In Section 1.4.2.6 HSI assessment, NRW (A) note that the Habitat Suitability Index (HSI) methodology is not particularly suitable for water features that primarily function for foraging or resting purposes (as opposed to breeding).	Response has been noted. Further information regarding the survey methodologies used for Great Crested Newt surveys is provided in Volume 7, Annex 3.3: Great Crested Newt survey technical report of the Environmental Statement.	No
Mon_054_484_010623	S42/S44	Email	In Section 1.6.1.1 Desk study, NRW (A) note that "A summary of the more recent records are shown in Figure 1.2 to Figure 1.5, which includes records reported since 2010, with a six-figure grid reference or higher, since lower resolutions do not allow accurate calculation of distance from the boundary of the Mona Proposed Onshore Development Area" but would question why 2010? We advise that owing to the longevity of the species and detectability and behaviour of the species all extant data is used. This includes data from other schemes e.g., Awel y Môr.	Baseline data sources used to inform the desk-based assessment for Great Crested Newts are set out in Section 3.4 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement and Volume 7, Annex 3.3 Great Crested Newt survey technical report of the Environmental Statement. These include desktop reports produced in relation to other nearby projects, such as Awel y Môr Offshore Wind Farm and St Asaph Solar Farm.	No
Mon_054_485_010623	S42/S44	Email	The results in Section1.6.2HSI assessment are noted. Are there any extant records for these ponds?	Baseline data sources used to inform the desk-based assessment for Great Crested Newts are set out in Section 3.4 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement and Volume 7, Annex 3.3 Great Crested Newt survey technical report of the Environmental Statement. These include desktop reports produced in relation to other nearby projects, such as Awel y Môr Offshore Wind Farm and St Asaph Solar Farm.	No
Mon_054_486_010623	S42/S44	Email	The results in Section 1.6.3 eDNA analysis are noted.	Full eDNA survey results are provided in Volume 7, Annex 3.3 Great Crested Newt survey technical report of the Environmental Statement.	No
Mon_054_487_010623	S42/S44	Email	With reference to Section 1.7 Summary and Conclusion, inclusion of extant data including St Asaph Business Park and Awel y Môr data is required. NRW (A) note reference to low water levels in 2022. In our view this is also applicable to 2023.	Baseline data sources used to inform the desk-based assessment for Great Crested Newts are set out in Section 3.4 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement and Volume 7, Annex 3.3 Great Crested Newt survey technical report of the Environmental Statement. These include desktop reports produced in relation to other nearby projects, such as Awel y Môr Offshore Wind Farm and St Asaph Solar Farm.	No
Mon_054_501_010623	S42/S44	Email	With reference to Section 18.8.2.29 & 21, 22, 23 – all watercourses have a high vulnerability to hydro-morphological impact too.	Noted - Each of the watercourses traversed by the Mona Onshore Development Area have been surveyed for otter, aquatic invertebrates, fish and eels. A note of the condition of each channel has been made and the hydromorphological sensitivity of the watercourse is low with most being ephemeral watercourses or dry ditches. This information has been used in the assessment and is reported in Volume 7, Annex 2.4: Water Framework Directive Surface Water and Groundwater Assessment.	No
Mon_054_502_010623	S42/S44	Email	In light of the above, the magnitude of the impact in Paragraph 18.8.2.30 needs to be reassessed (by a Geomorphologist).	Noted - Each of the watercourses traversed by the Mona Onshore Development Area have been surveyed for otter, aquatic invertebrates, fish and eels. A note of the condition of each channel has been made; the hydromorphological sensitivity of the watercourse is reported to be low with most being ephemeral watercourses or dry ditches. This information has been used in the assessment and is reported in Volume 7, Annex 2.4: Water Framework Directive Surface Water and Groundwater Assessment.	No

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Mon_054_503_010623	S42/S44	Email	Similarly, Sections 18.8.3.31 to 18.8.3.43 Hedgerows, should also be reconsidered in light of the above (by a Geomorphologist). More details of the geomorphological impacts associated with the proposals should be provided and suitable expertise sought.	Noted - Each of the watercourses traversed by the Mona Onshore Development Area have been surveyed for otter, aquatic invertebrates, fish and eels. A note of the condition of each channel has been made and the hydromorphological sensitivity of the watercourse is reported to be low with most being ephemeral watercourses or dry ditches. This information has been used in the assessment and is reported in Volume 7, Annex 2.4: Water Framework Directive Surface Water and Groundwater Assessment.	No
Mon_065_001_020623	S44	Email	Objection –potential impact to ancient woods and trees	The Mona Onshore Development Area has been refined following the statutory consultation, impacts to ancient woodland and veteran trees have been avoided where possible. Where this has not been possible (for example at Llandduals Limestone and Gwrych Castle Wood) the project has committed to using trenchless techniques to avoid impacts (as set out in Volume 5, Annex 4.3: Onshore Crossing Schedule of the Environmental Statement). Further details including assessment of impacts and proposed mitigation are detailed in Volume 3: Chapter 3 Onshore Ecology and Volume 3, Chapter 6 Landscape and Visual Resources of the Environmental Statement.	No
Mon_065_002_020623	S44	Email	As the UK's leading woodland conservation charity, the Woodland Trust aims to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering over 30,000 hectares and we have over 500,000 members and supporters. We are an evidence-led organisation, using existing policy and our conservation and planning expertise to assess the impacts of development on ancient woodland and ancient and veteran trees. Planning responses submitted by the Trust are based on a review of the information provided as part of the consultation.	The Applicant notes your response	No
Mon_065_003_020623	S44	Email	The Trust holds concerns regarding the proposed route alignment corridor on the basis of potential deterioration and detrimental impact to a number of ancient woods and trees. Please see the appended table at the bottom of the document (Annex 1) for the woods and trees in question.	The Mona Onshore Development Area has been refined following the statutory consultation and the majority of woodland blocks have now been avoided. Where this has not been possible (for example at Llandduals Limestone and Gwrych Castle Wood) the project has committed to using trenchless techniques to avoid impacts (as set out in Volume 5, Annex 4.3: Onshore Crossing Schedule of the Environmental Statement).	Yes
Mon_065_004_020623	S44	Email	Ancient Woodland Natural England and the Forestry Commission, the Government's respective bodies for the natural environment and protecting, expanding and promoting the sustainable management of woodlands, define ancient woodland as follows within their standing advice1: "Ancient woodland takes hundreds of years to establish and is defined as an irreplaceable habitat. It is a valuable natural asset important for: wildlife (which include rare and threatened species); soils; carbon capture and storage; contributing to the seed bank and genetic diversity; recreation, health and wellbeing; cultural, historical and landscape value. It has been wooded continuously since at least 1600AD. It includes: Ancient semi-natural woodland [ASNW] mainly made up of trees and shrubs native to the site, usually arising from natural regeneration. Plantations on ancient woodland sites –[PAWS] replanted with conifer or broadleaved trees that retain ancient woodland features, such as undisturbed soil, ground flora and fungi"	The Applicant notes your response	No

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Mon_065_008_020623	S44	Email	Natural Resources Wales's Ancient Woodland Inventory2 also places woodland into one of four categories:1hiips://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions2hiips://naturalresources.wales/guidance-and-advice/environmental-topics/woodland-management/woodlands-and-the-environment/ancient-woodland-inventory/?lang=en	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No
Mon_065_009_020623	S44	Email	Ancient Semi-Natural Woodland (ASNW) – broadleaf woodlands comprising mainly native tree and shrub species which are believed to have been in existence for over 400 years	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No
Mon_065_010_020623	S44	Email	Plantation on Ancient Woodland Sites (PAWS) – sites which are believed to have been continuously wooded for over 400 years and currently have a canopy cover of more than 50 percent non-native conifer tree species	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No
Mon_065_011_020623	S44	Email	Restored Ancient Woodland Sites (RAWS) – woodlands which are predominately broadleaf now and are believed to have been continually wooded for over 400 years. These woodlands will have gone through a phase when canopy cover was more than 50% non-native conifer tree species and now have a canopy cover of more than 50 percent broadleaf.	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No
Mon_065_012_020623	S44	Email	Ancient Woodland Site of Unknown Category (AWSU) – woodlands which may be ASNW, RAWS or PAWS. These areas are predominantly in transition and existing tree cover is described as 'shrubs', 'young trees', 'felled' or 'ground prepared for planting'.	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No
Mon_065_013_020623	S44	Email	All ancient woodlands come within the definition of priority woodland habitats listed in Section 7 of the Environment Act (Wales). The Environment Act places a duty on public authorities to seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales and take all reasonable steps to maintain and enhance those species and habitats as listed in Section 7.	The Applicant notes your response. In accordance with the Environment Act, opportunities have been taken to both mitigate and enhance the existing landscape: this includes areas of habitat creation. Further details are available in the Outline Landscape and Ecology Management Plan (Document Reference J22).	No
Mon_065_014_020623	S44	Email	Ancient Trees Natural England's standing advice on ancient trees states that they "can be individual trees or groups of trees within wood pastures, historic parkland, hedgerows, orchards, parks or other areas. They are often found outside ancient woodlands. They are also irreplaceable habitats. An ancient tree is exceptionally valuable. Attributes can include its: great age, size, condition, biodiversity value as a result of significant wood decay and the habitat created from the ageing process; cultural and heritage value."	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No
Mon_065_015_020623	S44	Email	Veteran Trees Natural England's standing advice on veteran trees states that they "can be individual trees or groups of trees within wood pastures, historic parkland, hedgerows, orchards, parks or other areas. They are often found outside ancient woodlands. They are also irreplaceable habitats. A veteran tree may not be very old, but it has significant decay features, such as branch death and hollowing. These features contribute to its exceptional biodiversity, cultural and heritage value." We consider that not all veteran trees are ancient, but all ancient trees are also veteran trees.	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No
Mon_065_016_020623	S44	Email	English Planning Policy Paragraph 5.3.14 of the Overarching National Policy Statement for Energy (EN-1) states: "Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The IPC should not grant development consent for any development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location outweigh the loss of the woodland habitat. Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons why."	The Applicant notes your response, (now para 5.4.14 to 15 of 2024 NPS) - A tree survey and AIA has been undertaken for the Mona Onshore Development Area and is presented in Volume 7, Annex 6.6 of the Environmental Statement. Ancient Woodland, veteran trees and their root protection areas (RPA) have been avoided by the direct impacts of the Onshore Cable Corridor and Onshore Substation. Tree RPAs will be clearly marked and fenced off during construction. Tree protection measures are also detailed in Volume 7, Annex 6.6 and the outline CoCP (Document Reference J26).	No
Mon_065_017_020623	S44	Email	The National Planning Policy Framework, paragraph 180, states: "When determining planning applications, local planning authorities should apply the following principles:	The Applicant notes your response - NPPF is English policy and does not apply in Wales	No





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Mon_065_018_020623	S44	Email	c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;"	The Applicant notes your response - NPPF is English policy and does not apply in Wales	No
Mon_065_019_020623	S44	Email	Welsh Planning Policy Welsh Government recognises that areas of ancient woodland are declining and becoming increasingly fragmented and emphasises the importance of conserving ancient woodland and its value as a biodiversity resource through the publication of Planning Policy Wales version 11 (2021) (PPW 11). In PPW 11, paragraph 6.4.26 states "Ancient woodland and semi-natural woodlands and individual ancient, veteran and heritage trees are irreplaceable natural resources, and have significant landscape, biodiversity and cultural value. Such trees and woodlands should be afforded protection from development which would result in their loss or deterioration unless there are significant and clearly defined public benefits; this protection should prevent potentially damaging operations and their unnecessary loss. In the case of a site recorded on the Ancient Woodland Inventory, authorities should consider the advice of NRW. Planning authorities should also have regard to the Ancient Tree Inventory."	Ancient Woodland, veteran trees and their root protection areas (RPA) have been avoided by the direct impacts of the Onshore Cable Corridor and Onshore Substation. Tree RPAs will be clearly marked and fenced off during construction.	No
Mon_065_020_020623	S44	Email	Impacts to Ancient Woodland; The proposed onshore cable has the potential to result in significant adverse impacts on ancient woodland through disturbance during construction of the pipeline, and potentially through indirect impacts where construction works occur within close proximity to these habitats. Five areas of ancient woodland are within the proposed corridor boundary, and numerous others are located within the wider work area, or adjacent to the corridor/work area boundaries. We are specifically concerned about the following impacts to the ancient woodlands within the route:	The Mona Onshore Development Area has been refined following the statutory consultation and the majority of woodland blocks have now been avoided. Where this has not been possible (for example at Llandduals Limestone and Gwrych Castle Wood) the project has committed to using trenchless techniques to avoid impacts (as set out in Volume 5, Annex 4.3: Onshore Crossing Schedule of the Environmental Statement).	
Mon_065_021_020623	S44	Email	Impact to ancient woodland from the installation of the proposed cabling. We understand that trenchless crossings are proposed for within the corridor route.	The Mona Onshore Development Area has been refined following the statutory consultation and the majority of woodland blocks have now been avoided. Where this has not been possible (for example at Llandduals Limestone and Gwrych Castle Wood) the project has committed to using trenchless techniques to avoid impacts (as set out in Volume 5, Annex 4.3: Onshore Crossing Schedule of the Environmental Statement).	
Mon_065_022_020623	S44	Email	Permanent fragmentation due to the removal of adjacent semi-natural habitats, such as small, wooded areas, hedgerows, individual trees and wetland habitats if continued access to the cable once constructed is required.	There will be limited permanent habitat fragmentation along the onshore cable corridor as following the construction of the onshore cable corridor habitat will be replaced, where possible. Access for operations and maintenance will utilise existing access to field. At the onshore substation, permanent habitat fragmentation will be mitigated for through woodland planting and hedgerow enhancement, further details are available in the Outline Landscape and Ecology Management Plan (Document Reference J22).	Yes
Mon_065_023_020623	S44	Email	Noise and dust pollution impact to woodlands within close proximity of the cable installation area.	Noise and dust impacts during construction will be minimised with the implementation of the Construction Noise and Vibration Management Plan and Dust Management Plan which form part of the CoCP (Document Reference J26).	Yes

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Mon_065_024_020623	S44	Email	Root damage to woodland boundary trees during installation of the cable.	Ancient Woodland and veteran trees have been avoided by the Mona Onshore Development Area. Retained trees, RPAs and buffer zones will be avoided as much as possible. Tree RPAs will be clearly marked and fenced off during construction. The operation and maintenance of the Mona onshore substation and cable corridor should not necessitate the removal or encroachment on any tree RPAs, that have been retained. In the unlikely event that work near a retained tree is required a method statement for that work would be agreed with the relevant tree officer Tree RPAs will be clearly marked and fenced off during construction. Further detail is available in the Outline CoCP (Document Reference J26).	Yes
Mon_065_025_020623	S44	Email	The potential for trampling of sensitive ancient woodland flora and soils if access is required within any ancient woodland.	The Mona Offshore Wind Project has sought to avoid areas of ancient woodland through site selection (Volume 1, Chapter 4: Site selection and the consideration of alternatives) and the use of trenchless techniques for crossings (Volume 5, Annex 4.3: Onshore Crossing Schedule of the Environmental Statement). Buffers for construction activity will be provided around sensitive habitats such as ancient woodland (Outline CoCP (Document Reference J26)). Access will not be required to areas of ancient woodland during the operations and maintenance phase of the project.	Yes
Mon_065_026_020623	S44	Email	Natural England and Forestry Commission have identified impacts of development on ancient woodland within their standing advice (please see annex 2 at the foot of this document for the full range of impacts outlined). This guidance should be considered Government's position with regards to development impacting ancient woodland, although Natural England and Forestry Commission should still be consulted for specific comment on this application.	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No
Mon_065_027_020623	S44	Email	In addition, Natural Resources Wales has published standing advice which outlines the potential impacts of development on ancient woodland and provides recommendations for their protection.	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No
Mon_065_028_020623	S44	Email	We would also recommend that any non-ancient woodlands affected by the scheme are reviewed to ensure any areas of potentially unmapped ancient woodland are accounted for as the scheme progresses. Surveys detailing their woodland flora and fauna alongside an assessment of historical mapping should be undertaken, to ensure impacts to all irreplaceable habitats are considered and mitigated for as part of the design process.	A tree survey and Arboriculture Impact Assessment (AIA) have been undertaken for the Mona Onshore Development Area, to the relevant guidelines and British Standards. They are presented in Volume 7, Annex 6.6: Tree survey and Arboriculture Impact Assessment of the Environmental Statement	No
Mon_065_029_020623	S44	Email	Mitigation for ancient woodland Detrimental edge effects have been shown to penetrate woodland causing changes in ancient woodland characteristics that extend up to three times the canopy height in from the forest edges. As such, it is necessary for mitigation to be considered to alleviate such impacts. Additional mitigation approaches are outlined in our Planners' Manual 4; these measures would help ensure that the development meets policy requirement and guidance and include:	Onshore Development Area. Retained trees, RPAs and buffer zones	Yes
Mon_065_030_020623	S44	Email	Non-invasive root investigation for ancient trees and protection beyond the limit of the usual investigative tools.	Ancient Woodland and veteran trees have been avoided by the Mona Onshore Development Area. Retained trees, RPAs and buffer zones will be avoided as much as possible. Tree RPAs will be clearly marked and fenced off during construction. The operation and maintenance of the Mona onshore substation and cable corridor should not necessitate the removal or encroachment on any tree RPAs, that have been retained.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_065_031_020623	S44	Email	Retaining and enhancing natural habitats around ancient woodland to improve connectivity with the surrounding landscape.	The Illustrative Landscape and Ecology Strategy Plan has been designed to retain and enhance habitats where possible and improve ecological connectivity to the wider landscape. The proposed mitigation is shown on the Illustrative Landscape and Ecology Strategy Plan within the Outline Landscape and Ecological Management Plan (Document Reference J22), and details of mitigation measures are included in the Outline CoCP (Document Reference J26).	Yes
Mon_065_032_020623	S44	Email	Measures to control noise, dust and other forms of water and airborne pollution.	Measures to minimise the impacts from noise, dust and water-borne pollution during construction are set out in the Outline Code of Construction Practice (Document Reference J26) and its appendices.	Yes
Mon_065_033_020623	S44	Email	Implementation of an appropriate monitoring plan to ensure that proposed measures are effective over the long term and accompanied by contingencies should any conservation objectives not be met.	The Outline Landscape and Ecological Management Plan (Document Reference J22) includes a monitoring plan for the proposed landscaping planting.	Yes
Mon_065_034_020623	S44	Email	Buffer zones Buffering ancient woodland can be an ideal mitigation measure as buffer zones can be used to establish distance between the development and habitat, which helps to alleviate harmful impacts, while also creating new areas of habitat around the ancient woodland. This development should allow for a buffer zone of at least 30metres to prevent adverse impacts such as pollution and disturbance and ensure avoidance of root damage. HERAS fencing fitted with acoustic and dust screening measures should be put in place during construction to ensure that the buffer zone does not suffer from encroachment of construction vehicles/stockpiles, and to limit the effects of other indirect impacts.	Ancient Woodland and veteran trees have been avoided by the Mona Onshore Development Area. Retained trees, RPAs and buffer zones will be avoided as much as possible. Tree RPAs will be clearly marked and fenced off during construction. The operation and maintenance of the Mona onshore substation and cable corridor should not necessitate the removal or encroachment on any tree RPAs, that have been retained.	Yes
Mon_065_035_020623	S44	Email	This is backed up by Natural England and Forestry Commission's standing advice which states that "the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic." Further information on buffer zones is outlined in the annex below.	A tree survey and AIA have been undertaken for the Mona Onshore Development Area, to the relevant guidelines and British Standards. They are presented in Volume 7, Annex 6.6 of the Environmental Statement. Ancient Woodland and veteran trees have been avoided by reducing the size of the Onshore Substation and the extent of the cable corridor and by choice of construction methodology. Tree RPAs will be avoided as much as possible by the Mona Onshore Development Area. Tree RPAs will be clearly marked and fenced off during construction. Dust impacts during construction will be managed through measures in the Dust Management Plan. The operation and maintenance of the Onshore Substation is unlikely to generate air pollution impacts.	No
Mon_065_036_020623	S44	Email	Natural Resources Wales's standing advice also outlines the following guidance on protection zones: "A stand-off or protection zone's purpose is to protect ancient woodland. The size and type of stand-off or protection zone should vary depending on the scale, type and impact of the development. The BS 5837 Tree Survey, PEA and/or EcIA assessments should be used to inform the stand-off or protection zone for each individual woodland and veteran and ancient trees. Some zones may only require a root protection area to prevent negative impacts on individual trees or groups of trees, and others are likely to extend further." 3Natural Resources Wales /Advice to planning authorities considering proposals affecting ancient woodland4hiips://www.woodlandtrust.org.uk/media/3731/planners-manual-for-ancient-woodland.pdf	They are presented in Volume 7, Annex 6.6 of the Environmental	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_065_037_020623	S44	Email	Trenchless crossings The Trust understands that the areas of ancient woodland within the corridor boundary are likely to be subject to a trenchless crossing in order to limit the removal of irreplaceable ancient woodland soils during construction. The Trust would primarily advocate for the redirection of any cabling through ancient woodland areas, however if such works are likely to occur should development consent be granted, then we would appreciate further clarification on the technique and any potential impacts posed.	Volume 5, Chapter 4.3: Onshore crossing schedule of the Environmental Statement outlines the proposed crossing methodologies for each obstacle along the onshore cable corridor, including areas of Ancient Woodland.	Yes
Mon_065_038_020623	S44	Email	Veteran trees We have identified a number of ancient and veteran trees within the proposed cabling corridor that are recorded on the Ancient Tree Inventory 5. The specific trees in question are outlined within the appended table at the bottom of the document. It is important that an arboricultural impact assessment is undertaken early within the design process, to ensure that ancient and veteran trees are identified and accounted for as the route is refined. This will ensure that appropriate protection can be incorporated into the scheme design.	A tree survey and Arboriculture Impact Assessment (AIA) have been undertaken for the Mona Onshore Development Area, to the relevant guidelines and British Standards. They are presented in Volume 7, Annex 6.6: Tree survey and Arboriculture Impact Assessment of the Environmental Statement	No
Mon_065_039_020623	S44	Email	It is essential that no ancient or veteran trees are lost as part of the development. The loss of any such trees can have a significant impact on local wildlife, particularly those which depend on the habitat provided by veteran trees. Any loss of veteran trees can also be highly deleterious where there is a wider population of veteran trees within close proximity, which may harbour rare and important species.	A tree survey and AIA have been undertaken for the Mona Onshore Development Area, to the relevant guidelines and British Standards. They are presented in Volume 7, Annex 6.6 of the Environmental Statement. Ancient Woodland and veteran trees have been avoided by reducing the size of the Onshore Substation and the extent of the cable corridor and by choice of construction methodology. Tree Root Protection Areas (RPA) have been avoided as much as possible by the Mona Onshore Development Area. Tree RPAs will be clearly marked and fenced off during construction. The operation and maintenance of the Onshore Substation and Onshore Cable Corridor should not necessitate the removal of trees or encroachment on any tree RPAs. These tree protection measures are also detailed in the outline CoCP (Document Reference J26).	No
Mon_065_040_020623	S44	Email	Trees are susceptible to change caused by construction/development activity. As outlined in 'BS5837:2012 -Trees in relation to design, demolition and construction' (the British Standard for ensuring development works in harmony with trees), construction work often exerts pressures on existing trees, as do changes in their immediate environment following construction of any new infrastructure. Root systems, stems and canopies, all need allowance for future movement and growth, and should be taken into account in all proposed works on the scheme through the incorporation of the measures outlined in the British Standard.	A tree survey and AIA have been undertaken for the Mona Onshore Development Area, to the relevant guidelines and British Standards. They are presented in Volume 7, Annex 6.6 of the Environmental Statement. Ancient Woodland and veteran trees have been avoided by reducing the size of the Onshore Substation and the extent of the cable corridor and by choice of construction methodology. Tree Root Protection Areas (RPA) have been avoided as much as possible by the Mona Onshore Development Area. Tree RPAs will be clearly marked and fenced off during construction. The operation and maintenance of the Onshore Substation and Onshore Cable Corridor should not necessitate the removal of trees or encroachment on any tree RPAs. These tree protection measures are also detailed in the outline CoCP (Document Reference J26).	No

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Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_065_041_020623	S44	Email	While BS5837 guidelines state that trees should have a root protection area (RPA) of 12 times the stem diameter (capped at 15m), this guidance does recognise that veteran trees need particular care to ensure adequate space is allowed for their long-term retention. It is imperative that Natural England and Forestry Commission's standing advice on root protection areas for veteran trees is taken into account in planning decisions.	A tree survey and AIA have been undertaken for the Mona Onshore Development Area, to the relevant guidelines and British Standards. They are presented in Volume 7, Annex 6.6 of the Environmental Statement. Ancient Woodland and veteran trees have been avoided by reducing the size of the Onshore Substation and the extent of the cable corridor and by choice of construction methodology. Tree Root Protection Areas (RPA) have been avoided as much as possible by the Mona Onshore Development Area. Veteran tree and Ancient Woodland buffer zones have also been respected by the infrastructure works. Tree RPAs will be clearly marked and fenced off during construction. Tree protection measures are also detailed in the outline CoCP (Document Reference J26).	Yes
Mon_065_042_020623	S44	Email	This advice states: "For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area. Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone."	A tree survey and AIA have been undertaken for the Mona Onshore Development Area, to the relevant guidelines and British Standards. They are presented in Volume 7, Annex 6.6 of the Environmental Statement. Ancient Woodland and veteran trees have been avoided by reducing the size of the Onshore Substation and the extent of the cable corridor and by choice of construction methodology. Tree Root Protection Areas (RPA) have been avoided as much as possible by the Mona Onshore Development Area. Tree RPAs will be clearly marked and fenced off during construction. These tree protection measures are also detailed in the outline CoCP (Document Reference J26).	Yes
Mon_065_043_020623	S44	Email	Conclusion Ancient woodland and veteran trees are irreplaceable habitats, once lost they are gone forever. Any development resulting in loss or deterioration of ancient woods and trees must consider all possible measures to ensure avoidance of adverse impact. We would appreciate the opportunity to discuss the proposals in more detail ahead of the next phase of design; if you would like to get in touch, our contact email is REDACTED.	The Woodland Trust attended an Onshore Ecology Expert Working Group to discuss the Illustrative Landscape and Ecology Plan for the Onshore Substation. The Applicant will continue to engage with The Woodland Trust through the Evidence Plan Process.	No
Mon_092_002_240423	S44	Phone	Has concerns about the removal of hedges, disturbing of animals including slow worms, and general environmental impacts of the project. He has been in touch with his councillor Martyn Hogg about this and he shares his concerns and will be responding to the consultation.	The applicant thanks the consultee for its detailed comments on the onshore ecology and recognises the importance of the queries raised. Detailed assessment of impacts and the Applicants approach to managing and mitigating any potential impacts tis provided in Volume 3, Chapter 3 Onshore Ecology of the Environmental Statement. The Applicant has undertaken ongoing conversations with this consultee via email and consultation events to aim to resolve outstanding queries.	
Mon_108_006_010623	S44	Feedback form	3. The decimation of the countryside will be catastrophic; fields, trees, hedgerows and major disruption to wildlife habitats.	Impacts to onshore ecology have been assessed in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement. This chapter includes details of the mitigation measures that will be put in place minimise the impacts to habitats and species within the Mona Onshore Development Area.	No

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Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_108_011_010623	S44	Feedback form	8. I was informed by one of the staff at the one of the meetings sites that outsize trees could not be planted and mature trees would be used and then had to grow to shield the site, I would be deceased before the screening is effective. I beg to differ and if you look on the Countrylife Website: Planting big trees: What you need to know you will find outsize trees can be planted successfully.	The effects on landscape character, visual effects and cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline Landscape and Ecological Management Plan (Document J22).	
Mon_002_016_080623	S42/S44	Email	VOLUME 1: CHAPTER 3 – PROJECT DESCRIPTION Section 3.7 – Onshore Infrastructure Hedgerow crossings - As open cut trenches are proposed to lay cables, it is also noted that extensive sections of hedgerow and trees are proposed to be removed. The Council has concerns with the extent of hedgerow that would be removed, and further assessment is needed to demonstrate why trenchless ducts cannot be utilised to lay cables under existing hedgerow and trees in order to minimise the loss of important and biodiverse trees and hedgerow.	The applicant has committed to crossing a number of the hedgerows using trenchless techniques as identified in Volume 5, Annex 4.3: Onshore Crossing Schedule of the Environmental Statement. Where open cut trenching will be used hedgerow removal will be minimised and trees avoided where possible. An assessment of the impacts to hedgerows is included in Volume 3, Chapter 3 Onshore Ecology of the Environmental Statement.	Yes
Mon_002_020_080623	S42/S44	Email	VOLUME 3: ONSHORE CHAPTERS Section 18 – Onshore Ecology The Council are general satisfied that the appropriate surveys and assessments have been undertaken, however it is essential that developer continues to engage with the Council' Ecology Officer and NRW on the development of necessary mitigation and compensation measures to ensure they are sufficient to offset identified significant and adverse effects.	The Applicant notes your response. DCC's ecology officer is a member of the Onshore Ecology Expert Working Group and has attended a number of Expert Working Group meetings throughout the pre-application stage.	No
Mon_002_021_080623	S42/S44	Email	The Council also wish to stress that, Planning Policy Wales (PPW 11) makes clear that "planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means that development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity" (Section 6.4.5). PPW also draws attention to the contents of Section 6 of the Environment (Wales) Act 2016, which sets a duty on Local Planning Authorities to demonstrate they have taken all reasonable steps to maintain and enhance biodiversity in the exercise of their functions. It is important that biodiversity and resilience considerations are taken into account at an early stage when considering development proposals (Section 6.4.4). In additional to mitigation and compensation measures, the proposal is also required to demonstrate a net biodiversity gain, and therefore enhancement measures should also be embedded into the development.	The Applicants proposals for achieving net biodiversity gain are outlined in the Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7)	No
Mon_002_022_080623	S42/S44	Email	As open cut trenches are proposed to lay cables, it is noted that extensive sections of hedgerow and trees are proposed to be removed. The Council has concerns with the extent of hedgerow that would be removed, and further assessment is needed to demonstrate why trenchless ducts cannot be utilised to lay cables under existing hedgerow and trees in order to minimise the loss of important and biodiverse trees and hedgerow.	The applicant has committed to crossing a number of the hedgerows using trenchless techniques as identified in Volume 5, Annex 4.3: Onshore Crossing Schedule of the Environmental Statement. Where open cut trenching will be used hedgerow removal will be minimised and trees avoided where possible. An assessment of the impacts to hedgerows is included in Volume 3, Chapter 3 Onshore Ecology of the Environmental Statement.	Yes
Mon_002_023_080623	S42/S44	Email	It is noted that the substation site would result in the direct loss of Great Crested Newt habitat. Any loss of habitat must be fully compensated for and the Council would defer to NRW with respect to impact on protected species.	An Illustrative Landscape and Ecology Strategy identifies the proposed areas of planting and GCN habitat creation. A GCN mitigation strategy has been prepared and forms part of the Outline Landscape and Ecological Management Plan (Document Reference J22). NRW and DCC have been consulted during the preparation of the mitigation strategy.	No

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Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_015_014_160623	S42/S44	Email	Trees and woodlands In order to determine the impact on trees, the Council would need full BS5837 'Trees in relation to design, demolition and constructions' reports. The reports should provide details for all trees affected and can include groups and woodlands as well as individual trees. The reports should consider all trees within the 'development' and all trees within influencing distance of it, including those on neighbouring properties.	A tree survey and Arboriculture Impact Assessment (AIA) have been undertaken for the Mona Onshore Development Area, to the relevant guidelines and British Standards. They are presented in Volume 7, Annex 6.6: Tree survey and Arboriculture Impact Assessment of the Environmental Statement. Ancient Woodland and veteran trees and their Root Protection Zones (RPZ) have been avoided by the Mona onshore development.	Yes
Mon_015_015_160623	S42/S44	Email	It would be useful to have tree/woodland management plans submitted as part of the application so we can see how the recovery is going to proceed and detailed replanting or mitigation planting plans with sizes, species, locations etc. provided together with location plans	Tree protection measures are detailed in the outline COCP (Document reference J26). An outline LEMP (Document reference J22) has been provided which includes details of hedgerow, woodland and tree planting.	No
Mon_015_020_160623	S42/S44	Email	The developer is also requested to give consideration to the provision of a management scheme (including funding) to enable the restoration of the vegetated shingle beach. This would mitigate any adverse effects of the project on the SSSI and could also provide habitat compensation and enhancement in relation to the development as a whole. The Council's Ecologist would be happy to provide further advice on this matter.	The Landfall will be constructed using trenchless techniques. Where support vehicles are required to access the beach, they will follow a dedicated route from the beach car park to MLWS. Vehicles will not be permitted to travel across the vegetated shingle beach associated with Traeth Pensarn SSSI. See the Outline Landfall Construction Method Statement (Document Reference J26.14). The Applicant will continue to engage with Conwy County Borough Council with regard to opportunities to enhancement the environment in line with the Biodiversity Benefit and Green Infrastructure Statement (Document Reference (J7).	Yes
Mon_122_007_080723	S42	Email	Bearing in mind that there is likely to be impact to both the marine and terrestrial habitats if this proposed development proceeds and considering both the environmental legislative framework of the Welsh and UK Governments, it is crucial that Net Biodiversity Gain considerations are incorporated into these proposals.	The Mona Offshore Wind Project's approach to providing net biodiversity benefit is set out in the Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7)	No
Mon_122_008_080723	S42	Email	On-going monitoring of the impact of this development on the marine and terrestrial environments is essential. We hope that these issues will be addressed by NRW, NE and JNCC in ongoing discussion.	The monitoring proposed by the Applicant is detailed in the technical chapters of the Environmental Statement (Volume 2, 3 and 4). The approach to monitoring of onshore receptors is set out in the Outline LEMP (Document J22). The approach to offshore monitoring is detailed in the Offshore In-principal Monitoring Plan (Document Reference J15). All monitoring proposed is presented in the Mitigation and Monitoring Schedule (Document Reference J10)	Yes
Mon_123_002_100723	S42	Email	The development could also be positive in providing employment in the green sector. We also appreciate the need for wide consultation, to minimize the impact of the development on the marine/ terrestrial environments and on local communities.	The Applicant notes your response and recommends reviewing the Socio-Economics chapter (Document reference F4.3) for information on employment, and the Chapters within Volume 2, 3 and 4 of the Environmental Statement for information on the applicant's proposals to minimise and mitigate against any potential effects on the marine and terrestrial environments.	No
Mon_149_008_260523	S47	Feedback form	Glascoed is known to be the habitat of great crested newts and various other birds and mammals in this area.	A Great Crested Newt Mitigation Strategy is included in the Outline Landscape and Ecological Management Plan (Document Reference J22). A full assessment of the impacts to onshore ecology can be found in Volume 3, Chapter 3 Onshore ecology of the Environmental Statement.	No





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Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_156_005_010623	S47	Feedback	The whole project MUST be abandoned because it is damaging to the Manx people, industries, and economy, plus ecology and marine life.	Impacts to marine ecology receptors and human receptors (e.g., shipping and navigation, commercial fisheries and socio-economics including the interaction with lifeline ferry services) have been fully assessed for all phases of the project, based on a maximum design scenario approach. Designated sites within the Isle of Man territorial waters, and their associated habitats and species, have been considered and documented in the assessment process. Seascape and visual impacts and impacts on designated heritage assets from the offshore infrastructure have also been considered. The assessment has engaged with stakeholders from the Isle of Man to ensure all relevant and available data has been included and is therefore based upon the best evidence to underpin the assessment of impacts. Most assessments have determined that there will be no significant effect from the Mona Offshore Wind Project. Where a significant effect has been identified, the Applicant has set out appropriate mitigation within the application. Detailed mitigation will be determined post-consent once the project parameters are fully refined and understood. Key stakeholders, including those on the Isle of Man, will be consulted to ensure the mitigation approach is suitable.	Yes
Mon_158_022_020623	S44	Feedback form	Wildlife will suffer through loss of natural habitat. Cefn Meiriadog has a rich diversity of wildlife, no only bats and Crested Newts (which are of course important), but deer, badgers, foxes, raptors including Red Kite to name but a few.	The impacts of the Mona Offshore Wind Project on onshore ecology are assessed in Volume 3, Chapter 3: Onshore ecology and Volume 3, Chapter 4 Onshore and intertidal ornithology of the Environmental Statement. The Outline CoCP includes management measures to protect ecological receptors during construction. Habitats for GCN, dormouse, bats and birds will be provided as shown on the illustrative landscape and ecology strategy and described in the Outline Landscape and Ecology Management Plan (Document reference J22).	No
Mon_164_011_040623	S44	Feedback form	This area is fortunate to have a diverse ecology, including many ancient trees. Inevitable construction of this extent will negatively impact this	A full assessment of impacts on onshore ecology is assessed in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement alongside details of the proposed mitigation measures that will be implemented to reduce the impacts. A tree survey and Arboriculture Impact Assessment (AIA) have also been undertaken for the Mona Onshore Development Area, to the relevant guidelines and British Standards. They are presented in Volume 7, Annex 6.6: Tree survey and Arboriculture Impact Assessment of the Environmental Statement.	No
Mon_167_001_190423	S47	Consult Online	Besides wind farms being unsightly and detrimental to wildlife. With insignificant benefits I say No No AND NO!!!	The Applicant notes your response. However, it believes the generation of renewable energy brings a range of benefits to its host communities such as job creation, supply chain opportunities, skills growth and the chance to contribute to the generation of renewable energy.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_189_002_020623	S47	Consult Online	I am worried that you are planning a substation in an area of outstanding beauty. You are going to destroy the stunning landscape which is populated by a large amount of wildlife.	The visual effects of the Mona Onshore Substation are assessed in section 6.11.2 of Volume 3, Chapter 6: Landscape and visual resources, of the environmental Statement. The Mona Onshore Substation does not lie within the Clwydian Range. The effects on views from the Clwydian Range and Dee Valley National Landscape are assessed in section 11.1 Volume 3, Chapter 6: Landscape and visual resources, of the environmental Statement. The effects of the whole project (onshore and offshore assets) on the special qualities of the National Landscape are in Volume 6, Annex 8.5: International and nationally designated landscapes, of the Environmental Statement.	No
Mon_196_003_010623	S44	FREEPOST	The decimation of the countryside will be catastrophic; fields, trees, hedgerows and major disruption to wildlife habitats.	A full assessment of impacts on onshore ecology is assessed in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement alongside details of the proposed mitigation measures that will be implemented to reduce the impacts.	No
Mon_196_008_010623	S44	FREEPOST	I was informed by one of the staff at the one of the meetings sites that outsize trees could not be planted and mature trees would be used and then had to grow to shield the site, I would be deceased before the screening is effective. I beg to differ and if you look on the Countrylife Website: Planting big tress: What you need to know you will find outsize trees can be planted successfully.	The effects on landscape character, visual effects and cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline Landscape and Ecological Management Plan (Document J22).	
Mon_197_020_190623	S44	FREEPOST	In relation to ecology, we have a vista of mature trees and hedges, the area, you will be developing for the substation is 125000m sq, (12:5 hectares / 31 acres) so there will be a lot of site clearance of mature trees, hedges and the wildlife they support, not to mention the loss of productive agricultural land, Vale of Clwyd, breadbasket of the region.	The Applicant thanks the consultee for their response and notes that onshore Substation Option 7 has been discounted following the statutory consultation.	Yes
Mon_208_005_040623	S44	Email	Area C This element of Work Area 8 includes an area to the West for the cable corridor with the remainder of the field included for all other works scheduled within the draft DCO. Loss of this field entire field for the period of construction would be significant to the farming enterprise. Any additional land outside the cable corridor should be minimised. The route of any haul road, temporary/permanent access routes or work compounds in this area are not shown. If these are required, they should be located to minimise any impact. No ecological mitigation is shown within Works Area 8. If this is required it needs to be discussed and agreed in advance of DCO application with the Owner. Any residual land rights acquired under compulsory acquisition powers will significantly affect the value of the Property.	Comments noted. Land outside of the cable corridor has been reduced where possible to take these comments into account. Access routes have been identified and Dalcour Maclaren on behalf of the applicant will continue to discuss the proposals with the landowner and the assessment of the land value.	No

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D.25.19 Historic Environment table of responses



Table D.25. 19: Historic environment table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_035_001_120523	S44	Email	With Grade II Star Plas Newydd in Cefn Meriadog being my family home the findings gave me great concern although I was very pleased to learn from you that Option 5 had in fact been eliminated even though it was highly irregular considering the circumstances. I have to say that there seemed to be no logic in the finding to put Option 5 on the short list. The comments completely contradicted the conclusion. Added to that, I am afraid to say the précis were also grammatically and spelling wise of a surprisingly low standard which all together gave one little confidence that a proper conclusion could ever be arrived at. That these reports still appeared live in print is even more astonishing and makes a mockery of the Consultation process. This is further disappointing as up till then I had a high opinion of the manner in which this consultation was being carried out following that by Scottish Power Manweb for the previous National Infrastructure Project in our area. How on earth was this allowed to come about? I sincerely trust that there will be explanations, repercussions for all those responsible and apologies for mislead consultees. Had trouble making direct contact via the information on the website. It was only through dealings with Dalcour Maclaren over environmental matters that I was able to contact yourself and actually talk to someone about the project for which I was relieved and grateful.	Thank you for your feedback. A detailed explanation of the site selection process for the onshore substation is included within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4); including a summary of the non-statutory and statutory consultation events that were held to inform the process. Potential impacts on Plas Newydd are assessed within Volume 3, Chapter 5: Historic Environment (Document Reference F3.5). In order to ensure the consultation information was available to as many people as possible, many different methods were used, including but not limited to a website, postcards, consultation brochure, deposit locations, webinar and inperson events (a full list of materials produced for the consultation can be found in the Consultation Report (Document Reference E.3)). The applicant aimed to ensure that it was clear how people could have their say, but also how to get in touch with the project team to find out more information. We're sorry to hear that you had trouble finding this information on the website.	
Mon_069_320_010623	S42	Email	Visual impact of proposals on the setting of protected monuments on the east side of the watershed of the Island. As with the Morgan development, this could involve approximately25 monuments. Whilst the impact could be considered limited, but there are some flagship sites such as Castle Rushen and Laxey Wheel which are major tourist assets of national and economic significance to the Island where the impact should be considered more holistically.	A setting assessment has been undertaken and is presented in Volume 7, Annex 5.7 Setting Assessment (offshore infrastructure).	No
Mon_073_001_010623	S42	Email	This advice is given in response to the Preliminary Environmental Information Report prepared for the Mona Offshore Wind Project.	Noted.	No
Mon_073_002_010623	S42	Email	Annex A provides a list of historic assets within the application area and within a 3km buffer for both offshore and onshore.	Noted.	No
Mon_073_005_010623	S42	Email	Onshore The assessment of the Historic Environment has been carried out, so far, following appropriate surveys. This has identified all designated historic assets and all recorded undesignated historic assets in the survey areas and has provided an initial consideration of the potential direct impact of the proposed cable run and onshore substation on them.	The Applicant notes your response.	No
Mon_073_006_010623	S42	Email	The assessment has identified that the proposed cable will cross the registered Gwrych Castle Historic Park and Garden and its boundary wall which is a grade II listed building. It is currently proposed to horizontally directionally drill the cable under the boundary wall, therefore protecting it from damage and the cable route has been designed to avoid the loss of any parts of the designed landscape which cannot be easily reinstated, such as tree belts. It is therefore currently thought that this approach will limit the adverse impact of the proposed cable on the registered Gwrych Castle Historic Park and Garden to low. However, Cadw would welcome further discussion on this impact to ensure that appropriate mitigation measures are implemented.	The assessment of impacts and effects relating to the Registered Park and Garden at Gwrych Castle is presented in Volume 3, Chapter 5: Historic Environment of the Environmental Statement. Although the cable route will pass below the Grade II listed boundary wall through a form of trenchless technique, an existing access through this wall will need to be widened in order for construction traffic to pass through. A separate Listed Building Consent application for this work will be submitted to Conwy County Borough Council.	Yes
Mon_073_007_010623	S42	Email	The geophysical survey is ongoing and has identified a small number of features of potential archaeological interest at several locations within the Mona Proposed Onshore Development Area. The initial analysis suggests that none of the features is of national importance, although further data processing is	The onshore geophysical survey has been completed and the results of this work are presented in Volume 7, Annex 5.3: Onshore geophysical survey report of the Environmental Statement. A programme of further archaeological evaluation by way of trial trenching has	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			required to be undertaken and there may be requirement for archaeological evaluation to be carried out, in order to fully establish their nature, extent and significance. If archaeological evaluation is required, this should be carried out before the environmental statement is completed.	commenced and the results of the work completed thus far are presented in Volume 7, Annex 5.5: Trial trenching report of the Environmental Statement. The programme of trial trenching will resume in the spring of 2024 and the results will be shared with all relevant parties. This approach has been agreed with the appropriate stakeholders.	
Mon_073_008_010623	S42	Email	The impact of the proposed development, especially the substation, on the setting of the designated historic assets has not yet been assessed. This will need to be carried out following the methodology outlined in the Welsh Government document "The Setting of Historic Assets in Wales". In particular this assessment will need to carefully consider the impact of the development on the settings of listed buildings Gwrych Castle; Gwyrch Estate Boundary Wall; Plas Newydd and Pentre Meredydd.	An assessment of the impact of the onshore elements of the Mona Offshore Wind Project, including the Onshore Substation, on the settings of designated heritage assets has been undertaken. The results of this assessment are summarised in Volume 3, Chapter 5: Historic Environment of the Environmental Statement and presented in detail in Volume 7, Annex 5.6: Settings assessment of the Environmental Statement. The assessment was carried out in accordance with the Welsh Government document 'The Setting of Historic Assets in Wales' (Cadw, 2017b).	No
Mon_073_009_010623	S42	Email	Annex A ONSHORE	The Applicant notes your response.	No
Mon_073_010_010623	S42	Email	Within the application area Registered Parks and Gardens PGW(Gd)58(CON) Gwrych Castle Listed Buildings 153 Plas Newydd 199044 Gwyrch Estate Boundary Wall from Tan-yr-Ogof to Gwyrch Lodge	The Applicant notes your response.	No
Mon_073_011_010623	S42	Email	Within a 3km buffer Scheduled Monuments DE007 Tyddyn Bleiddyn Burial Chamber DE008 Pen-y-Corddyn Camp DE031 The Mount, Abergele DE037 Bedd-y-Cawr Hillfort DE038 Ffynnon Fair (Well), Cefn DE082 Mynydd y Gaer Camp DE114 Castell Cawr Hillfort DE115 Cefn Cave DE116 Bont Newydd Cave DE116 St George's Well, Abergele FL026 St Asaph Bridge FL027 Pont Dafydd (old) FL186 First World War Practice Trenches at Bodelwyddan	The Applicant notes your response.	No
Mon_073_012_010623	S42	Email	Registered Parks and Gardens: PGW(C)2(DEN) Bodelwyddan Castle PGW(C)28(DEN) Plas Heaton PGW(C)41(DEN) Llannerch Hall PGW(Gd)53(CON) Garthewin PGW(Gd)54(CON) Kinmel Park PGW(Gd)55(CON) Plas Uchaf, Llannefydd	The Applicant notes your response.	No
Mon_073_013_010623	S42	Email	Registered Historic Landscape: HLW (C) 1 The Vale of Clwyd HLW (C) 4 Lower Elwy Valley	The Applicant notes your response.	No
Mon_073_014_010623	S42	Email	Listed Buildings 142 Parish Church of St. Cynfran II* 148 Old Telegraph House II 149 Dinorben Hall II* 150 Faerdre II* 151 Pont Meredydd II	The Applicant notes your response.	No



Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
	152 Plas Coch II 153 Plas Newydd II* 154 Plas-yn-Cefn II 155 Bont Newydd (partly in Cefnmeiriadog community) II 156 Pont y Ddol (partly in Llannefydd community) II 159 Pont-y-Gwyddel (partly in Llanfair Talhaiarn community) II 160 Plas Harri 162 Plas Uchaf 163 Berain 164 Bryn-Ffanigl-Uchaf 165 Bryn-Ffanigl-Uchaf 165 Bryn-Ffanigl-Uchaf 165 Bryn-Ffanigl-Uchaf 166 Pant Idda 167 Ty Mawr 168 Paris Church of St Michael 170 Peniarth Fawr 171 Plas-yn-Betws 174 Former Laundry Block at Plas-yn-Cefn 175 Wigfair Isaf 176 Dolbelidr 178 Plas Newydd 178 Pias Newydd 179 Stable and Carthouse Range at Plas Harri 170 Ls-haped Barn at Plas Harri 170 Ty Gwyn 170 Syn-Y-Aled (partly in Llanfair Talhaiarn community) 170 L-shaped Agricultural Range at Plas Uchaf 170 Tan-y-Gaer 170 Tan-y-Gaer 170 Ty Ucha 170 Ty Ont-Lannerch (partly in Waen Community) 171 Gwyn 172 Roill Lannerch (partly in Waen Community) 172 Gallifaenan Hall 173 Kinmel 174 Cyn-Cogt Lodge including adjoining walls and towers to S, E and W 175 Kinmel 175 Chydro-Morgan 176 Pentre-mawr 177 Church of St Michael 177 Church of St Michael 178 Sirior Bach 179 Church of St Michael 179 Church of St Michael 179 Church of St Michael 179 Tan-y-Cogt Lodge, also known as Abergele Lodge 170 Tan-y-Cogt Lodge, also known as He Golden Lodge and Gate Lodge 171 Tan-y-Osgricultural Range 171 Tan-y-Cogt Lodge, also known as the Golden Lodge and Gate Lodge 171 Tan-y-Cogt Lodge, also known as the Golden Lodge and Gate Lodge 171 Tan-y-Cogt Lodges 171 Tan-y-Cogt Lodges 172 Terfyn Cottages 173 Terfyn Cottages 174 Terfyn Cottages 175 Terfyn Cottages 177 Llan Nursing Home 175 Church of St Mary, with churchyard walls 177 Llan Nursing Home 175 Church of St Mary, with churchyard walls 177 Llan Nursing Home 175 Church Hall including Gates and		



Walls to Forecourt 2019 Ty Uchan 271 Telephone Gall-box oxideith the Yorn Inn 271 Telephone Gall-box oxideith the Yorn Inn 271 Telephone Gall-box oxideith (Proc Office) Stores 273 Telephone Gall-box oxideith (Proc Office) Stores 275 Bann, Agricultural Range and associated garden walls and towers at Hen Wynch Farm 277 Former Medical Hat 277 Former Medical Hat 277 Former Medical Hat 278 Former Hall Penguren Collegol 1837 Faund Farm 1838 Forend-box with Domestic Boundary Wells 1836 Forend-box with Domestic Boundary Wells 1836 Forend-box with Domestic Boundary Wells 1837 Bard Store (Title Martitle Church) 1837 Bard Store (Title Martitle Church) 1838 Bard Store Word Farmer-Oxide Farmhouse 1839 Forend-Farm Gall-box with Domestic Boundary Wells 1839 College Farmhouse 1839 Forend-Farmhouse 1839 Forend-Farmhouse 1839 Schelburghon Churchon 1830 Penillar (Farmhouse With Carden Wall and Gate 1840 Penillar (Farmhouse With Carden Wall and Gate 1841 Penillar (Farmhouse With Carden Wall and Gate 1843 Penillar (Farmhouse With Carden Wall and Gate 1844 Sammon Hat (Farmhouse With Carden Wall and Gate 1843 Penillar (Farmhouse With Carden Wall and Gate 1843 The Gourt House 1843 The Gourt House 1844 Sammon Hat (Farmhouse With Carden Wall and Gate 1844 Sammon Hat (Farmhouse With Carden Wall and Gate 1845 The Gourt House 1844 Sammon Hat (Farmhouse With Carden Wall and Gate 1845 Shapp Hat (Farmhouse With Carden Wall and Gate 1845 Shapp Hat (Farmhouse With Carden Wall and Gate 1845 Shapp Hat (Farmhouse With Carden Wall and Gate 1845 Shapp Hat (Farmhouse With Carden Wall and Gate 1845 Shapp Hat (Farmhouse With Carden Wall and Gate 1845 Shapp Hat (Farmhouse Wall and Gate 1845 Shapp Hat (Farmhouse Wall and Gate 1845 Shapp Hat (Farmho	Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
1452 1 High Street 1453 1A High Street 1454 Including Yu's Chinese 1455 Conservative Club 1456 H.M. Cleaver & Co. (Solicitors) 1457 Barrow Crafts (including Antiques Shop) 1458 The Old Rectory				289 Ty Ucha 271 Telephone Call-box outside the Harp Inn 272 Telephone Call-box outside Post Office Stores 273 Telephone Call-box outside Post Office Stores 275 Barn, Agricultural Range and associated garden walls and towers at Hen Wyrch Farm 277 Former Medical Hall 278 Bridge over Former Railway Line at Llannerch Park 1356 Pengwern Hall (Pengwern College) 1357 Faenol Fawr 1358 Faenol-bach with Domestic Boundary Walls 1376 Bodeugan Farmhouse 1377 Church of St Margaret (The Marble Church) 1378 Barn to NW of Faenol-broper Farmhouse 1379 Faenol Fawr Old Farmhouse 1380 Fferm Farmhouse 1381 Gwernigron Farmhouse 1381 Gwernigron Dovecote 1383 Bodelwyddan Castle Ice House 1385 Pen-isa'r-Glascoed Farmhouse with Garden Wall and Gate 1418 Dovecote at Bodeugan Farm 1419 Pnt Dafydd 1420 Pont Llannerch (Partly in Trefnant Community) 1428 The Bryn 1429 Summer House in the Grounds of The Bryn 1430 Sundial in the grounds of The Bryn 1431 The Court House 1432 The Old Deanery 1434 Midland Bank 1435 Red Lion P.H. 1436 St. Asaph Auction Rooms 1437 House at St. Asaph Auction Rooms 1437 House at St. Asaph Auction Rooms 1437 House at St. Asaph Auction Rooms 1438 The Hendre 1439 Plas yn Roe 1440 April Cottage 1441 Rose Hill House 1442 Southcroft including North Cottage 1443 Staverton 1444 Former Coach House, Stables & Outbuildings to Staverton & Southcroft 1445 St. Asaph 146 Mary Short Memorial Drinking Fountain 147 St. Kentigern & St. Asaph Parish Church 1448 Railings & Boundary Walls to St. Kentigern & St. Asaph Parish Church 1448 Railings & Boundary Walls to St. Kentigern & St. Asaph Parish Church 1451 Greengrocer's Shop 1452 I High Street 1453 I Heigh Street 1454 Including Yu's Chinese 1455 Conservative Club 1456 H.M. Cleaver & Co. (Solicitors) 1457 Barrow Craffs (including Antiques Shop)		





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		1460 Cathedral Church of St. Asaph 1461 Translator's Memorial 1462 St. Asaph Diocesan Office 1463 Former Barber Shop 1464 Elwy Bank including D.P. Nash 1465 Glasgow House including County Cleaners, Halifax Building Society & Shoe Repairs) 1466 Glasgow House including County Cleaners, Halifax Building Society & Shoe Repairs 1467 Beulah House (K&M Massey, including St. Asaph Video) 1468 The Barrow Arms P.H. 1469 The Old Palace 1470 Lodge & Gatepiers at driveway to the Old Palace 1471 Tithe Barn House 1472 Palace Gardens 1473 Glan Elwy 1474 The old China Shop, including China House 1475 Roe Gau 1476 Suncot 1477 Min-Aton 1478 Glandwr (St. Asaph Cricket & Social Club) 1479 Talardy Hotel 1480 Greenhouse at Talardy Hotel 1481 Walled Garden at Talardy Hotel 1482 Plas Coch Rest Home (main block only) 1483 St. Asaph V.P. School 1484 Rosslyn 1485 H.M. Stanley Hospital (front range plus attached cross-plan ranges & Chapel only) 1486 Ysgubor-y-Coed Farmhouse 1487 Esgobyt Farmhouse 1487 Esgobyt Farmhouse 1489 Dovecote at Esgonty Farm 1490 Garden Wall at Esgobyt Farm 1491 Bryn Asaph including Gate House Range 1492 Outbuildings to N of Faenol-bach 1495 Felin-y-gors 1505 Rhyllon Farmhouse 14544 Glan Aber 14769 The Pen-y-bont Inn 14973 Rhydyddauddwr Farm 14973 Rhydyddauddwr Farmhouse 14976 Barn at Rhydyddauddwr Farm 14977 Badoryn Cottages 18477 No 3, Bodoryn Cottages 18477 No 4, Bodoryn Cottages 18477 No 4, Bodoryn Cottages 18473 No 4, Bodoryn Cottages 18475 No 4, Bodoryn Cottages 18475 No 4, Bodoryn Cottages 18476 Bodoryn Cottages 18477 No 4, Bodoryn Cottages 18677 Church House 18681 Eywer Mynydd Seion 18663 Bowden House		



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			18664 Church of St Theresa of Lisieux 18665 Mausoleum in Churchyard of the Church of St George 18666 Park Gates and Gatepiers to the NW entrance to Kinmel Park 18667 Village Hall 18668 Kinmel Arms 18669 Hurch of St George 18670 4 Main Street 18671 5 Main Street 18673 6A Main Street 18673 6A Main Street 18673 6A Main Street 18673 6A Main Street 18675 Llwyni Lodge Gate Piers 18675 Llwyni Lodge Gate Piers 18676 Roberts Monument at Eglwys Mynydd Seion 18677 Gazebo and Summer House in Venetian Garden at Kinmel, including attached steps 18678 Fountain in Venetian Garden at Kinmel 18680 Walls and Gate Piers to the Venetian Garden at Kinmel, with 3 sets of steps 18681 Coach-house and Stable Range at Kinmel with terrace walls, steps and archway to E 18682 Kitchen Garden Walls SE of Kinmel 18683 St Paul Addoldy yr Eglwys Fethodistiadd 18684 Eglwys Crist Addoldy'r Annibynnwyr 18685 Dinorben Lodge 18686 Barn at Dinorben Hall 18687 St George Gate Lodge to Kinmel Park 18688 Garden Bridge and attached sunken service road walls and abutments at Kinmel 18690 (cehouse to the NW of the Kitchen Garden at Kinmel 18693 Cates and Gate Piers at the W end of the Broad Walk 18692 Gates and Gate Piers at the W end of the Broad Walk 18693 Entrance Screen to the main entrance front at Kinmel 18694 Gates and Gate Piers at the W end of the Broad Walk 18695 Toll Bar Cottage 18696 English Presbyterian Church 18697 Monument to the great rail disaster of 1868 in the Churchyard of Church of St Michael 18699 National Westminster Bank 18700 Ty-mawr Terrace 18702 Schoolmaster's House to the former Abergele Church School, with outbuildings to the E. 18703 Abergele and Pensarn Station, 'Up' Platform Building, 18705 Abergele and Pensarn Station, 'Up' Platform Building, 18706 Signal Box at Abergele and Pensarn Railway Station 18707 West Range of Farmyard Buildings at Plas Kinmel 18710 Piggery at Plas Kinmel 18710 Piggery at Plas Kinmel		
			18713 Hendre-fawr		





18714 Outbuilding at Hendre-fawr including yard walls. 18715 Hendre-uchaf 18716 Lodge to Bryngwenallt	result of feedback)
18717 Garden House 18719 Pillar Box adjacent to St George's House 18720 Shop adjoining former Medical Hall 18719 Pillar Box adjacent to St George's House 18720 Shop adjoining former Medical Hall 18725 Memor Cross at St Cynbryd's Church 19022 Memor Cross at St Cynbryd's Church 19027 Ty Ucha 19027 Ty Ucha House 19020 Ty Ucha House 19030 Ty Ucha Bach 19030 Ty Ucha Bach 19031 Ty Ucha House 19030 Ty Ucha Cottage 19030 Church Hall including Tool Shed to S 19030 Boundary Stone at junction of Rhyd-y-Foel and Clipterfyn Roads 19033 Fy Cwyn 19038 Lady Eleanor's Tower 19037 Nant-y-Bella Lodge 19038 Hen Whych 19039 Hen Whych 19039 Hen Whych 19039 Hen Whych 19039 Hen Whych 19040 Tran-y-Ogof including adjoining crenellated boundary walls and towers 19040 Tran-y-Ogof Farmhouse including adjoining arch and walls to E 19040 Tran-y-Ogof Farmhouse including adjoining arch and walls to E 19040 Tran-y-Ogof Farmhouse including adjoining arch and walls to E 19040 Tran-y-Ogof Farmhouse including adjoining arch and walls to E 19040 Tran-y-Ogof Farmhouse including adjoining arch and walls to E 19040 Tran-y-Ogof Farmhouse Ronage at Tran-y-Ogof Farmhouse 19040 Tran-y-	



Unique Reference Type const	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
	19219 Pont-yr-allt-Goch (partly in Cefnmeiriadog Community) 19851 Sundial and base at the Church of St Nefydd and St Mary 19852 Bier-house at the Church of St Nefydd and St Mary 19853 Brewhouse and Piggeries at Plas Harri 19854 Barn Range at Plas Uchaf 19855 L-shaped Agricultural Range at Berain 19856 Former Carthouse at Berain 19856 Former Carthouse at Berain 19857 Brewhouse and Pigsty Range at Berain 19858 Bod-Ysgawen-Isaf 19859 Primary Barn and adjoining Cart Bays to NE of Plas Buckley 19860 Tal-y-Bryn 19864 Agricultural Range at Bryn Deunydd 19866 and Manse at Fynhonnau 19867 Plas Isaf 19868 Former Domestic Range at Plas Isaf 19868 Former Domestic Range at Plas Isaf 19869 Pont-y-dol (partly in Cefnmeiriadog community) 19925 Wigfair Hall 19926 Terraces and Forecourt Walls at Wigfair Hall 19927 Bont Newydd (partly in Llannefydd community) 19928 Telephone Call-box 19929 Pentre Meredydd 19930 Pont-y-Allt-Goch (partly in Trefnant community) 19931 Barn at Pen-ucha-roe-bach 19932 Ddol 19933 Ffynnon Fair 19934 Former Stable Block at Plas-yn-Cefn 19935 Stable and Coachhouse Range at Plas-yn-Cefn 19936 Former Carthouse Block at Plas-yn-Cefn 19937 Former Smithy Range at Plas-yn-Cefn 19938 Former Stable Block at Plas-yn-Cefn 19939 Former Smithy Range at Plas-yn-Cefn 19930 Former Smithy Range at Plas-yn-Cefn 19930 Former Smithy Range at Plas-yn-Cefn 19931 Groesffordd Marii Chapel 20022 Railed Wynne Vault in churchyard of St Michael's Church 20084 Railed Pair of Tombs in churchyard of St Michael's Church 20084 Railed Poine Vault in churchyard of St Michael's Church 2019 Milestone 20113 Cefn Castell 20114 Agricultural Range at Flanerydd community) 20166 Pont-yr-Gwyddel (partly in Llannefydd community) 20167 -yr-Allt 20169 Pigeon-house and Stable Block at Bronheulog 20161 Carthouse at Bronheulog 20162 Former Brewhouse at Faerdre 20164 Pont Meredydd (partly in Llannefydd community) 20166 Pont-yr-Refrith 20174 Firith 20174 L-shaped Agricultural Range at Ty'n-y-Ffrith 20177 L-shaped Agricultural Range at Ty'n-y-Ffrith 20174 L		





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			200897 Glascoed Lodge on Bodelwyddan Park Boundary 26024 Bodeugan Outbuildings 807141, The Village 80715 10, The Village 80716 11, The Village 80716 11, The Village 80716 11, The Village 80718 13, The Village 80719 4, The Village 80719 4, The Village 80729 15, The Village 80720 15, The Village 80721 16, The Village 80721 16, The Village 80722 17, The Village 80722 17, The Village 80722 17, The Village 80722 17, The Village 80722 2 Terfyn Cottages 80725 2, The Village 80724 2 Terfyn Cottages 80725 2, The Village 80727 4 Terfyn Cottages 80725 2, The Village 80727 4 Terfyn Cottages 80725 3, The Village 80737 3, The Village 80737 3, The Village 80732 7, The Village 80732 7, The Village 80733 8 Terfyn Cottages 80731 6, The Village 80735 9, The Village 80735 9, The Village 80736 Bodelwyddan Park Wall with entrances and cottages 80737 8 Dodelwyddan Village Hall (former School) 80738 Bryn Celyn Lodge on Bodelwyddan Park Boundary 80739 Churchyard Wall of St Margaret's 80740 Coach House at Pengwern Hall with Outbuildings Range to W 80741 Faenol Fawr Born 80742 Faenol Fawr Bovecote 80743 Farm Range to W of Faenol-bach Farmyard 80744 Farm Range to W of Faenol-bach Farmyard 80744 Farm Range to W of Faenol-bach Farmyard 80745 Bodelwyddan Vicarage 80764 Coach House at Pengwern Hall 80747 Garden Shelter in Bodelwyddan Castle Garden 80755 Oers Mill Cottage at Pengwern Hall 80747 Garden Shelter in Bodelwyddan Castle Garden 80753 Pen-isa'r-Glascoed Outbuilding 80752 Obelisk in Bodelwyddan Castle Garden 80755 Farm Ranges to W of Faenol-bach Farmyard 80754 Farric-Glascoed Outbuilding 80754 Parisa'r-Glascoed Outbuilding 80755 Obelisk in Bodelwyddan Castle Garden 80755 Farm Ranges to W of Faenol-bach Farmyard 80755 Farm Ranges to W of Faenol-bach Farmyard 80755 Obelisk in Bodelwyddan Castle Garden 80755 Farm Ranges to W of Faenol-bach Farmyard 80757		
Mon_073_015_010623	S42	Email	OFFSHORE Scheduled Monuments DE008 Pen-y-Corddyn Camp DE031 The Mount, Abergele DE114 Castell Cawr Hillfort Registered Parks and Gardens: PGW(Gd)58(CON) Gwrych Castle	Response noted.	No





Unique Reference Type of consulte S42/S47	ee method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
		Registered Historic Landscape: HLW Gw) 5 Creuddyn and Conwy		
Mon_073_016_010623	Email	Listed Buildings 142Parish Church of St. Cynfran 146 St Trillo's Chapel 148Old Telegraph House 166 Pant Idda 168 Nant Fawr 231 Gwrych Castle including attached walls and towers and Stable Block. 232 Tan-yr-Ogof Lodge including adjoining walls and towers to S, E and W 233 King's Lodge, also known as Abergele Lodge 235 Tyddyn-Morgan 236 Pentre-mawr 237 Church of St 239 Abergele Community Centre 250 Church of St Mary, with churchyard walls 251 Ty'n Llan Nursing Home 252 Towyn and Kinmel Bay Youth Club * 269 Ty Ucha 271 Telephone Call-box outside the Harp Inn 273 Telephone Call-box outside Post Office Stores 275 Barn, Agricultural Range and associated garden walls and towers at Hen Wyrch Farm 277 Former Medical Hall 14544 Glan Aber 14545 Stables and Coach-house Range at Glan Aber 14769 The Pen-y-bont Inn 14825 United Reformed Church 14839 4, TRILLO AVENUE, Rhos on Sea,, CLWYD, 14840 White Cottage 14862 Western Portal of Penmaen Rhos Railway Tunnel 18577 Church House 18658 Tower on Tower Hill 18659 Estate Boundary Wall to Gwrych Castle Park (part in Abergele Community) 18660 Betws Lodge 18661 Lych Gate to Church of St Michael 18662 Egliyws Mynydd Seion 18663 Bowden House 18664 Church of St Theresa of Lisieux 18676 Roberts Monument at Eglwys Mynydd Seion 18683 St Paul Addoldy yr Eglwys Fethodistiadd 18684 Egliyws Crist Addoldy'r Annibynnwyr 18695 Toll Bar Cottage 18698 The Castle, Y Castell 18699 National Westminster Bank 18700 Ty-mawr Terrace 18701 Ty-mawr Terrace 18702 Choolmaster's House to the former Abergele Church School, with outbuildings to the E. 18703 Abergele and Pensarn Railway Station Booking Hall 18704 Abergele and Pensarn Railway Station	The Applicant notes your response.	No No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			18711 Bryngwenallt 18712 Tyddyn-uchaf Old Farmhouse 18713 Hendre-fawr 18714 Outbuilding at Hendre-fawr including yard walls. 18715 Hendre-uchaf 18716 Lodge to Bryngwenallt 18720 Shop adjoining former Medical Hall 19024 Parish Church of St Cynbryd 19025 Memorial Cross at St Cynbryd's Church 19026 Lychgate at St Cynbryd's Church 19027 Ty Ucha 19028 Ty Ucha 19029 Ty Ucha House 19030 Ty Ucha Bach 19031 y Ucha Cottage 19032 Church Hall including Tool Shed to S 19033Boundary Stone at junction of Rhyd-y-Foel and Clipterfyn Roads 19034 Bryn Tirion 19035 Ty Gwyn 19036 Lady Eleanor's Tower 19037 Nant-y-Bella Lodge 19039 Hen Wrych 19039 Hen Wrych Lodge including adjoining crenellated boundary walls and towers 19040 Plas Tan-yr-Ogof including adjoining walls and arches to E and W 19041 Tan-yr-Ogof Farmhouse including adjoining arch and walls to E 1942 Stable and Cart House Range at Tan-yr-Ogof Farm 19043 Northern Towers 19044 Gwrych Estate Boundary Wall from Tan-yr-Ogof to Gwrych Lodge 19045 Gwrych Estate Boundary Wall from Tan-yr-Ogof to Gwrych Lodge		
Mon_119_001_190623	S42	Email	to Table 19.16 the impact on buried archaeology is clearly unknown yet pending	work are presented in Volume 7, Annex 5.3: Onshore geophysical survey report of the Environmental Statement. A programme of further archaeological evaluation by way of trial trenching has commenced and the results of the work completed thus far are presented in Volume 7, Annex 5.5: Trial trenching report of the Environmental Statement.	No
Mon_015_016_160623	S42/S44	Email	Heritage assets Paragraph 1.4.2.21 of the Desk Assessment notes that there is limited intervisibility with the Grade II* Registered Historic Park and Garden of Gwrych Castle (sic) (Site 6), located approximately 2.2km and 3.5km from the eastern and western substations, respectively. The reference to Gwrych Castle in this context is presumably an error, as the accompanying map identifies Site 6 as the Registered Historic Park and Garden at Kinmel Park, and this site is closer than Gwrych Castle to the substation locations. Further assessment of this matter will be required once the location and design of the substation has been refined.	The errors have been corrected. Impacts on settings are considered in Volume 7, Annex 5.6: Settings assessment of the Environmental Statement.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_158_014_020623	S44	Feedback form	Grade II Listed Buildings should not be situated within onshore cable corridor boundaries.	The Applicant notes your response. Following the statutory consultation, the Onshore Cable Corridor has been refined to deselect options along the Onshore Cable Corridor and to reduce the width of the corridor. The refinement process was informed by comments received during the consultation process and by engineering design. This has removed any Grade II Listed Buildings from the onshore cable corridor boundary. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference: F1.4) for full details of the onshore cable corridor refinements.	Yes
Mon_158_020_020623	S44	Feedback form	Pentre Meredydd is a Grade II Listed Building situated just west of Option 2 and within the cable corridor. It is a designated historic asset located just outside Mona proposed onshore development area. (19.4.3.3). I would like this point clarifying as surely the cable corridor IS part of the proposed onshore development area? If so, why is the PEIR stating that Pentre Meredydd is located "just outside"??	The impacts of the Mona Offshore Wind Project on the listed buildings and their settings are assessed in Volume 3, Chapter 5: Historic Environment of the Environmental Statement.	No
Mon_172_001_210423	S47	Consult Online	This is a massive piece of work with a huge impact on what our land will look like afterwards not to mention the distribution. It is also disturbing several significant archaeological sites, and sites of scientific interest. Please do not do this	The impacts of the Mona Offshore Wind Project on archaeological sites are assessed in Volume 3, Chapter 5: Historic environment of the Environmental Statement. The impacts on ecological receptors (including designated sites) are assessed in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement.	No
Mon_172_002_210423	S47	Consult Online	This is a massive piece of work with a huge impact on what our land will look like afterwards not to mention the distribution. It is also disturbing several significant archaeological sites, and sites of scientific interest. Please do not do this	The impacts of the Mona Offshore Wind Project on archaeological sites are assessed in Volume 3, Chapter 5: Historic environment of the Environmental Statement. The impacts on ecological receptors (including designated sites) are assessed in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement.	No
Mon_172_003_210423	S47	Consult Online	This is a massive piece of work with a huge impact on what our land will look like afterwards not to mention the distribution. It is also disturbing several significant archaeological sites, and sites of scientific interest. Please do not do this	The impacts of the Mona Offshore Wind Project on archaeological sites are assessed in Volume 3, Chapter 5: Historic environment of the Environmental Statement. The impacts on ecological receptors (including designated sites) are assessed in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement.	No
Mon_196_005_010623	S44	FREEPOST	The roads around Option 7 are single track roads and the junction from St Asaph onto the Cefn Meiriadog road is very tight. Glascoed Road (B5381) is a Roman road and should be left as such without causing unnecessary damage and continual heavy tragic usage.	Onshore Substation Option 7 has been discounted from the site selection process following the S42 consultation. The decision was communicated via newsletter (and website update) in Autum 2023. The decision-making for the de-selection of Onshore Substation Option 7 is explained in detail in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives	Yes

Document Reference: E3.1
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D.25.20 Land use and recreation table of responses



Table D.25. 20: Land use and recreation table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_026_002_070523	S47	Email	What will the impact be on the coastal cycleway between Llandulus and Kimmel Bay and will this be closed/disrupted at any stage?	The Mona Offshore Wind Project has committed to using trenchless technology at the landfalll, therefore there will be no impact to the cycleway between Llandulas and Kinmel Bay. More information is available in Volume 3, Chapter 7 Land use and recreation of the Environmental Statement.	Yes
Mon_054_427_010623	S42/S44	Email	Offa's Dyke Path is referenced as a component of the AONB's Special Qualities (under access, recreation and tourism)7. Supplementary Planning Guidance (SPG)Policies relevant to this quality include ensuring that the attractiveness of the AONB's landscape and views as a primary basis for the area's tourism are retained. Safeguarding panoramic views and tranquillity are also referenced under the landscape character and quality Special Quality. These matters have not been addressed in the PEIR as SPG. NRW (A) note that the Clwydian Range and Dee Valley AONB, 2018 is not referenced, but should be.	The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform. The impact on the landscape setting of the Clwydian Range and Dee Valley NL and on visual receptors using Offa's Dyke Path within the NL has also reduced. The effects on people using the Offa's Dyke Path National Trail is undertaken in Volume 3, Chapter 6: Landscape and Visual Resources. The effect on the Offa's Dyke Path as a special quality of the NL is undertaken in Volume 6, Annex 8.5: International and nationally designated landscapes study. The findings are also within the chapter.	Yes
Mon_070_035_010623	S42	Email	4. Tourism and Recreation. The Isle of Anglesey is a unique and popular destination for visitors and local people alike. The Island offers peace, tranquillity, adventure and experiences along with fantastic views and vistas, a distinct Area of Outstanding Natural Beauty covering practically the whole coastline of the Island, UNESCO World Geo Park, Beaumaris Castle – UNESCO sites and a multitude of other attractions.	The Applicant has noted your response. Volume 4, Chapter 3: Socio- economics of the Environmental Statement acknowledges the visual amenity of North Wales and that the area supports a wide range of recreation activities which draw in tourists.	Yes
Mon_070_036_010623	S42	Email	Anglesey's tourism industry currently attracts over 1.79million visitors annually with a total economic impact in excess of £362million. The sector also supports over 4000 jobs on the island and is now one of Anglesey's largest industries.	The Applicant has noted your response. A description of the visitor economy within North Wales is set out within the baseline section of Volume 4, Chapter 3: Socio-economics of the Environmental Statement.	Yes
Mon_070_037_010623	S42	Email	Tourism contributes to local prosperity and quality of life in Anglesey. The Island needs to manage and develop tourism because this is where it has a natural comparative advantage.	The Applicant has noted your response. Prosperity and quality of life is addressed in the baseline economic and social sections of Volume 4. Chapter 3: Socio-economics of the Environmental Statement.	Yes
Mon_070_038_010623	S42	Email	Based on a consideration of the pathways by which tourism and recreation activities might be impacted by Mona Offshore Wind Project during the construction phase, it is noted within Chapter 24 that the impact on tourism and recreation is likely to be not significant in EIA terms.	The Applicant has noted your response. This conclusion remains correct - see Volume 4, Chapter 3: Socio-economics of the Environmental Statement.	Yes
Mon_077_001_020623	S44	Email	Dear Sirs , We are appointed as Agents to represent our above mentioned client whom is a Tenant of the agricultural holding known as REDACTED (forming an integral part of REDACTED farming enterprise) . Our client strongly objects to the proposal for the onshore substation ('Option 2) to be located within works area 16A (as referred to on page 37 of the attached draft DCO) and shown on Sheet 14 of the Works plans as well as the onshore cable route within works Area 15A (shown in its entirety on Sheet 13 of the Works plans-: Example RPS report template (enbw-bp-consultation.s3.eu-west-2.amazonaws.com)) as -: 1. it will significantly reduce the farmable area (in part on a permanent basis) which is vital for grazing and forage production for our client's dairy herd. 2. our client has made significant investment both in terms of time and monetarily over ap period of 16 years in improving the productivity of the land, for instance by means of drainage infrastructure, fencing and in respect of grassland reseeding and management. 3. there is concern that a number of impressive veteran oak trees located on the land will be felled, should the development be granted.	recreation study area are considered in Volume 3, Chapter 7: Land use and recreation of the Environmental Statement. In the event that substantiated and tangible losses are incurred as a result of the project, they will be compensated for under the compensation code upon the implementation of the DCO. Impacts to veteran trees have been avoided through design refinements which have been applied post-PEIR.	No
			The proposal will have a considerable adverse impact on our client's agricultural business given that the opportunity to secure conveniently located parcels of appropriate quality and characteristics, required for dairy production, in the near		





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method		Applicant response	Project change (directly or indirectly as a result of feedback)
			locality are very scarce- rendering such a sizeable block irreplaceable .		
			Yours faithfully,		
Mon_079_004_040623	S42	Email	(3) A key consideration therefore is proportionality, of which there are two aspects. Firstly, in terms of its essential rural character, loss of its agricultural land, and the size and density of its population, the scale of proposed and existing infrastructure, and in particular the scale of the Mona proposal, is wholly out of proportion to the community in which it is being sited. Indeed it would be difficult to overstate the disproportionality of it. Secondly, and equally disproportionately, the community of Cefn Meiriadog is being made to bear the entire burden of the impact of these very major developments, where other communities remain unaffected or minimally affected by them. In summary, both aspects penalise Cefn Meiriadog in an extremely disproportionate way.	Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4). The project has reduced the height and scale of the onshore substation buildings, as well as micro-siting the onshore substation platform. The impact on the landscape character of the Clwydian Range and Dee Valley NL and on visual receptors using the Offa's Dyke Path within the NL have also been reduced. The impact of changes in land use, including the loss of agricultural land and impacts on access to amenity space are assessed in Volume 3, Chapter 7 Land use and recreation of the Environmental Statement (Document Reference: F3.7). Photomontages of the Mona onshore substation are presented in Volume 7, Annex 6.5: Landscape figures – onshore development of the Environmental Statement. The landscape mitigation measures adopted as part of the Mona Offshore Wind Project are outlined in Table 6.19 and detailed in the Design Principles Document (Document reference J3) are proposed to reduce the potential impact on the scale of the project through screening. The proposed mitigation is shown on the Illustrative Landscape and Ecology Strategy Plan (Figure A.6.4 of Appendix A). An outline LEMP (Document reference J22) accompanies this Environmental Statement.	Yes
Mon_084_001_010623	S44	Email	Dear Sirs , We are appointed as Agents to represent our above mentioned client whom farms land at REDACTED. Our client strongly objects to the proposal for the onshore substation ('Option 7') to be located within works area 17 (as referred to on page 38 of the attached draft DCO and shown on Sheet 18 of the Works plans-: Example RPS report template (enbw-bp-consultation.s3.eu-west-2.amazonaws.com)) as it will -: 1. leave REDACTED homestead without access via the principal driveway (as the entrance off REDACTED road is no longer considered safe to use) 2. significantly reduce the farmable area which is vital for grazing and forage production for our client's dairy herd. 3. result in the slurry compound not being available which is salient for the storage of organic manure for nutrient distribution on the agricultural unit to promote pasture production . Significant investment has been made to the subject land ,over many years, to enhance its productive capacity and the loss of the agricultural parcel will have a considerable adverse impact on our clients farming enterprise (with the opportunity to secure conveniently located parcels of appropriate quality and characteristics ,required for dairy production , in the near locality being very scarce, rendering such a sizeable block irreplaceable).	The Mona Onshore Development Area has been refined following the Preliminary Environmental Information Report (as documented in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement). Option 7 has been removed from the Mona Onshore Development Area and will no longer be impacted by the Mona Offshore Wind Farm.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_108_004_010623	S44	Feedback form	OTHER - We OBJECT to OPTION 7 for the following reasons:- 1. The North Wales Pilgrim's Way – The Welsh Camino is on the Cefn Road and option 7 will be in fields adjacent. Website: pilgrims-way-north-wales.org OR britishpilgrimage.org	Onshore Substation Option 7 has been discounted following the statutory consultation. Recreational resources, including Public Rights of Way located within the land use and recreation study area are identified in Volume 7, Annex 7.1: Published recreational resources technical report of the Environmental Statement. Measures adopted as part of the Mona Offshore Wind Project to mitigate impacts on recreational resources, including Public Rights of Way, National Trails, and other rights of access within the land use and recreation study area are considered in Volume 3, Chapter 7: Land use and recreation of the Environmental Statement. This includes the implementation of measures set out in the Outline Public Rights of Way Management Strategy (document reference J.27). The likely significant effects of the Mona Offshore Wind Project on recreational resources, including Public Rights of Way within the land use and recreation study area are considered Volume 3, Chapter 7: Land use and recreation of the Environmental Statement.	Yes
Mon_002_025_080623	S42/S44	Email	The area of Denbighshire affected by the proposal suffers from the lowest density by area and population of public paths in the whole County despite having the highest population density, and therefore the few paths there are in the north of the County are very important. Even temporary closures will have a significant effect of the local network, although it is accepted the indicative onshore cable corridor proposed seems to have done its best to avoid public paths, the construction phase will still impact on some key rights of way. This is of particular significance with the bridleways which are in extreme short supply in this area and stopping up even temporarily should be avoided or kept to the shortest possible period.	Recreational resources, including Public Rights of Way located within the land use and recreation study area are identified in Volume 7, Annex 7.1: Published recreational resources technical report of the Environmental Statement. Measures adopted as part of the Mona Offshore Wind Project to mitigate impacts on recreational resources, including Public Rights of Way, National Trails, and other rights of access within the land use and recreation study area are considered in Volume 3, Chapter 7: Land use and recreation of the Environmental Statement. This includes the implementation of measures set out in the Outline Public Rights of Way Management Strategy (document reference J.27). The likely significant effects of the Mona Offshore Wind Project on recreational resources, including Public Rights of Way within the land use and recreation study area are considered Volume 3, Chapter 7: Land use and recreation of the Environmental Statement.	No
Mon_002_027_080623	S42/S44	Email	One of the biggest issues that have arisen in the County in the past with such works is when grass land is reinstated within field parcels, fences are then erected to protect re-seed growth, which has resulted in the temporary closure being applied much longer than the Council consider necessary. The Council would want to see the paths reinstated as soon as possible after any excavation and kissing or hand gates to be erected with no stiles on any temporary boundaries crossed by the cable corridor and that authorisation for any such new fences receives consent from the highway authority under S147 of the Highways Act 1980 or will be treated as unlawful and removed once any temporary traffic restriction order closing the path expires.	land use and recreation study area are identified in Volume 7, Annex 7.1: Published recreational resources technical report of the Environmental Statement. Measures adopted as part of the Mona Offshore Wind Project to mitigate impacts on recreational resources, including Public Rights of Way, National Trails, and other rights of access within the land use and recreation study area are considered in Volume 3, Chapter 7: Land use	No
Mon_128_001_230423	S44	Feedback form	It is unclear from the documentation about the specific impact the construction of the onshore elements will have on the local communities. What plans are in place to manage disruption to local traffic, farmland and infrastructure. What if any are the benefits to the local communities? are there any proposals in place eg provision of cheaper energy to the local communities, financial assistance to local community groups/ charities?	The management of construction traffic is set out in the Construction Traffic Management Plan. Impacts on local communities are assessed in Volume 4, Chapter 4: Human health assessment of the Environmental Statement.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_127_006_230423	S44	Feedback form	There would be concern regarding the use of agricultural land for construction, is it not possible to use sections of land that are brownfield sites or part of industrial business estates already.	The location of the Mona Onshore Development Area (including the onshore cable route, onshore substation and temporary construction corridors) is largely influenced but the location of the array area and the Point of Interconnection which has limited opportunities to utilise brownfield sites. The site selection process is described in full in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement.	No
Mon_145_001_260523	S44	Feedback form	Horse riding and grazing.	Recreational resources, including Public Rights of Way located within the land use and recreation study area are identified in Volume 7, Annex 7.1: Published recreational resources technical report of the Environmental Statement. Measures adopted as part of the Mona Offshore Wind Project to mitigate impacts on recreational resources, including Public Rights of Way, National Trails, and other rights of access within the land use and recreation study area are considered in Volume 3, Chapter 7: Land use and recreation of the Environmental Statement. This includes the implementation of measures set out in the Outline Public Rights of Way Management Strategy (document reference J.27). The likely significant effects of the Mona Offshore Wind Project on recreational resources, including Public Rights of Way within the land use and recreation study area are considered Volume 3, Chapter 7: Land use and recreation of the Environmental Statement. Affected landowners will continue to be engaged by the project.	No
Mon_146_002_260523	S47	Feedback form	We at Broadleaf Wales would welcome the opportunity to bid for hedge planting/laying/maintenance and any tree work arising from this project.	The Applicant notes your response and will consider potential suppliers at a later stage in the process.	No
Mon_148_004_260523	S44	Feedback form	Deer, pheasants and cows, sheep etc.	The Applicant notes your response. The project continues to engage with all affected landowners regarding potential impacts to farming practices during construction. Construction will be undertaken in line with a Code of Construction Practice which will help to minimise impacts to animals. An Outline Code of Construction Practice is provided with the application (Document Reference J26).	No
Mon_149_007_260523	S47	Feedback form	Ground conditions could be influenced by cable laying and construction. This is worrying considering the land around the sites.	A full assessment of the impacts on the Mona Offshore Wind Project on ground conditions is provided in Volume 3, Chapter 1 Geology, Hydrology and Ground Conditions of the Environmental Statement.	No
Mon_149_009_260523	S47	Feedback form	This project combined with several others will use up a great deal of agricultural land in this area.	Volume 3, Chapter 7: Land use and recreation of the Environmental Statement assesses the cumulative impacts of the Mona Offshore Wind Project and other nearby developments on best and most versatile agricultural land and farm holdings.	No
Mon_164_007_040623	S44	Feedback form	The current plan will be hugely disruptive to farms, tourism, and all forms of local commerce.	The Applicant believes there will be significant levels of opportunities created for businesses operating in - and supplying goods and services to the offshore wind industry in North Wales. Local jobs will also be created by the Project. Impacts of industries such as agriculture and tourism have been identified and measured, with appropriate mitigation being proposed within our Environmental Statement (see Volume 3, Chapter 7 Land use and recreation and Volume 4, Chapter 3 Socio-economics)	No
Mon_164_012_040623	S44	Feedback form	The impact of two years of construction will be very negative on local tourism, and the wellbeing of local resident.	The Applicant is committed to minimising disruption to local residents. A Code of Construction Practice (CoCP) will be produced and agreed with the relevant local authority. An Outline Code of Construction Practice (Document Reference J26) is provided as part of the application. The CoCP will identify the likely impacts of constructions works and	No





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Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				propose appropriate mitigation measures and set out how those measures will be communicated to local communities.	
Mon_190_001_020623	S47	Email	.if the project was to be in the field directly behind the park it would be a blog on the landscape and the noise and dust etc would cause our static owners no end of distress	The Applicant notes your response. Onshore Substation Option 2 is the final onshore substation location that has been taken forward. Mitigation measures to manage construction impacts including noise and dust are included in the Outline CoCP (document reference J26) and measures to mitigate impacts to the landscape are included in the Outline Landscape and Ecological Management Plan (document reference J22).	No
Mon_196_001_010623	S44	FREEPOST	The North Wales Pilgrim's Way – The Welsh Camino is on the Cefn Road and option 7 will be in fields adjacent. Website: pilgrims-way-north-wales.org OR britishpilgrimage.org	Onshore Substation Option 7 has been discounted following the statutory consultation. Recreational resources, including Public Rights of Way located within the land use and recreation study area are identified in Volume 7, Annex 7.1: Published recreational resources technical report of the Environmental Statement. Measures adopted as part of the Mona Offshore Wind Project to mitigate impacts on recreational resources, including Public Rights of Way, National Trails, and other rights of access within the land use and recreation study area are considered in Volume 3, Chapter 7: Land use and recreation of the Environmental Statement. This includes the implementation of measures set out in the Outline Public Rights of Way Management Strategy (document reference J.27). The likely significant effects of the Mona Offshore Wind Project on recreational resources, including Public Rights of Way within the land use and recreation study area are considered Volume 3, Chapter 7: Land use and recreation of the Environmental Statement.	Yes



D.25.21 Traffic and transport table of responses



Table D.25. 21: Traffic and transport table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_026_003_070523	S47	Email	What will the impact be on the A55 and will this be closed or have roadworks/lane restrictions at any stage as a result of this proposal?	Closures of the A55 are not envisaged to support the construction of the Mona Onshore Wind Project. Traffic routes are considered in the Outline Construction Traffic Management Plan (Document Reference 26.13)	No
Mon_108_008_010623	S44	Feedback form	5. The roads around Option 7 are single track roads and the junction from St Asaph onto the Cefn Meiriadog road is very tight. Glascoed Road (B5381) is a Roman road and should be left as such without causing unnecessary damage and continual heavy tragic usage.	The movement of construction traffic and measures to minimise the impacts are set out in the Outline Construction Traffic Management Plan (Document Reference J26.13). The detailed CTMP will be agreed with the Highways Authorities prior to construction.	No
Mon_002_024_080623	S42/S44	Email	Section 21 – Traffic and Transport It is not clear from the plans if any paths are to be stopped up permanently. The Council would object to any proposal to permanently stop up any right of way.	No PRoWs would be permanently stopped as a result of the Mona Offshore Wind project	No
Mon_002_026_080623	S42/S44	Email	As such, the Council has concerns with the proposed streetworks powers proposed to be embedded in the DCO, as it would remove control from the Council to carefully manage right of way closures at a strategic level.	The Applicant notes your response and will continue to engage with the Council on this matter.	No
Mon_002_028_080623	S42/S44	Email	The Council has concerns that, streetworks powers proposed in the draft DCO would not require rights of way to be brought back into use as soon as practical to do so, and paths may remain closed until all construction works have been completed, which will have a significant impact on the users during the construction phase.	The process for managing interactions with Public Rights of Way is outlined in the Outline Public Rights of Way Management Strategy (Document Reference J27).	
Mon_002_029_080623	S42/S44	Email	Were powers to remain with the local highway authority, the Council do not consider any disruption or delay would be arise by the need for the Council to make the orders under the provisions in the Highway Act, and it would enable the Council to retain strategic oversight over the wider public rights of way which would have clear benefits to rights of way users.	The Applicant notes your response	No
Mon_015_003_160623	S42/S44	Email	Highway and access matters The Council requests the submission of a Traffic Management Plan for Abnormal Indivisible Loads.	An Outline Construction Traffic Management Plan is included in the DCO application. The final CTMP will be agreed with the Highways Authority prior to construction	No
Mon_015_004_160623	S42/S44	Email	The Council notes that any temporary traffic management arrangements required in connection with this application shall be in accordance with Chapter 8 of the Traffic Signs Manual and New Roads and Streetworks Act 1991 and shall be approved by the highway authority.	The Applicant notes your response	No
Mon_015_005_160623	S42/S44	Email	The Council notes that any adjustment, re-siting and/or protection of any statutory undertakers' apparatus in the highway shall be undertaken with the prior written consent of the relevant authority and shall be carried out at the applicant's own expense.	The Applicant notes your response	No
Mon_015_006_160623	S42/S44	Email	The Council requests that the applicant consults with the owners of the bridges over the A55 and railway at Sea Road, Pensarn, and the bridge over the railway near Pensarn Station, to ensure that the movement of construction traffic does not affect the integrity of those structures.	The Applicant notes your response	No
Mon_015_007_160623	S42/S44	Email	The Council requests reassurance that any damage to the surface of the car park at Pensarn beach will be made good expeditiously.	The Applicant notes your response	No
Mon_128_001_230423	S44	Feedback form	It is unclear from the documentation about the specific impact the construction of the onshore elements will have on the local communities.	The management of construction traffic is set out in the Construction Traffic Management Plan. Impacts on local communities are assessed in Volume 4, Chapter 4: Human health assessment of the Environmental Statement.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			What plans are in place to manage disruption to local traffic, farmland. and infrastructure.		
			What if any are the benefits to the local communities? are there any proposals in place e.g., provision of cheaper energy to the local communities, financial assistance to local community groups/ charities?		
Mon_127_004_230423	S44	Feedback form	Should avoid impacting upon access to foot paths, bridle ways or provide an attractive alternate route.	Impacts to PRoW have been minimised where possible. An assessment of potential impacts to PRoW users (and the routes) is detailed in Volume 3, Chapter 7: Land Use and Recreation	No
Mon_128_005_230423	S44	Feedback form	it is difficult to work out from the plans what the impact will be on local traffic. Some of the local roads are not going to be suitable for construction traffic and heavy use will impact upon local residents. It might be helpful to know the specifics of the likely impact, exactly where, and how long for	The management of construction traffic is set out the Outline Construction Traffic Management Plan (Document Reference 26.13)	No
Mon_147_002_260523	S44	Feedback form	We live close to the North Route. The traffic could be disruptive. We have a holiday home site backing onto this site.	Construction traffic management measures will be set out in the Outline Construction Traffic Management Plan (Document Reference 26.13)	No
Mon_148_003_260523	S44	Feedback form	Glascoed Road is always busy, this will be worse, no traffic are able to turn.	The Applicant notes your response	No
Mon_149_006_260523	S47	Feedback form	A great deal of traffic is expected during construction and after completion of the project. This will disrupt residents enormously.	Construction traffic management measures will be set out in the Outline Construction Traffic Management Plan (Document Reference 26.13)	No
Mon_158_018_020623	S44	Feedback form	B5381 Glascoed Road is totally unsuitable for the prolonged use by additional HGVs for multiple concurrent energy projects. This B Road is narrow, has very few safe pavements, or refuge areas for pedestrians and non- vehicular road users. There have been multiple instances of the fracture of the large water main lying beneath the road surface in the last few years, resulting in lengthy road closures as the force of the water (many metres high in the air) has resulted in the road substructure lifting and breaking up. Many roadside properties are old (many Grade II listed) and already suffer vibration effects from current traffic. Property damage will be inevitable.	The environmental impacts of construction traffic associated with the Mona Offshore Wind Project are assessed in Volume 3, Chapter 8: Traffic and Transport of the Environmental Statement. The impacts of noise and vibration arising from construction traffic are assessed in Volume 3, Chapter 9: Nosie and Vibration of the Environmental Statement	No
Mon_161_004_020623	S47	Feedback form	What are your plans for the roman roads you are crossing	Crossing locations and the proposed techniques are identified in Volume 5, Annex 4.3: Onshore crossing schedule of the Environmental Statement	No
Mon_164_008_040623	S44	Feedback form	It is certain that this powerline construction will disrupt local transport for 2 years or more, there must be ways to reduce this through better planning. Local opposition to this project will be strong.	The Applicant is committed to minimising disruption to local residents. A Code of Construction Practice (CoCP) will be produced and agreed with the relevant local authority. An Outline Code of Construction Practice (Document Reference J26) is provided as part of the application. The CoCP will identify the likely impacts of constructions works and propose appropriate mitigation measures and set out how those measures will be communicated to local communities.	No
Mon_166_002_070623	S47	Feedback form	Yes. A55: blockages	The Applicant notes your response	No
Mon_166_007_070623	S47	Feedback form	I note that the A55 will be used. This is an extremely busy road especially in the summer. What effects will this have on visitors + residents.	The environmental impacts of traffic and transport (including driver delay) are assessed in Volume 3, Chapter 8: Traffic and transport of the Environmental Statement	No
Mon_186_002_310523	S47	Consult Online	What disruption will occur during these works on the A548? We rural residents depend on this road being both open and in good condition as flooding is a frequent feature when it rains.	The environmental impacts of traffic and transport (including driver delay) are assessed in Volume 3, Chapter 8: Traffic and transport of the Environmental Statement	No
Mon_197_025_190623	S44	FREEPOST	When the last development took place Dong Energy, we were provided with a traffic management plan which advised of construction traffic being from the St Asaph Business park, this did not work and we had the constant flow of ready mix wagon, stone wagons and cranes (one broke down on Rose Hill a small	An Outline Construction Traffic Management Plan (CTMP) (Document Reference 26.13) is included in the DCO application, the detailed CTMP will	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			section of Glascoed Road) especially as the hauliers are paid on radials from the source of the material.	be agreed with the relevant highways authority. Contractors will be required to follow the routes in the CTMP.	



D.25.22 Noise and vibration table of responses



Table D.25. 22: Noise and vibration table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_076_002_030623	S44	Email	They wish to raise the following matters: 1. Utilities and flooding Work areas 10D and 20 will cut off their water supply which runs through that field from the top road to their house. The field slopes down towards their house and in the past has brought down surface water which has caused flooding. They have paid for work to be undertaken which has now remedied the flooding, however they are concerned that any construction work in the field will cause disruption and potentially cause the flooding to return. 2. Noise and pollution All three routes are extremely close to their home. Given their close proximity, they are concerned about continuous noise and pollution from plant and vehicles that will emanate from the construction site over a period of time and the adverse impact this will have upon their health and well being. 3. Health They are elderly, and this is their retirement home. During the last 9 months they have both suffered with significant ill health and both been hospitalised. Peace and quiet enjoyment of their home is very important for their health. 4. Financial They purchased the land and two stone barns in 1989. They spent the next 12 years developing the site at their own cost which involved considerable hard work. They moved to live there in 2001. Their home is their principle investment and the prospect of this work to the adjacent land will almost certainly have devalued their home already. This will have a significant impact upon their finances. Should the need arise to sell the property; the construction work will have to be disclosed to any potential buyer and will act as a deterrent to any future sale.	The Applicant is working with all utility suppliers to determine the precise location of buried utilities, and the project does not intend to interrupt or divert the delivery of any current utility service. The Environmental Statement Human Health chapter follows guidance (IEMA 2022) in providing a population health assessment. The assessment has regard to vulnerable groups, and in this case assigns them the highest level of sensitivity, but (in line with the assessment methodology set out in guidance) does not reach conclusions on individual level health outcomes. The Environmental Statement Human Health chapter has had regard to local sensitivities, including in relation to age, health status and income, across the scope of issues covered by the assessment. The health assessment scope includes the public health implications of construction effects. Measures to minimise the impacts of construction are set out in the Outline CoCP (Document Reference 26) and its appendices. This includes measures for managing flood risk, dust and noise. A detailed CoCP will be agreed with the relevant stakeholder before construction commences. In the event that substantiated and tangible losses are incurred as a result of the project, they will be compensated for under the compensation code upon the implementation of the DCO.	No
Mon_082_004_020623	S44	Email	 Although you do categorise us as being within a High Impact area: We do not accept that the noise base line survey LT4 purporting to represent Tyddyn Meredydd is at all representative due to the relative large distance away from our property that LT4 was physically sited. 	Whilst the Mona Offshore Wind Project considers that the results of the Baseline Sound Survey reported in the Preliminary Environmental Information Report were representative (were agreed with Denbighshire County Council), a further baseline sound survey was undertaken in September 2023 and included a monitoring location at Tyddyn Meredydd. The results are reported in Volume 7, Annex 9.1: Baseline Sound Survey of the Environmental Statement.	
Mon_082_005_020623	S44	Email	We disagree that you propose to scope out vibration impact on human receptors. Given that we sit on bedrock and a large area of substation option 2 being underlain by Limestone, then during construction foundation works there are inevitably going to be vibration impacts on Tyddyn Meredydd and surrounding properties.	platform in 2023. The results have informed the design refinement process including the design of the foundation works. The construction noise and	No
Mon_082_006_020623	S44	Email	We disagree with your assessment in Noise and Vibration volume 22 summarised in table 22.33 in that you assess noise impacts during construction and operation as being: - Magnitude of Impact - Low Sensitivity - Medium Significance of effect - Minor Adverse For us, living in a low noise environment and with open aspects then Tyddyn Meredydd would be more realistically classified as High, Very High and High respectively.	The assessment of noise and vibration impacts has been undertaken in accordance with industry guidance. The design of the Onshore Substation has been refined since the Preliminary Environmental Information Report with more detailed engineering information. The construction and operational noise and vibration assessment have been updated within this information and are reported in Volume 7: Annex 9.2: Construction Noise and Vibration and Annex 9.3: Operation Noise of the Environmental Statement.	No
Mon_082_010_020623	S44	Email	We do not believe that you will be able to adequately mitigate and shield us from the effects of noise, vibration, dust etc. during construction without significant disruption to ourselves. We have spent a considerable amount of monies and time improving our property over the last 9 years and should onshore substation option 2 be chosen then this will irreparably damage our	Mitigation measures to reduce the risk of dust generated during the construction phase have been recommended to ensure the impact is negligible. These are detailed within section 10.7 of Volume 3, Chapter 9: Noise and Vibration.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			quality of life, our wellbeing, and as a direct consequence our property will be uninhabitable during construction.	The residential property and curtilage has been excluded from the order limits.	
Mon_082_011_020623	S44	Email	As part of your Code of Construction you propose 7 – 7 working Mon – Sat plus 1 hour pre and post mobilisation time. In addition there are likely to be 24 hour works for Piling, HDD, Concrete pour, generators, lighting, security etc. etc. with construction lasting over 3 ½ years and then further periods of commissioning. This will be overbearing, oppressive and intrusive for us. Since we are retired and live in the property 24/7 we will have no respite. Even once built it will continue to deliver disturbance and impact upon us due to our close proximity. o The substation being on a hard, solid platform will allow vibration to travel. o The open aspect that we currently enjoy will continue to mean noise is an issue o Even with mitigation measures as indicated in the Operational Noise Technical Report Vol 22.3 anticipates noise levels of 70 – 85dB during operation of the substation	The noise and vibration impacts associated with the Mona Offshore Wind Project are assessed in Volume 3, Chapter 9: Noise and vibration of the Environmental Statement. Cumulative impacts are also assessed where information on project is publicly available. A Construction Noise and Vibration Management Plan will set out measures to minimise noise. An outline version of this plan is provided with the application, Outline Construction Noise and Vibration Management Plan (Document Reference 26.3). Operational noise limits for the onshore substation are set out in the draft DCO. Operational noise from the onshore substation and noise levels at the closest noise receptors are assessed within Volume 3, Chapter 9: Noise and Vibration of the Environmental Statement.	Yes
Mon_002_030_080623	S42/S44	Email	Section 22 – Noise and Vibration Due to the proximity of construction compounds and working areas to residential areas and individual properties, the Council has concerns the construction phase has the potential to generate adverse noise and vibration. Noise and vibration needs to be fully assessed and abatement plans must be included in the Code of Construction Practice subject of proposed Requirement 9, which should be devised in consultation with the Council's Public Protection department.	An Outline Construction Noise and Vibration Management Plan is included in the DCO application (Document Reference J26.3). The detailed plan will be agreed with the relevant authority prior to construction.	No
Mon_002_031_080623	S42/S44	Email	The Council do not agree to the working hours of 7am -7pm in locations close to residential properties, and working hours should instead be restricted to 8am – 6pm where working areas are close to residential receptors, with no working on Sundays or Bank Holidays. Where exceptional circumstances require construction works to be carried out outside of approved hours of operational, this should be agreed in writing by the local planning authority at least 48 hours in advance and such provision should be embedded in the Requirements (please see comments above on draft DCO Requirements).	application. The proposed working hours have been assessed in the ES. The Outline Communications Plan (Document Reference J26.4) includes details how local authorities and local residents will be informed of any work	No
Mon_002_033_080623	S42/S44	Email	In terms of operational noise from the substation, the noise levels at the closest noise sensitive receptors need to be clearly assessed, and maximum noise levels needs to be clearly defined and embedded in requirements.	Operational noise limits for the onshore substation are set out in the draft DCO. Operational noise from the onshore substation and noise levels at the closest noise receptors are assessed within Volume 3, Chapter 9: Noise and Vibration of the Environmental Statement.	Yes
Mon_002_036_080623	S42/S44	Email	Consideration should be given to the proximity of the Denbighshire Memorial Park and Crematorium. Disruption to the peaceful and tranquil setting will be felt both during construction work and when any building is constructed. Cumulative impacts should also be examined further given the potential for this business to be flanked by substations.		No
Mon_015_009_160623	S42/S44	Email	Noise and vibration As the proposed location of the turbines is so far out, the Principle Environmental Health Officer doesn't see any issue with vibration affecting the residents of Conwy County, however the developer must undertake all mitigation measures to minimise any vibration noise from the piling.	The Applicant notes your response	No
Mon_015_010_160623	S42/S44	Email	With regard to noise, the Principal Environmental Health Officer makes the following comments: 1. the developer is referring to the correct British Standards that would cover and minimise disruption to residents due to the on shore works. 2. the proposed area for bringing the cables onshore is large and is likely to	The Applicant notes your response. The Mona Onshore Development Area has been refined following the statutory consultation.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			have a detrimental effect on residents in Abergele and Pensarn 3. the proposed cable corridor is wide, without the definite route having been decided, it would be difficult for the developer to propose and implement specific mitigation measures to minimise noise, and to a lesser extent dust.		
Mon_015_011_160623	S42/S44	Email	The Principal Environmental Health Officer notes that the PEIR report Volume 3, Chapter 22 has identified noise monitoring at various locations, both long term (LT) and short term (ST) in Conwy and Denbighshire. Only 2 LT and 2 ST locations have been undertaken in Conwy, covering the onshore location. Further discussions will be required with the developer to undertake future noise monitoring at other locations within Conwy.	Further baseline sound monitoring has been undertaken in 2023 primarily at the proposed temporary construction compounds. CBCC were consulted about the proposed locations. The results are reported in Volume 7, Annex 9.1: Baseline sound survey of the Environmental Statement	No
Mon_015_012_160623	S42/S44	Email	No noise monitoring has been undertaken along the proposed cable route. It is noted that the background measurements have been provided for the long term locations (table 22.11 page 16) but the PEIR does not appear to include the results for the short term monitoring locations.	Further baseline sound monitoring has been undertaken in 2023 primarily at the proposed temporary construction compounds. CBCC were consulted about the proposed locations. The results are reported in Volume 7, Annex 9.1: Baseline sound survey of the Environmental Statement	No
Mon_015_013_160623	S42/S44	Email	The background noise levels (night time) in table 22.11 are low and the Principal Environmental Health Officer would expect similar if not lower readings to be attained from monitoring locations along the cable corridor route. It is likely that any proposed construction activities along the cable corridor route will have to be curtailed to between 08:00 and 18:00 Monday to Friday and 08:00 to13:00 on Saturday, with no working on Sundays and bank holidays.	Whilst the Mona Offshore Wind Project considers that the results of the Baseline Sound Survey reported in the Preliminary Environmental Information	No
Mon_131_001_280423	S47	Feedback form	There are enough wind farms in the Irish sea already. The hum they produce are causing me to have sleep disturbances and the hum is constant which I can only escape when I am away from home.	The Applicant notes your response	No
Mon_146_001_260523	S47	Feedback form	There appears to be no community or local benefit to this project. The communities along the proposed route suffer disruption and noise without any apparent compensation. Perhaps the partner organisation could consider funding the electrification of the North Wales coast mainline railway. This would provide a tangible and related benefit to the effected communities.	The applicant notes your response. Project partners will be engaging with loan and regional partners at the appropriate time to design a community benefit fund or similar	No
Mon_149_004_260523	S47	Feedback form	Cable routes will need to be hidden and not disruptive to residents.	The onshore cable route has been refined to avoid impacts to residents where possible. All onshore cables will be buried underground.	Yes
Mon_149_010_260523	S47	Feedback form	it is expected that noise could be problematic for local residents during this construction.	A Construction Noise and Vibration Management Plan will set out measures to minimise noise. An outline version of this plan is provided with the application, Outline Construction Noise and Vibration Management Plan (Document Reference 26.3).	No
Mon_158_023_020623	S47	Feedback form	There will be considerable disruption with noise and vibration during construction. This MUST be evaluated cumulatively with other concurrent energy developments (Awel y Môr, NG extensions and other works, Mares Interconnect, Solar farm). It is a failure and intransigent of BP to just provide indicative figures for BP Mona alone, as Cefn Meiriadog will be affected by many large infrastructure construction projects simultaneously. Residents are described as being highly vulnerable (agreed), have high recoverability (disagreed as mental health will definitely be seriously affected; what measures are used to specify this term?) and be of medium value (what specific measure decides the value of a noise receptor?). You state that CoCP includes a noise management plan including communication with the local community. In reality, there is no real-time mechanism allowing residents to deal with daily problems, leading to residential stress and ill health. The noise will not be 9-5 Mon-Fri!	The noise and vibration impacts associated with the Mona Offshore Wind Project are assessed in Volume 3, Chapter 9: Noise and vibration of the Environmental Statement. Cumulative impacts are also assessed where information on project is publicly available	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_161_005_020623	S47	Feedback form	The cables on the current pylons make loud frying noise in wet damp weather conditions any future pylons and increase in power carried will increase the frying noise considerably. How are you going to stop this noise and interference to electronic equipment?	The Mona Offshore Wind Project will not involve the construction of overhead lines or pylons.	No
Mon_189_003_020623	S47	Consult Online	The noise will impact those nearby and it is too close to St Asaph centre.	The impacts of noise and vibration are assessed in Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement	No
Mon_190_001_020623	S47	Email	If the project was to be in the field directly behind the park it would be a blog on the landscape and the noise and dust etc would cause our static owners no end of distress	The Applicant notes your response. Onshore Substation Option 2 is the final onshore substation location that has been taken forward. Mitigation measures to manage construction impacts including noise and dust are included in the Outline CoCP (document reference J26) and measures to mitigate impacts to the landscape are included in the Outline Landscape and Ecological Management Plan (Document Reference J22).	No



D.25.23 Air quality table of responses



Table D.25. 23: Air quality table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_054_020_010623	S42/S44	Email	Air Quality: NRW (A) have no significant issues with the PEIR. We provide advice regarding some further information/detail required	The Applicant notes your response	No
Mon_054_523_010623	S42/S44	Email	Air Quality: Volume 3, Chapter 23 Air Quality NRW (A) agree with the broad statements that it is mainly the onshore construction activities (and decommissioning activities when they arise) which are likely to have an adverse impact on air quality (offshore activities and onshore operation and maintenance activities are unlikely to impact).	The Applicant notes your response	No
Mon_054_524_010623	S42/S44	Email	NRW (A) notes that Chapter 23 Air Quality rules out the need to consider any offshore impacts. However, we advise that a rationale should be presented and evidence to screen out offshore air quality (AQ)impacts from increased marine vessel traffic during construction, operation, maintenance and decommissioning phases. It is thought the level of traffic will be low enough to screen out, however we advise that evidence should be submitted to justify that decision.	Local Air Quality Management (LAQM) Technical Guidance (TG22) (Defra, 2022) provides the following threshold criteria for determining whether ship movements need to be specifically considered: 'Are there more than 5,000 large shop movements per year, with relevant exposure withing 250 m of the berths and main areas of manoeuvring; or Are there more than 15,000 large ship movements per year, with relevant exposure within 1km of these areas?' The development will generate less than 5,000 vessels a year and therefore impacts arising from marine vessel traffic during construction, operations and maintenance and decommissioning have been scoped out of the air quality assessment.	No
Mon_054_525_010623	S42/S44	Email	The screening approach to heavy duty vehicles (HDV) and light duty vehicles (LDV) traffic is sound and NRW (A) agree with the assessment in the forthcoming Environmental Statement (ES) of 8 of the 23 road links.	The Applicant notes your response.	No
Mon_054_526_010623	S42/S44	Email	NRW (A) agree with the operational and maintenance aspects scoped out of the assessment and justification for the same, in Table 23.17Impacts scoped out of the assessment for air quality.	The Applicant notes your response	No
Mon_054_527_010623	S42/S44	Email	NRW (A)are in agreement with the methodology used to generate the risk of dust impacts matrix in accordance with Institute of Air Quality Management (IAQM)guidance. It is important for the ES to include details of the mitigation to be incorporated around dust impacts to ensure risks are reduced for sensitive ecological receptors from low/ medium to negligible as outlined in Table 23.18 Measures adopted as part of the Mona Offshore Wind Project. The following statement is also welcomed "[the] potential risk of tracked out dust will be considered as part of the Environmental Statement and the air quality study area will be increased to 500m from construction site entrances".	The Applicant notes your response	No
Mon_082_010_020623	S44	Email	We do not believe that you will be able to adequately mitigate and shield us from the effects of noise, vibration, dust etc. during construction without significant disruption to ourselves. We have spent a considerable amount of monies and time improving our property over the last 9 years and should onshore substation option2 be chosen then this will irreparably damage our quality of life, our wellbeing, and as a direct consequence our property will be uninhabitable during construction.	Mitigation measures to reduce the risk of dust generated during the construction phase have been recommended to ensure the impact is negligible. These are detailed within section 10.7 of Volume 3, Chapter 9: Noise and Vibration. The residential property and curtilage has been excluded from the order limits.	Yes
Mon_149_004_260523	S47	Feedback form	Cable routes will need to be hidden and not disruptive to residents.	The onshore cable route has been refined to avoid impacts to residents where possible. All onshore cables will be buried underground.	Yes
Mon_190_001_020623	S47	Email	If the project was to be in the field directly behind the park it would be a blog on the landscape and the noise and dust etc would cause our static owners no end of distress.	The Applicant notes your response. Onshore Substation Option 2 is the final onshore substation location that has been taken forward. Mitigation measures to manage construction impacts including noise and dust are included in the Outline CoCP (Document Reference J26) and measures to mitigate impacts to the landscape are included in the Outline Landscape and Ecological Management Plan (Document Reference J22).	No



D.25.24 Onshore and intertidial ornithology table of responses



Table D.25. 24: Onshore and intertidal ornithology table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_012_001_260423	S47	Email	I was very concerned to read how dismissive the PEIR is of the marine ecology in this location. The repeated use of phrases like 'negligible or minor adverse significance' does not take into account the interconnectedness and complexity of this marine biome. Its damage and destruction throughout the construction, operation and decommissioning phase could irrevocably damage the local ecosystem and disrupt feeding patterns of species below and above the surface of the sea. One such example of this interconnectedness and only briefly mentioned in the PEIR is the last breeding colony of little terns in Wales who nest every year at Gronant. Among other tern species in this vicinity, they rely on sand eels as an important part of their diet to feed their chicks. As with other terns in this area they do feed close to shore, but they also fly further out to sea to dive for sand eels. Their numbers have declined by 50% since the 1980s and now the last remaining colony is managed by Denbighshire Countryside Service. PEIR (Non-Technical Summary 1.7.3.2) states that sand eels have 'important populations and spawning grounds in this area', and yet the report (Vol 2: Ch10) assessed the impact this might have on the little tern colony and its vital food source as not significant. If this development were to proceed, mitigation measures (such as pre-commencement breeding bird surveys) could never reverse the inevitable damage caused to this important food resource and to an already depleted colony. According to the PEIR (Non-technical summary), "most of these impacts result in either negligible, or minor adverse effects, which are not significant in EIA terms' (PEIR, 1.8.9.4).	The applicant thanks the consultee for its detailed comments on the marine ecology of the project and recognises the importance of the queries raised. Technical reports within Volume 6 of the Environmental Statement provide details of the site-specific marine ecology surveys with their results. Detailed assessments have been undertaken throughout the project lifetime inline with EIA regulations and chapters within Volume 2 of the Environmental Statement provide details of the assessment undertaken and the applicants approach to managing and mitigating any potential impacts the project my have on the marine environment.	
Mon_054_008_010623	S42/S44	Email	Intertidal Ornithology: NRW (A) provide advice on some clarifications/corrections required.	Clarification is provided within Volume 7, Annex 4.2: Intertidal ornithology – wintering and migratory birds technical report that two full years-worth of data is to be collected (data collection ending in November 2023).	No
Mon_054_010_010623	S42/S44	Email	Onshore Ornithology: NRW (A) have no significant issues with the PEIR. We provide advice on appropriate mitigation.	The Applicant notes your response	No
Mon_054_366_010623	S42/S44	Email	Intertidal ornithology NRW (A) welcome that site-specific, through the tidal cycle surveys of the intertidal study area related to the cable landfall have been undertaken. We understand these surveys began in December 2021 and are currently ongoing. However, clarification is required as to the intended end date of these surveys, as the information provided in Volume 3, Chapter 24 Onshore and Intertidal Ornithology and Volume 7, Annex 24.2 Intertidal Ornithology Technical Report, is not consistent:	Clarification is provided within Volume 7, Annex 4.2: Intertidal ornithology – wintering and migratory birds technical report that two full years-worth of data is to be collected (data collection ending in November 2023).	No
Mon_054_367_010623	S42/S44	Email	Paragraph 24.4.8.2 of Chapter 24 states: "Surveys conducted within the intertidal ornithology study area commenced in December 2021 and are expected to conclude in November 2023 (two years of data)".	The Applicant notes your response	No
Mon_054_368_010623	S42/S44	Email	Paragraph 1.1.1.7 of Annex 24.2 states: "Surveys started in December 2021 and have been ongoing with a proposed finish date of June 2023".	The Applicant notes your response	No
Mon_054_369_010623	S42/S44	Email	In Annex 24.2, Table 1.1 Qualifying features of the SPAs located within 20km of the Mona Proposed Landfall, it should be noted that: The qualifying features of Liverpool Bay are non-breeding common scoter, red-throated diver, little gull; breeding little tern, common tern; and a waterbird assemblage. Cormorant and red-breasted merganser are not qualifying features in their own right, but are part of the assemblage qualifying feature. For the Dee Estuary Ramsar, the species included in the table as present in nationally important numbers are not qualifying features of the Ramsar site, but are part of the waterbird assemblage which is a qualifying feature.	The listed qualifying features of SPAs located within 20 km of the Mona Landfall are amended for the Environmental Statement. As shown in Table 1.13 of Volume 3, Chapter 4: Onshore and intertidal ornithology of the Environmental Statement.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_054_441_010623	S42/S44	Email	Onshore Ornithology The approach to survey and assessment appears appropriate for the onshore (terrestrial) ornithological components given the habitats within the red line boundary and the nature of the scheme.	The Applicant notes your response	No
Mon_054_442_010623	S42/S44	Email	NRW (A) recommend that a Breeding Bird Protection Plan (BBPP) should be submitted and agreed. This should detail mitigation and working practices to avoid impacts to the ornithological receptors identified, and breeding birds more widely. The BBPP should also provide specific information relating to working practices and any mitigation to ensure no impacts on the two Schedule 1 species (red kite and little ringed plover).	The Outline Code of Construction Practice includes details of the bird protection measures that will be put in place during construction (Document Reference: J26). The Outline Code of Construction Practice will be secured through a requirement of the DCO.	
Mon_054_443_010623	S42/S44	Email	NRW (A) recommend that vegetation clearance should be outside of the breeding season or preceded by pre-commencement surveys for breeding birds, with appropriate mitigation/protection put in place if nesting birds are found.	Such measures are considered in and secured as part of the Outline Code of Construction Practice (document reference: J26).	No
Mon_054_444_010623	S42/S44	Email	There is potential for enhancement measures for birds as part of this scheme, and details of potential measures should be brought forward.	Mitigation and enhancement measures with respect to landscape and ecology are set out the Outline Landscape and Ecology Management Plan (Document Reference J22). In addition, the Outline Code of Construction Practice (Document Reference J26) and the Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7).	No
Mon_061_001_020623	S42	Email	Thank you for consulting the RSPB over the proposal to construct Mona Offshore Wind Farm (the Application). We limit the scope of our comments to ornithology and related matters.	The Applicant notes your response.	No
Mon_061_003_020623	S42	Email	Onshore and intertidal ornithology & Onshore ecology Owing to the acknowledged limitation of ongoing ecological surveys including breeding bird surveys, we will reserve comment until the information is submitted in the ES to inform the assessment.	The Applicant notes your response.	No
Mon_061_004_020623	S42	Email	We note that the project avoids Pensarn SSSI at cable landfall. Furthermore, HDD will be deployed under Llanddulas Limestone and Gwrych Castle Wood SSSI and HDD will be deployed under Ancient Woodland sites.	The Applicant notes your response.	No
Mon_061_005_020623	S42	Email	We trust our comments are of use and look forward to continuing to engage in the consenting processes of the Mona Offshore Wind Farm. The RSPB reserves the right to make further representations in relation to this matter.	The Applicant notes your response.	No
Mon_066_036_020623	S42	Email	We recommend that a Statement of Common Ground (SoCG) is started by the Applicant early within the EPP, to accurately catalogue all areas of agreement for the project and highlight any areas of disagreement. ETG consultation/agreement logs have been successfully used by other projects as the foundation for the SoCG.	The Applicant will develop Statement of Common Ground with all key stakeholders during the examination phase.	No
Mon_066_037_020623	S42	Email	Best Practice Advice for Offshore Wind Natural England has produced a series of documents to provide Environmental Assessments: Best Practice Advice for Evidence and Data Standards for offshore wind farm development in English inshore and offshore waters. The advice is provided in a series of documents which range from baseline characterisation surveys and pre-application engagement, through to expectations at application and post-consent monitoring.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_038_020623	S42	Email	The project is divided into four phases: Baseline characterisation surveys Pre-application engagement and the evidence plan process Data and evidence expectations at examination post-consent monitoring and other environmental requirements.	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No
Mon_066_039_020623	S42	Email	The above link also provides access the Nature Conservation Considerations and Environmental Best Practice for Subsea Cables for English Inshore and UK Offshore Waters. This project provides Natural England and JNCCs joint	Noted. Best practice advice has been followed while drafting the Mona Offshore Wind Project application.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			environmental best practice advice for subsea cable projects in English inshore and UK offshore waters.		
Mon_066_040_020623	S42	Email	It is the expectation that developers follow our Best Practice through the application and consenting process. As such our advice and recommendations to the PEIR are framed around this advice.		No
Mon_066_041_020623	S42	Email	If you have any issues using SharePoint Online, please contact the site owners or contact: REDACTED	The Applicant notes your response.	No
Mon_066_044_020623	S42	Email	Natural England's Structure/Framework for Attributing Risk. The comments provided within this letter and its Annexes have been colour coded using the structure/framework as specified in the risk table in Appendix I of this letter. In this letter, the coloured headings are coded based on the highest risk associated with the topic in question. Natural England would like to highlight that at this stage all comments highlighted as yellow, amber, or red need to be addressed, with the potential for these issues to become more significant if not resolved at application.	The Applicant notes your response.	No
Mon_066_045_020623	S42	Email	Impacts on the Natural Environment–Natural England's Key Concerns Generic Issues - MARKED RED BASED OFF THEIR APPENDIX Natural England highlights that for several receptors, the PEIR is based on incomplete data (offshore ornithology, marine mammals) or refers to additional data collection that is not presented or still to be carried out (physical processes, benthic ecology). Natural England cannot therefore make any conclusive judgements based on this PEIR, including the cumulative/in-combination assessments and the HRA. Accordingly, our advice focuses on the methodology used. We emphasise the need to base the submitted ES on robust datasets that meet (and where appropriate exceed) minimum standards, for example marine mammal and offshore ornithology impact assessments should be based on at least 24 monthly surveys.	The Environmental Statement has been based on robust datasets that meet/exceed minimum standards. For marine mammals and offshore ornithology assessments, two years of aerial survey data is presented and analysed (Volume 2, Chapter 4: Marine mammals chapter; Volume 2, Chapter 5: Offshore ornithology chapter). The benthic and physical processes assessments have been informed by 2022 and 2023 intertidal surveys, and 2021 and 2022 subtidal benthic surveys (Volume 2, Chapter 1: Physical processes chapter; Volume 2, Chapter 2: Benthic subtidal and intertidal ecology chapter).	No
Mon_066_046_020623	S42	Email	We also highlight the risks associated with further data processing to validate the conclusions and having sufficient time to consult pre-application and sufficiently resolve matters prior to submission. We reserve the right to change our comments and position during the ES consultation, subject to the outcome of further data analysis. Furthermore, Natural England seeks confirmation that the timetable set out for DCO submission allows for evidence standards to be met.	Noted. The Applicant confirms that the timetable set out for DCO submission allows for evidence standards to be met.	No
Mon_066_047_020623	S42	Email	Please note that Natural England defer to Natural Resources Wales as the relevant statutory consultee in some instances. This is reflected by the use of a Purple RAG rating in our advice.	The Applicant notes your response.	No
Mon_149_008_260523	S47	Feedback form	Glascoed is known to be the habitat of great crested newts and various other birds and mammals in this area.	A Great Crested Newt Mitigation Strategy is included in the Outline Landscape and Ecological Management Plan (Document Reference J22). A full assessment of the impacts to onshore ecology can be found in Volume 3, Chapter 3 Onshore ecology of the Environmental Statement.	No

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D.25.25 Seascape, landscape and visual resources table of responses



Table D.25. 25: Seascape, landscape and visual resources table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_002_004_080623	S42/S44	Email	Whilst the offshore array has limited significant effects on Denbighshire interests, from a regional perspective, the Council has concerns about the number of significant effects identified in the SLVIA, and the effect an offshore windfarm of the scale proposed would have on regional seascape and landscape character, visual amenity and the regional visitor economy.	The Applicant notes your response	Yes
Mon_002_034_080623	S42/S44	Email	VOLUME 4: ONSHORE AND OFFSHORE CHAPTERS Section 26 – Seascape, Landscape and Visual Resources 26.17 – 26.18 Substation options 2 and 7 The Council has concerns about the long-term landscape impact of the substation options. In particular the impact on views from the Clwydian Range AONB and Offas Dyke Path have been described as negligible given the 6km distance. Further justification for this should be provided and mitigation and compensation considered for impacts on the AONB, recreation and tourism.	The effects on landscape character, visual effects and cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline LEMP (Document J22). Impacts on tourism are considered in Volume 4, Chapter 3: Socio-economics of the Environmental Statement.	No
Mon_002_035_080623	S42/S44	Email	In addition, it is noted that for certain local landscape receptors the impacts from the substations are deemed to be high. This must be compounded by the previous intrusions into the landscape of other large substations. Cumulative impacts in this area cannot be underestimated.	Cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement.	No
Mon_023_001_040523	S47	Email	I am strongly against the proposed project. I live on the coast and all I can see out to sea are wind turbines. They are a blot on the skyline and as far as I am concerned we have enough of them.	Your response has been noted. Visualisations of the array area are presented in Volume 6, Annex 8.6: Seascape and landscape figures - offshore development of the Environmental Statement	Yes
Mon_044_001_290523	S47	Email	Objects to the project based on any encroachment on views from Southport area/Morecambe Bay area.	Private views are not a planning matter (unless effects are over and above substantial adverse). It should be noted that following statutory consultation on the PEIR, the Mona Array Area was revised which resulted in an increase in the minimum distance to the coast of England to 46.5 km. A full assessment of impacts to views as a result of the installation of the turbines is provided in Volume 2, Chapter 8 Seascape and visual resources of the Environmental Statement.	
Mon_044_002_290523	S47	Email	I pay extra Council Tax for my view. Therefore, are you going to compensate me for the loss of my view??????	Private views are not a planning matter (unless effects are over and above substantial adverse). It should be noted that following statutory consultation on the PEIR, the Mona Array Area was revised which resulted in an increase in the minimum distance to the coast of England to 46.5 km. A full assessment of impacts to views as a result of the installation of the turbines is provided in Volume 2, Chapter 8 Seascape and visual resources of the Environmental Statement.	
Mon_044_003_290523	S47	Email	I have worked 45 years and now that I am retired, I DO NOT WANT TO SEE OFFSHORE WIND FARMS WHEN I LOOK OUT TO SEA. I WANT TO SEE THE SEA NOT WHITE POLES STICKING UP HERE THERE AND EVERYWHERE.	Private views are not a planning matter (unless effects are over and above substantial adverse). It should be noted that following statutory consultation on the PEIR, the Mona Array Area was revised which resulted in an increase in the minimum distance to the coast of England to 46.5 km. A full assessment of impacts to views as a result of the installation of the turbines is provided in Volume 2, Chapter 8 Seascape and visual resources of the Environmental Statement.	





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_047_014_300523	S42/S44	Email	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.	The landscape mitigation measures adopted as part of the Mona Offshore Wind Project are outlined in the Landscape and visual resources chapter (Volume 3, Chapter 6) and detailed in the Design Principles Document. The proposed mitigation is shown on the Illustrative Landscape and Ecology Strategy Plan that forms part of the Outline Landscape and Ecology Management Plan (Document Reference J22).	Yes
Mon_054_009_010623	S42/S44	Email	Onshore Advice. Designated Landscapes: NRW (A) are concerned that the SLVIA has underestimated the effects on Designated Landscape receptors. We consider that the proposals are likely to result in significant adverse effects on visual receptors within these designated landscapes and as a result there is the potential for harm to their Special Qualities. We provide advice on further work necessary.	All three NRW (2020) guidance documents were reviewed for the PEIR. However, transcription errors were discovered from the DTI (2005) guidance, therefore methodology in Volume 7, Annex 6.4: Landscape, seascape and visual resources impact assessment methodology of the Environmental Statement reverted to the source guidance on SLVIA (DTI, 2005 and GLVIA3). This is explained with more detail in Volume 6, Annex 8.4: Seascape, landscape and visual impact assessment methodology, of the Environmental Statement. The NRW guidance was also reviewed for the onshore assessment but was found to be relevant primarily to offshore infrastructure.	Yes
Mon_054_010_010623	S42/S44	Email	Onshore Ornithology: NRW (A) have no significant issues with the PEIR. We provide advice on appropriate mitigation.	The Applicant notes your response	No
Mon_054_372_010623	S42/S44	Email	Onshore Advice Designated Landscapes1.8.1 Key Issues NRW (A) advice regarding the Seascape, Landscape and Visual Impact Assessment (SLVIA) relates to the potential impacts on the Isle of Anglesey Area of Outstanding Natural Beauty (AONB), Eryri National Park, and the Clwydian Range and Dee Valley AONB.	The Applicant notes your response	No
Mon_054_373_010623	S42/S44	Email	No components of the Mona Offshore Wind Project are located within these nationally designated landscapes. However, the Offshore Generation Assets (Mona Array Area) would be visible within the seascape setting to the Isle of Anglesey AONB, Eryri National Park, and the Clwydian Range and Dee Valley AONB. The substation within the Onshore Development Area (ODA) would also be visible within the landscape setting to the Clwydian Range and Dee Valley AONB.	The Landscape and visual resources chapter considers the effects of the onshore transmission elements of the Mona Offshore Wind Project on the special qualities of the nationally designated landscape within the study areas for the onshore substation and cable route - the Clwydian Range and Dee Valley NL. The onshore study areas (agreed with NRW) do not include Eryri National Park or Anglesey NL. The effects of the onshore transmission elements of the Mona Offshore Wind Energy Project on the special qualities of the Clwydian Range and Dee Valley NL are considered within the Landscape and visual resources chapter and assessed in detail in Volume 6, Annex 8.5: International and nationally designated landscapes study, of the Environmental Statement.	No
Mon_054_374_010623	S42/S44	Email	The SLVIA concludes there would be no significant effects on any seascape, landscape, or visual receptors as a result of the Mona Array Area either during construction, operation, or decommissioning, and finds no significant effects on the Clwydian Range and Dee Valley AONB nor visual receptors within it as a result of the ODA.	We have considered the Special Qualities of the nationally designated landscapes within Volume 2, Chapter 8 Seascape and Visual Resources of the Environmental Statement. In addition, we have undertaken a further study within 60km of the Mona array, which takes more land within Eryri National Park and the Anglesey NL (the 60km buffer does not include the Clwydian Range NL). This is presented in Volume 6, Annex 8.5: International and nationally designated landscape study - offshore development of the Environmental Statement. The Volume 3, Chapter 6 Landscape and Visual Resources considers the Special Qualities of the nationally designated landscape within the study areas for the onshore substation and cable route - the Clwydian Range and Dee Valley NL (the onshore study areas, agreed with NRW, do not include Eryri	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				National Park or Anglesey NL). Assessment of the potential impact on nationally and internationally designated landscapes is set out in Volume 6, Annex 8.5: International and nationally designated landscape study of the Environmental Statement.	
Mon_054_375_010623	S42/S44	Email	NRW (A) welcome the information provided in the PEIR with respect to SLVIA and appreciate the recent provision of the hardcopies of the A3 Viewpoint Wireframes following the SLVIA Workshop on 28thSeptember 2022. Following receipt of the additional information submitted at PEIR and following further detailed consideration of the proposal against the landscape and visual receptors identified in the PEIR, and our consideration of their sensitivity to change, NRW (A) now consider that significant effects are possible and in relation to certain visual receptors, e.g., along the Anglesey coast, such effects are considered likely. NRW(A) are also concerned that the SLVIA has under-estimated the effects on these receptors. We consider the SLVIA has under-estimated effects due to:	We have considered the Special Qualities of the nationally designated landscapes within the offshore chapter. In addition, we have undertaken a further study within 60km of the Mona array, which takes more land within Eryri National Park and the Anglesey NL (the 60km buffer does not include the Clwydian Range NL). This is presented in Volume 6, Annex 8.5: International and nationally designated landscape study - offshore development of the Environmental Statement. The onshore chapter considers the Special Qualities of the nationally designated landscape within the study areas for the onshore substation and cable route - the Clwydian Range and Dee Valley NL (the onshore study areas, agreed with NRW, do not include Eryri National Park or Anglesey NL). In addition, we have undertaken a further study. Assessment of the potential impact on nationally and internationally designated landscapes is set out in Volume 6, Annex 8.5: International and nationally designated landscape study of the Environmental Statement.	Yes
Mon_054_376_010623	S42/S44	Email	Methodological issues, for example, the thresholds used for effects to be considered significant. •Scope of assessment, for example, excluding consideration of local landscape and seascape areas. Guidance not used to inform design development or consideration of alternatives, for example, not considering NRW guidance on offshore wind farms.	The assessment concluded that there will not be significant cumulative effects on the Special Qualities of the nationally designated landscape within the study areas of the onshore elements of the Mona Offshore Wind Project. The effects of the whole project on the Special Qualities of the nationally designated landscapes within 60km of the Mona Array Area, which takes more land within Eryri National Park and the Isle of Anglesey NL and the Clwydian Range NL have been considered in Volume 6, Annex 8.5: International and nationally designated landscape study of the Environmental Statement). There was found to be a moderate, significant cumulative effect on one of the special qualities of the Eryri National Park of the Mona Array Area, in combination with the Tier 2 offshore wind projects. This is not a significance level that would compromise the integrity of the National Park or compromise the reasons for its designation.	
Mon_054_377_010623	S42/S44	Email	Our detailed comments on the SLVIA below identify potentially significant visual effects in all three designated landscapes, resulting either from the Mona Array Area or from the substation. Potentially significant adverse cumulative visual effects have also been identified in relation to views from the Isle of Anglesey AONB and Eryri National Park. NRW (A)advise that these visual changes have the potential to harm Special Qualities of the designated landscapes, particularly those relating to perceptual and scenic qualities. For instance, Anglesey AONB is predominantly a coastal designation and therefore some of the most important Special Qualities relate to its coastal setting and its appreciation by people on National Trails and Public Rights of Ways. Its Special Qualities include expansive views/seascapes, islands, peace, and tranquillity. All are inherently connected to the sea and therefore susceptible to changes within the wider seascape.	The assessment concluded that there will not be significant cumulative effects on the Special Qualities of the nationally designated landscape within the study areas of the onshore elements of the Mona Offshore Wind Project. The Special Qualities of the nationally designated landscapes are considered within Volume 2, Chapter 8: Seascape and visual resources of the Environmental Statement. In addition, a further study within 60km of the Mona array has been undertaken, which includes more land within Eryri National Park and the Anglesey NL (the 60km buffer does not include the Clwydian Range NL), This is presented in Volume 6, Annex 8.5: International and nationally designated landscape study offshore development of the Environmental Statement. Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement considers the Special Qualities of the nationally designated landscape within the study areas for the onshore substation and cable route - the Clwydian Range and	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				Dee Valley NL (the onshore study areas, agreed with NRW, do not include Eryri National Park or Anglesey NL).	
Mon_054_378_010623	S42/S44	Email	Because the SLVIA has under-estimated the effects of the Mona Array Area, no specific mitigation measures have been considered. The only measure cited in the SLVIA is that the turbines would be painted grey which is a standard measure. NRW (A) advise that without a reduction in the array area and/or a significant reduction in the scale of the turbines, significant and adverse effects on the Special Qualities of the Isle of Anglesey AONB and Eryri National Park are likely to occur as well as effects that are not significant, but nevertheless adverse. This conflicts with the purpose of these landscapes to conserve and enhance natural beauty, as set out in PPW11, which states that National Parks and AONBs are of equal status in terms of landscape and scenic beauty and must both be afforded the highest status of protection from inappropriate developments.	The assessment concluded that there will not be significant cumulative effects on the Special Qualities of the nationally designated landscape within the study areas of the onshore elements of the Mona Offshore Wind Project. The Special Qualities of the nationally designated landscapes are considered within Volume 2, Chapter 8: Seascape and visual resources of the Environmental Statement. In addition, a further study within 60km of the Mona array has been undertaken, which includes more land within Eryri National Park and the Anglesey AONB (the 60km buffer does not include the Clwydian Range AONB). This is presented in Volume 6, Annex 8.5: International and nationally designated landscape study offshore development of the Environmental Statement. The onshore chapter considers the Special Qualities of the nationally designated landscape within the study areas for the onshore substation and cable route - the Clwydian Range and Dee Valley AONB (the onshore study areas, agreed with NRW, do not include Eryri National Park or Anglesey AONB). In addition, we have undertaken a further study. This is an annex to the onshore chapter.	Yes
Mon_054_379_010623	S42/S44	Email	The SLVIA concludes that mitigation measures for the substation are necessary, however, no details have been provided at this stage. Details of mitigation measures will include planting proposals to be submitted later in a Hydrological, Ecological, and Landscape Management Plan (HELMP). The detail of the HELMP and further refinement of the substation design will determine the level of effect on views within the Clwydian Range and Dee Valley AONB.	The landscape mitigation measures adopted as part of the Mona Offshore Wind Project are outlined in the Volume 3, Chapter 6 Landscape and visual amenity of the Environmental Statement and detailed in the Design Principles Document (Document Reference J3). An Outline Landscape and Ecological Management Plan (LEMP) (Document Reference J22) accompanies the Environmental Statement. The Illustrative Landscape and Ecology Strategy Plan will be secured by the Outline LEMP, which will be a requirement of the DCO.	Yes
Mon_054_380_010623	S42/S44	Email	In relation to the Mona Array Area, we advise that further consideration should be given to NRW's evidence base: "Seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance". The evidence base is divided into 3 reports, which should be read together. NRW (A)advise that further work is required to demonstrate how this guidance has been taken into consideration and informed the proposals. Where departing from guidance, justification should be provided.	We did not consider local landscape character areas in relation to the offshore array, as at the distance that they are from shore and in the interests of proportionality a decision was taken to only use the nationally designated landscapes. LANDMAP has been used for the onshore elements of the project. The methodology used for the PEIR did include the 2019 methodology. However, on reviewing the methodology transcription errors were discovered from the DTI (2005) guidance and the methodology reverted to that source guidance and GLVIA3, recognised in the NRW 2019 guidance, as the most appropriate guidance to use. This is explained more fully in Volume 6, Annex 8.4 Seascape, landscape and visual resources impact assessment methodology of the Environmental Statement.	
Mon_054_381_010623	S42/S44	Email	Detailed Comments With reference to Volume 1, Chapter 3 Project Description, comments on the maximum design scenario (MDS) used in the SLVIA are provided below in relation to SLVIA Methodology.	The Applicant notes your response	No
Mon_054_383_010623	S42/S44	Email	Paragraph 4.8.1.3 states that further refinements of the Mona Array Area will take place between PEIR and application submission. As noted above, NRW (A) advise that refinements to the Mona Array Area are necessary to minimise adverse effects on the Isle of Anglesey AONB and Eryri National Park.	Noted. The geographic extent of the Mona Array Area has been revised since PEIR with reductions to the southern and southwestern boundaries that has increased the separation distance from the Anglesey coast.	Yes



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_054_384_010623	S42/S44	Email	Volume 4, Chapter 26: Seascape, landscape and visual resources, Section 1: Introduction and Overarching Matters With reference to Paragraph 26.1.3.1, NRW (A) are satisfied with the SLVIA study area which includes land 50km from the Mona Array Area and 10km from the onshore substation options.	Noted: As agreed by NRW and the Planning Inspectorate. However, we have extended the offshore study area to 60 km within nationally designated landscapes, to provide more information on our conclusions on the Special Qualities of these areas. This is presented in an annexe to the seascape and visual resources chapter.	Yes
Mon_054_385_010623	S42/S44	Email	Table 26.3/ Paragraph 5.9.8 refers to the Overarching National Policy Statement for Energy (NPS EN-1), which sets out a requirement for projects to be designed carefully, taking account of the potential impact on the seascape and landscape. The aim is to minimise harm to the seascape and landscape, providing reasonable mitigation where possible and appropriate. NRW (A) do not consider that sufficient evidence has been provided to demonstrate that seascape, landscape, and visual impacts have been minimised in this case. Further work on this aspect is advised in the Environmental Statement (ES).	Offshore, the geographical extent of the array area has been reduced since PEIR. Onshore, the Onshore Substation parameters have been reduced where possible. An Outline Landscape and Ecological Management Plan (LEMP) (Document Reference J22) accompanies the Environmental Statement. The Illustrative Landscape and Ecology Strategy Plan will be secured by the Outline LEMP, which will be a requirement of the DCO. The outline of the Landscape Strategy and Outline LEMP was discussed with the Design Council for Wales (17 August 2023).	Yes
Mon_054_386_010623	S42/S44	Email	Table 26.4 refers to Welsh National Marine Plan Policy SOC_06: Designated Landscapes but does not reference the wording of the policy or how it will be met. The full wording is provided in Volume 8, Annex 26.1: Seascape, landscape and visual impact assessment planning policy. NRW (A) recommend that attention is given to the wording of SOC_06 and SOC_07, which, regarding Seascapes and Designated Landscapes, notes that significant adverse impacts should be a) avoided, b) where they cannot be avoided, minimised and c) where they cannot be minimised, mitigated. We do not consider that sufficient evidence has been provided to demonstrate that seascape, landscape, and visual impacts have been minimised in this case. Further work on this aspect is advised in the ES.	The Welsh National Marine Plan has been reviewed while drafting both Volume 2, Chapter 8 Seascape and visual resources and Volume 3, Chapter 6 Landscape and visual resources of the Environmental Statement. Offshore, the geographical extent of the array area has been reduced since PEIR. Onshore, the Onshore Substation parameters have been reduced where possible. An Outline Landscape and Ecological Management Plan (LEMP) (Document Reference J22) accompanies the Environmental Statement. The Illustrative Landscape and Ecology Strategy Plan will be secured by the Outline LEMP, which will be a requirement of the DCO. The outline of the Landscape Strategy and Outline LEMP was discussed with the Design Council for Wales (17 August 2023).	Yes
Mon_054_387_010623	S42/S44	Email	The following documents are missing from Table 26.8 'Key desktop reports'. NRW (A) advise they should be included in the ES and used to inform the SLVIA: Dark Skies and Light Pollution in Wales Mapping & accompanying Tranquillity and Place –Dark Skies Report No: 514, NRW • Cynllun Eryri The Snowdonia National Park Partnership Plan 2020 which sets out Special Qualities in detail. • Supplementary Planning Guidance Note Clwydian Range and Dee Valley AONB, 2018 which includes information on landscape types within the AONB. • Anglesey Landscape Strategy. Isle of Anglesey Council Landscape Character Area Update, 2011. • Anglesey Seascape Character Assessment, 2013. • Stages 1 and 2 of the "Seascape & visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance". The evidence base is divided into 3 reports, which should be read together. Only the Stage 3 report is referenced in Table 26.8.	The NP and AONB documentation is included in Volume 6, Annex 8.5: International and nationally designated landscape study - offshore development of the Environmental Statement. Reference has been made to the dark skies, but at the distance from the coast the navigational lighting of the turbines is not considered to have a significant effect. All three NRW (2019) guidance documents were reviewed. However, on reviewing the methodology, transcription errors were discovered from the DTI (2005) guidance, and the methodology used in the Volume 2, Chapter 8 Seascape and visual resources of the Environmental Statement reverted to that source guidance and GLVIA3, recognised in the NRW 2019 guidance as the most appropriate guidance to use. This is explained more fully in Volume 6, Annex 8.4: Seascape, landscape and visual resources impact assessment methodology of the Environmental Statement.	Yes
Mon_054_388_010623	S42/S44	Email	NRW (A) note that the studies in the last two points above are referenced in PEIR Volume 8, Annex 26.2: Seascape and landscape character baseline technical report. NRW (A) have concerns regarding the SLVIA methodology used for the assessment of SLVIA and consider that it may have led to under-reporting of effects.	NRW's comments are noted. All three NRW (2019) guidance documents were reviewed. However, on reviewing the methodology, transcription errors were discovered from the DTI (2005) guidance, and the methodology used in the Volume 2, Chapter 8 Seascape and visual resources of the Environmental Statement reverted to that source guidance and GLVIA3, recognised in the NRW 2019 guidance as the most appropriate	No





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				guidance to use. This is explained more fully in Volume 6, Annex 8.4 Seascape, landscape and visual resources impact assessment methodology of the Environmental Statement.	
Mon_054_389_010623	S42/S44	Email	With reference to the definitions in Table 26.10 Definition of terms relating to the magnitude of impact, the methodology appears to only consider the size or scale of change. NRW (A) advise that, in accordance with Guidelines for Landscape and Visual Impact Assessment Third Edition (GLIVA3), magnitude of impact should also consider the geographical extent of the impact, its duration, and whether it is reversible. We advise that these factors should be reflected in the methodology.	These terms are set out in Volume 6, Annex 8.4 Seascape, landscape and visual resources impact assessment methodology and Volume 7, Annex 6.4 Landscape, seascape and visual resources impact assessment methodology of the Environmental Statement.	No
Mon_054_390_010623	S42/S44	Email	With reference to Table 26.11: Definition of terms relating to the sensitivity of the receptor, the degree of value attributed to a receptor appears to be primarily based on the presence or absence of landscape designations. NRW (A) advise that this approach to valuing landscape does not accord with best practice, including that set out in GLVIA 3 and the Landscape Institute's Technical Guidance Notes (LI TGN)02-21, which recognise that landscape value is not always signified by designation.	This is recognised in Volume 6, Annex 8.4 Seascape, landscape and visual resources impact assessment methodology of the Environmental Statement. However, given the distance from land, the assessment of the array concentrates on nationally designated landscapes and national character areas, as locally designated landscapes and non-designated landscapes do not have the potential to be significantly affected. For the onshore elements of the project, the sensitivity given in the LANDMAP descriptions have been used (see Volume 3, Chapter 6 Landscape and visual resources of the Environmental Statement).	No
Mon_054_391_010623	S42/S44	Email	The threshold for effects to be deemed significant is not clear. Paragraph 26.4.2.7states that effects at substantial or major are deemed significant, and moderate or less are not significant. It does not state whether major/moderate effects are significant. NRW (A) advise that the threshold of substantial or major effects is too high for significant effects, as only the highest magnitude of change to receptors with a high or very high sensitivity would result in these effects. We advise that the methodology should include scope for moderate effects to be considered potentially significant. Research and guidance2indicate that a moderate effect can potentially be significant, and that major-moderate is classified as significant in the vast majority of SVIAs.	We have carefully used moderate to major etc. rather than moderate/major or moderate or major, as SLVIA/LVIA is not a science-based topic and cannot be put into specific categories, due to changing context and location. Hence we use a more appropriate acceptable 'sliding scale'. The moderate to major category has the flexibility to be considered significant. The DTI 2005 guidance considers that the moderate category is primarily considered to be not significant, as set out in Volume 6, Annex 8.4 Seascape, landscape and visual resources impact assessment methodology of the Environmental Statement.	No
Mon_054_392_010623	S42/S44	Email	The MDS used for the SLVIA is based on 68 wind turbines ('Scenario 2' in Volume 1, Chapter 3: Project description, Table 3.6). The justification for using this scenario instead of Scenario 1 for 107 turbines is that Scenario 2 turbines would be taller, albeit only by 31m. These two Scenarios were presented to NRW at a workshop in September 2022, however, no landscape planning advisor was present, and no further advice was given on which represented the worst-case scenario. Having reviewed the comparative layouts and wirelines presented at the workshop, we advise that either Scenario 1 is used for the MDS, included as an alternative development scenario for SLVIA purposes, or further justification is provided for why Scenario 2 is considered to be the worst-case scenario. This is because whilst the horizontal field of view occupied by the turbines and their perceived height is similar between Scenarios 1 & 2, Scenario 1 has a higher number of turbines (39 more than Scenario 2) and this leads to a noticeable increase in the density of development at locations on the north coast of Wales, including within the Isle of Anglesey AONB (e.g. Viewpoint 3). NRW (A)therefore consider that this is likely to be the worst case MDS for SLVIA purposes.		
Mon_054_393_010623	S42/S44	Email	The MDS described in the SLVIA states that the turbines and Offshore Substation Platforms (OSPs)will be attached to the seabed by monopile foundation structures, but the type to be deployed is subject to further investigation. The MDS described in Volume 1, Chapter 3: Project description, includes different foundation types, which may result in different visual impacts. For example, the monopile foundations which are assumed to be modelled in the wirelines have a diameter of 16m, but jacket foundations would be formed of a steel lattice structure which would be up to 40m wide at Lowest Astronomical Tide (LAT). We advise that the ES should explain which foundation type is likely to represent the worst-case scenario for SLVIA purposes and this should be used for the photomontages.	At the distance the wind turbines would be viewed from Wales (28.8 km to the closest point on Anglesey), the foundations would not be visible to observers as they would be over the horizon.	Yes





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Mon_054_394_010623	S42/S44	Email	Volume 4, Chapter 26: Seascape, landscape and visual resources –Section 2: SLVIA of the Mona Offshore Wind Project Generation Assets NRW (A) note the SLVIA assesses high level receptors, such as National Character Areas (NCAs)and Seascape Sensitivity Zones (SSZs) but excludes consideration of local landscape and seascape character areas. We advise that relevant local character areas, such as those identified in the Anglesey Landscape Strategy, 2011 and Anglesey Seascape Character Assessment, 2013, are used as these provide further detail on the landscape/ seascape character of the designations and their Special Qualities.	We have not considered local landscape character areas in relation to the offshore array, given the distance that they are from shore. In the interests of proportionality, a decision was taken to only use the nationally designated landscapes and national landscape character areas. LANDMAP Aspect Areas have been used for the onshore elements of the project.	No
Mon_054_395_010623	S42/S44	Email	Wales 'National Marine Character Areas are referenced in Table 26.15 but not included in the assessment of seascape effects because the effects are deemed not to be significant. The closest National Marine Character Area (NMCA) is 04. Explanation for why there are no significant effects on this NMCA should be included in the ES together with mapping showing the relationship between the proposals and NMCAs.	Assessment covering NMCA 04 has been undertaken through the assessments of SSZ1, 2 and 3 which all overlap with NMCA 04. The SSZ zone boundaries were chosen as they represent the most recent characterization of that area of the sea.	No
Mon_054_396_010623	S42/S44	Email	In relation to Wales Seascape Sensitivity Zones (SSZ) the Mona Array Area is predominantly located in SSZ 2 with a smaller area located in SSZ 5. Both areas are assessed strategically as having medium/low sensitivity to the type of development proposed3. Significant adverse effects during construction, operation, and decommissioning are found in relation to SSZ 2 and SSZ 5. NRW (A) agree that effects would be significant and adverse.	The Applicant notes your response.	No
Mon_054_397_010623	S42/S44	Email	Local seascape character areas are not assessed in the PEIR. NRW (A) advise that these should be included in the ES. Although the Anglesey Seascape Character Assessment is referenced as a relevant study in the landscape baseline appendix, the impacts of the proposed generation assets on these areas are not assessed. These character areas should be used to inform a more comprehensive understanding of AONB Special Qualities and the impacts on these.	No changes of approach are proposed, due to distance from the array. the more complete coverage is given by the national level seascape character areas. Those seascape areas outside the nationally designated landscapes are considered in Volume 2, Chapter 8: Seascape and visual resources of the Environmental Statement. The array is too far from the Welsh coast for undesignated landscape areas to be significantly affected.	
Mon_054_398_010623	S42/S44	Email	National Landscape Character Areas (NLCA) are the only landscape character area receptors in Section 2of the SLVIA. Local landscape character areas identified in published landscape character studies, such as the Anglesey Landscape Strategy, 2011 have not been included. We disagree in Paragraph 26.10.1.40, with NLCA 1 being assessed as having medium/high landscape value. Those parts of the NLCA which will be impacted are all within the AONB and therefore should be considered to have the highest landscape value. We advise that this should be made clear in the ES.	No changes of approach are proposed to those landscape character areas outside the nationally designated landscapes. The Mona Array Area is too far from the Welsh coast for undesignated landscape areas to be significantly affected. Those National Landscape Character Areas within the NL are considered as having a high sensitivity and are assessed as part of the NL, in the relevant sections. The Onshore Substation study area only includes one nationally designated landscape, the Clwydian Range and Dee Valley NL. The onshore assessment uses the detailed LANDMAP Aspect Layers and Aspect Areas. The details of the LANDMAP Aspect Areas are detailed in Volume 7, Annex 6.2: Landscape and seascape character baseline technical report, of the Environmental Statement. LANDMAP is the most detailed character assessment of the Welsh landscape. The effects of both the onshore and offshore infrastructure on the special qualities of the internationally and nationally designated landscapes within the various study areas are assessed in Volume 6, Annex 8.5: Internationally and nationally designated landscapes study, of the Environmental Statement.	No
Mon_054_399_010623	S42/S44	Email	Isle of Anglesey AONB Representative viewpoints (Vps) from within the AONB include Vps 1-4 and Vps 24-28. All viewpoints are assessed as high sensitivity. NRW (A) consider that viewpoints such as these, which are all within the AONB and taken from sensitive locations such as the Wales Coast Path, have the highest level of sensitivity, which is 'very high' within the SLVIA. For example, Vp 2 (Llanlleiana Head) is located on the Wales Coast Path within Access Land/Open Country and the Anglesey AONB, and the current		No





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			view, as described in the SLVIA is an 'attractive seascape view [which] is wild and natural in character'. Yet the SLVIA only assesses the value and sensitivity as high rather than very high.		
Mon_054_400_010623	S42/S44	Email	At all viewpoints above, the SLVIA concludes that during the operational phase the magnitude of change would either be negligible or low. NRW (A) disagree and consider that the magnitude of change at all viewpoints is expected to be at least low and, in some places, medium.	Further study has been undertaken within 60km of the Mona array, which takes more land within Eryri National Park and the Anglesey AONB into consideration (the 60km buffer does not include the Clwydian Range AONB) and includes a review of the visual Special Qualities. This is considered within Volume 6, Annex 8.5: International and nationally designated landscape study of the Environmental Statement. The landscape and visual resources chapter considers the visual Special Qualities of the nationally designated landscape within the study areas for the onshore substation and cable route - the Clwydian Range and Dee Valley AONB (the onshore study areas, agreed with NRW, do not include Eryri National Park or Anglesey AONB).	
Mon_054_401_010623	S42/S44	Email	For offshore turbines with a tip height of 324m, 43 km is an approximate buffer distance for an average low magnitude of change within AONBs. All SLVIA viewpoints above are within this distance and the Array is 28 km at its closest point to the AONB. Combined with a high sensitivity receptor, a low magnitude of effect is expected to result in an effect of 'moderate' significance, which NRW (A) advise can potentially be significant.	All three NRW (2019) guidance documents were reviewed, including one that sets out heights and distances of turbines relating to different magnitude, sensitivity and significance of effects. SLVIA is not a scientific discipline and so magnitude, sensitivity and effects do not readily fall into different categories as the context changes. Also, on reviewing the NRW methodology, which drew on DTI (2005) guidance, transcription errors were noted. Therefore, the methodology used in the Environmental Statement chapter reverted to that source guidance as well as GLVIA3 (recognised in the NRW 2019 guidance, as the most appropriate assessment guidance to use). This is explained more fully in the seascape, landscape and visual resources impact assessment methodology annex to the seascape and visual resources chapter. The DTI guidance considers that most 'moderate' significance of effects will not be significant.	No
Mon_054_402_010623	S42/S44	Email	Furthermore, 32.4 km is an approximate buffer distance for an average medium magnitude of change within AONBs. Vp 2 (33km), Vp 3 (30.5km), Vp 24 (31km), Vp 25 (32km) and Vp 28 (33km) are within or close to this distance. Other viewpoints such as Vp 4 (35km), Vp 26 (35km), and Vp 27 (36km) are also close. NRW (A) advise that a medium magnitude of change is likely to result in an effect of 'major-moderate' significance within the AONB. Research and guidance indicate that major-moderate is classified as significant in the vast majority of SLVIAs.	All three NRW (2019) guidance documents were reviewed, including one that sets out heights and distances of turbines relating to different magnitude, sensitivity and significance of effects. SLVIA is not a scientific discipline and so magnitude, sensitivity and effects do not readily fall into different categories as the context changes. Also, on reviewing the NRW methodology, which drew on DTI (2005) guidance, transcription errors were noted. Therefore, the methodology used in the Environmental Statement chapter reverted to that source guidance as well as GLVIA3 (recognised in the NRW 2019 guidance, as the most appropriate assessment guidance to use). This is explained more fully in the seascape, landscape and visual resources impact assessment methodology annex to the seascape and visual resources chapter. The DTI guidance considers that most 'moderate' significance of effects will not be significant.	No
Mon_054_403_010623	S42/S44	Email	NRW (A) advise that judgements on visual receptors within the AONB are re-examined. Particularly as there appear to be inconsistencies and errors. For example, at Vp 3 (Mynydd Eilian) the SLIVA states in Section 26.10.3.35 that "the impact will affect views/visual amenity directly" but then concludes "The magnitude of impact is therefore considered to be negligible". The two statements are not compatible. In Section 26.10.3.37 the SLVIA states that the development would be located 42km offshore from Vp 3, but it is understood Vp 3 is located 30.5km from the closest turbines.	Minor inconsistences have been corrected in the Environmental Statement. No changes of approach are proposed to those areas outside the nationally designated areas. The array is too far from the Welsh coast for undesignated landscape areas to be significantly affected. Land within nationally designated landscapes are considered in more detail in additional annexes	No





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				to both the offshore and the onshore Environmental Statement chapters.	Í
Mon_054_404_010623	S42/S44	Email	Considering the above, NRW (A) do not agree with the finding in Section26.10.1.66 that the magnitude of change to Anglesey AONB Special Qualities is 'negligible at most' which is defined in the SLVIA as "Where proposed changes would have an indiscernible effect on the character of an area". Further, this contradicts Section 26.10.1.66 which finds it would be low to negligible. NRW (A) do not agree that the overall effect is 'negligible to minor adverse at most'. We consider that this is an underestimation. The scale and nature of the development will make it noticeable and will focus attention on it. Sea views are the key focus in the predominantly coastal AONB, many of which are currently empty and unimpeded by development (e.g., Vp 2), apart from the occasional transient ship	We stand by our approach and conclusions. However, we have undertaken a further study within 60km of the Mona array, which takes more land within Eryri National Park and the Anglesey AONB into consideration (the 60km buffer does not include the Clwydian Range AONB) and includes a review of the visual Special Qualities. This is an annex to the seascape and visual resources chapter.	
Mon_054_405_010623	S42/S44	Email	NRW (A) disagree in Section 26.10.1.53, with Public Rights of Way Network (PRoW) being scoped out of the Special Qualities of relevance to the SLVIA. Viewpoints used in the SLVIA include locations along the PRoW network on Anglesey, and the Mona Array Area is expected to impact adversely on the visual amenity of people using the PRoW network.	A further study of the Special Qualities, including views, within 60km, of the Mona array has been undertaken, which takes more land within Eryri National Park and the Anglesey AONB into consideration (the 60km buffer does not include the Clwydian Range AONB) and includes a review of the visual Special Qualities. This is provided within Volume 6, Annex 8.5: International and nationally designated landscape study of the Environmental Statement. Individual consideration of views from the Wales Coast Path, within the AONB are considered within this chapter.	Yes
Mon_054_406_010623	S42/S44	Email	NRW (A) disagree with the finding in Section 26.10.1.63 that Special Qualities of the Anglesey AONB have only high value. These Qualities are of the highest landscape value, which in the SLIVA is very high.	We stand by the methodology used. This methodology/distinction is a proven approach as it allows to differentiate between non-designated, locally designated, nationally designated and internationally designated landscape. Only internationally designated landscapes fall into the very high category.	No
Mon_054_407_010623	S42/S44	Email	Eryri National Park Representative viewpoints from within Eryri National Park include Vp 6 and Vps 29-33. All except Vp 6 are assessed as high sensitivity. Vp 6 is assessed as very high. NRW(A) advise that in general, viewpoints from promoted routes such as the Wales Coast Path or Cambrian Way within designated landscapes have the highest levels of value, and overall sensitivity to changes within their visual settings. Where lower levels of sensitivity are identified, the reasoning for this should be clear. This information together with the distances from the development should be added to the summary tables in Volume 8, Annex 26.3: Visual baseline technical report.	The Wales Coast Path is not a National Trail. The 'Very High sensitivity category is reserved for National Trails crossing a nationally designated landscape, e.g., Offa's Dyke Path within the Clwydian Range and Dee Valley AONB.	No
Mon_054_408_010623	S42/S44	Email	The SLVIA concludes that at all viewpoints above the magnitude of change would be low/negligible and all except Vps 6 and 30 would experience a minor adverse effect overall. For Vp 30 the effect is negligible to minor and for Vp 6 it is minor to moderate. We consider that the magnitude of change at many of the above viewpoints is expected to be at least low.	Increased elevation of a VP location will give a more open view and hence a higher impact. That is the reason for the higher categories given to some VPs.	No
Mon_054_409_010623	S42/S44	Email	For offshore turbines with a tip height of 324m, 43km is an approximate buffer distance for an average low magnitude of change within National Parks. Vps 30-33 (35-40km) are all within this range and Vp 29 is close to this range at 44km. Combined with a high sensitivity receptor, a low magnitude of effect is likely to result in an effect of 'moderate' significance. Research and guidance indicate that a moderate effect can potentially be significant, especially when considered in combination i.e., multiple viewpoints affected along a public footpath or promoted route.	Including one that sets out heights and distances of turbines relating to different magnitude, sensitivity and significance of effects. SLVIA is not a scientific discipline and so magnitude,	No





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				will not be significant. A further study of the Special Qualities, including views, within 60km, of the Mona array has been undertaken, which takes more land within Eryri National Park and the Anglesey AONB (the 60km buffer does not include the Clwydian Range AONB) and includes a review of the visual Special Qualities. This is an annex to the seascape and visual resources chapter. Individual consideration of views from the Wales Coast Path, within the AONB are considered within the chapter.	
Mon_054_410_010623	S42/S44	Email	With reference to Section 26.10.1.72.4, Inspiration for the arts is a special quality of Eryri National Park and should be referenced.	A further study of the Special Qualities, including views, within 60km, of the Mona array has been undertaken, which takes more land within Eryri National Park and the Anglesey AONB (the 60km buffer does not include the Clwydian Range AONB) and includes a review of the visual Special Qualities. This is an annex to the seascape and visual resources chapter. Individual consideration of views from the Wales Coast Path, within the AONB are considered within the chapter.	Yes
Mon_054_411_010623	S42/S44	Email	As outlined above, NRW (A) advise that local landscape character assessments are considered in the ES. All Vps except Vp 6 are in Landscape Character Area (LCA)1: Ucheldir y Gogledd which cites long views across the coast and out to sea as a key characteristic. A specific 'force for change' is "Offshore wind turbines visible from the LCA impacting on the tranquillity and remoteness of the landscape". This detailed information has not been considered in the SLVIA for the Mona Array Area but should be in the ES.	Minor inconsistences have been corrected in the ES. No changes of approach are proposed to those areas outside the nationally designated areas. The array is too far from the Welsh coast for undesignated landscape areas to be significantly affected. Land within nationally designated landscapes are considered in more detail in additional annexes to both the seascape and visual resources and the landscape and visual resources Environmental Statement chapters.	No
Mon_054_412_010623	S42/S44	Email	NRW (A) disagree with the finding in Section 26.10.1.81, that Special Qualities of Eryri National Park have only high value. These Qualities are of the highest landscape value, which in the SLVIA is very high.	The methodology/distinction applied allows to differentiate between non-designated, locally designated, nationally designated and internationally designated landscape. Only internationally designated landscapes fall into the very high category.	No
Mon_054_413_010623	S42/S44	Email	Considering the above, NRW (A) do not agree with the finding in Section 26.10.1.66 that the magnitude of change to Eryri National Park Special Qualities, which include its diverse landscapes and seascapes and beautiful coastal settings, is negligible. NRW (A) advise that due to adverse impacts on views within the park, the magnitude of change is expected to be greater than negligible and that the overall effect is expected to be greater than 'negligible/minor at most'.	We stand by our approach and methodology. However, a further study of the Special Qualities, including views, within 60km, of the Mona array has been undertaken, which includes more land within Eryri National Park and the Anglesey AONB (the 60km buffer does not include the Clwydian Range AONB) and includes a review of the visual Special Qualities. This is an annex to the seascape and visual resources chapter. Individual consideration of views from the Wales Coast Path, within the AONB are considered within this chapter.	No
Mon_054_414_010623	S42/S44	Email	Clwydian Range and Dee Valley AONB Representative viewpoints for the offshore components from within the Clwydian Range and Dee Valley AONB are Vps 10, 11, and 39. All are assessed as high sensitivity (see comments above). The magnitude of change is assessed as negligible at Vps 10 & 11, and low/negligible at Vp 39. The overall effects are negligible to minor at Vps 10 & 11, and minor at Vp 39. NRW (A) note that at all three viewpoints the turbines would be seen behind existing offshore turbines (the 'North Wales offshore wind farm cluster'). Due to its location 'behind' the North Wales offshore wind farm cluster, we consider that the Mona Array Area is unlikely to result in significant adverse visual effects or effects on Special Qualities, but adverse effects are likely, particularly because of cumulative impacts (see below).	Noted, however it should also me noted that the Clwydian Range and Dee Valley AONB does not lie within the 50 km, or indeed the extended 60 km, study area from the reduced geographical extent of the array.	No
Mon_054_415_010623	S42/S44	Email	Cumulative Effects The SLVIA concludes in Section 26.13.4.32, that no visual receptors in the SLVIA study area are likely to be significantly affected cumulatively by the Mona Offshore Wind Project together with	Noted, however it should also me noted that the geographical extent of the array has been reduced.	No





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			existing development projects. This includes potential sequential effects on users of National Trails and roads. The SLVIA reasons that 14km is the minimum separation distance between the North Wales offshore wind farm cluster and the Mona Array and is 'sufficient to prevent any significant sense 'filling' of an area or incremental change from successive individual developments'.		
Mon_054_416_010623	S42/S44	Email	NRW (A) consider that incremental change would be noticeable from viewpoints in Eryri such as at Vp 33 (Conwy Mountain summit), where the gap between Mona and the North Wales offshore wind farm cluster would appear small due to viewing angles. The Mona Array Area would extend the field of view affected by offshore wind turbines. The cumulative effect is likely to be small, but it would not be negligible.	Views from nationally designated areas have been reviewed in light of the revised turbine height and reduction in geographical extent of the array area.	Yes
Mon_054_417_010623	S42/S44	Email	At locations within the Clwydian Range and Dee Valley AONB, such as Vp 39 from Offa's Dyke, the Mona Array would be seen behind the North Wales offshore wind farm cluster, appearing as a wider extension to it. NRW (A) advise that the cumulative effect is likely to be small, but it would not be negligible.	Noted, however it should also me noted that the Clwydian Range and Dee Valley AONB does not lie within the 50 km, or indeed the extended 60 km, study area from the reduced geographical extent of the array.	No
Mon_054_418_010623	S42/S44	Email	At viewpoints with Anglesey AONB, the Mona Array is not expected to result in any significant cumulative effects in combination with the North Wales offshore wind farm cluster due to the distance of separation between visual receptors and the existing cluster.	Noted, however it should also me noted that the geographical extent of the array has been reduced.	No
Mon_054_419_010623	S42/S44	Email	In Section 26.13.7.8, NRW (A) agree with the SLVIA where it recognises the significant increase in influence of offshore wind turbine development on the north coasts of Anglesey that could result from Awel y Môr. However, we disagree that the cumulative effect of Awel y Môr and the Mona Array on the most sensitive locations, such as National Trails within Anglesey, would be "moderate adverse at most" which is based on a medium/small magnitude of change.	We stand by our approach and methodology. However, a further study of the Special Qualities, including views, within 60km, of the Mona array has been undertaken, which includes more land within Eryri National Park and the Anglesey AONB (the 60km buffer does not include the Clwydian Range AONB) and includes a review of the visual Special Qualities. This is an annex to the seascape and visual resources chapter. Individual consideration of views from the Wales Coast Path, within the AONB, are considered within this chapter.	Yes
Mon_054_420_010623	S42/S44	Email	In relation to Awel y Môr, NRW (A) advise that people using the Wales Coast Path would experience both combined and sequential cumulative impacts. At Vp 28 (Penmon Point), the Mona Array and Awel y Môr would be seen overlapping, with each extending the horizontal field of view affected by the other. Elsewhere within Anglesey, for example at Vp 3 (summit of Mynydd Eilian), the gap between the two developments would appear small and offshore wind turbine development would be seen across a large horizontal field of view in a location where offshore views are unaffected by development (with Walney too far to significantly affect views). We advise that at locations such as Vps 28 and 3, the cumulative effect would be greater than the effect of the Mona Array Area in isolation, and it is likely to be significant.	The geographical extent of the Mona array has been reduced. The revised photomontages and degrees illustrate and quantify the change. The impact of the Mona array will be less than the existing North Wales offshore wind farms, due to the distance from the Wales coast and the changeable meteorological conditions associated with distance.	Yes
Mon_054_421_010623	S42/S44	Email	NRW (A) advise that as a result of both schemes in combination, people will have to travel ever further west along the north coast of Wales to be afforded coastal views unaffected by wind turbine development.	Views from the nationally designated areas are considered in Volume 6, Annex 8.5: International and nationally designated landscape study - offshore development of the Environmental Statement	No
Mon_054_422_010623	S42/S44	Email	NRW (A) advise that a cumulative Zone of Theoretical Visibility (ZTV)analysis for the Wales Coast Path should be included in the ES. This should highlight the route of the Path and be supported by more detailed 'sectional' cumulative and non-cumulative analysis.	We believe that our analysis using representative viewpoints is sufficient to give a comprehensive understanding of the cumulative impacts on receptors using this path.	No
Mon_054_423_010623	S42/S44	Email	Volume 4, chapter 26: Seascape, landscape and visual resources –Section 3: SLVIA of the Mona Proposed Onshore Development Area Clwydian Range and Dee Valley AONB The proposed onshore substation is a substantial project with the MDS providing for up to 4 main buildings, each up to 20m tall, 140m long and 80m wide, with an 8m wide permanent access road up to 1.2km in length. The MDS footprint for the substation is 12.5 hectares of which 5.7ha would be impermeable surface. The MDS for the substation construction compound is 25ha and it is expected to take up to 33 months to construct.	The MDS for the onshore substation has been refined for the Environmental Statement. Please refer to Volume 1, Chapter 3: Project Description of the Environmental Statement for details of the onshore substation.	Yes





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Mon_054_424_010623	S42/S44	Email	Two options for the location of the substation are assessed within the PEIR. Both are located southwest of St. Asaph. "Option 2" is south of the Bodelwyddan 400kV substation and "Option 7" is east of the Bodelwyddan 400kV substation.	The final location of the onshore substation (Option 2) has been assessed in the Environmental Statement. Please refer to Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement for the site selection process associated with the selection of the final onshore substation location for the purposes of the DCO application.	Yes
Mon_054_425_010623	S42/S44	Email	NRW (A)agree with the 10km study area used for each substation. Both study areas include parts of the Clwydian Range and Dee Valley AONB, which at its closest point is approximately 5km east of Option 7 and 6km east of Option 2.	Onshore Substation Option 7, closest to the AONB, has not been taken forward. Only Onshore Substation Option 2 is assessed in Volume 3, Chapter 6: Landscape and Visual Resources of the Environmental Statement.	No
Mon_054_426_010623	S42/S44	Email	Representative viewpoints from within the AONB for Option 2 are Vps 2.12 and 2.13. Representative viewpoints for Option 7 are Vps 3.9 and 3.10. All are located on Offa's Dyke Path (National Trail). NRW (A)agree with the SLVIA that receptors at these locations have very high sensitivity.	PEIR substation location Option 7 has not been taken forward. The assessment of the visual effects of the onshore substation taken forward to Environmental Statement (PEIR Option 2) is at section 6.7 of Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the onshore substation buildings, as well as micro-siting the onshore substation platform. The impact on the landscape setting of the Clwydian Range and Dee Valley NL and on visual receptors using the Offa's Dyke Path within the NL have also been reduced. Photomontages of the Mona onshore substation are presented in Volume 7, Annex 6.5: Landscape figures – onshore development of the Environmental Statement. The landscape mitigation measures adopted as part of the Mona Offshore Wind Project are outlined in Table 6.19 and detailed in the Design Principles Document (Document reference J3). The proposed mitigation is shown on the Illustrative Landscape and Ecology Strategy Plan (Figure A.6.4 of Appendix A). An outline LEMP (Document reference J22) accompanies the application. A detailed study of the effects on the special qualities of the Clwydian Range and Dee Valley NL is in Volume 6, Annex 8.5: International and nationally designated landscapes study of the Environmental Statement. NPS EN-1, paragraph 5.10.13 'all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites', paragraph 5.10.26 states that 'reducing the scale of a project can help to mitigate the visual and landscape effects' 'however, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function'.	
Mon_054_427_010623	S42/S44	Email	Offa's Dyke Path is referenced as a component of the AONB's Special Qualities (under access, recreation and tourism)7. Supplementary Planning Guidance (SPG)Policies relevant to this quality include ensuring that the attractiveness of the AONB's landscape and views as a primary basis for the area's tourism are retained. Safeguarding panoramic views and tranquillity are also referenced under the landscape character and quality Special Quality. These matters have not been addressed in the PEIR as SPG. NRW (A) note that the Clwydian Range and Dee Valley AONB, 2018 is not referenced, but should be.	The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform. The impact on the landscape setting of the Clwydian Range and Dee Valley NL and on visual receptors using Offa's Dyke Path within the NL has also reduced. The effects on people using the Offa's Dyke Path National Trail is undertaken in Volume 3, Chapter 6: Landscape and Visual Resources. The effect on the Offa's Dyke Path as a special quality of the NL is undertaken in Volume 6,	





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				Annex 8.5: International and nationally designated landscapes study. The findings are also within the chapter.	
Mon_054_428_010623	S42/S44	Email	NRW (A)advise there is an inconsistency in Section 26.17.6.146which states the sensitivity of the receptor is high. It is assumed to be a typo, as the sensitivity for this receptor is stated elsewhere as 'very high'.	Noted. This inconsistency has been corrected for the submission of the Environmental Statement.	No
Mon_054_429_010623	S42/S44	Email	The SLVIA concludes that the magnitude of change at the above viewpoints would be negligible but that the adverse effects would be slightly greater "minor to moderate" at Vps 3.9 and 3.10 (Option 7) versus "minor adverse" at Vps 2.12 and 2.13. It is assumed this difference is due to the difference in distance of Option 2 and 7 from the AONB, with Option 7 being slightly closer to the AONB.	PEIR onshore substation location Option 7 has not been taken forward. The assessment of the visual effects of the onshore substation taken forward (PEIR Option 2) is in Volume 3, Chapter 6: Landscape and Visual Resources of the Environmental Statement. A detailed study of the effects on the special qualities of the Clwydian Range and Dee Valley NL is in Volume 6, Annex 8.5: International and nationally designated landscapes study of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-sited the substation platform, to avoid as many landscape elements as possible. The impact on the landscape setting of the Clwydian Range and Dee Valley NL and on visual receptors using the Offa's Dyke Path within the NL have been reduced from those assessed in the PEIR. Photomontages of the Mona onshore substation are presented in Volume 7, Annex 6.5: Landscape figures – onshore development of the Environmental Statement. The landscape mitigation measures adopted as part of the Mona Offshore Wind Project are outlined in Volume 3, Chapter 6: Landscape and Visual Resources and detailed in the Design Principles Document (Document Reference: J22). The proposed mitigation is shown on the Illustrative Landscape and Ecology Strategy Plan. An outline LEMP accompanies the Environmental Statement. NPS EN-1, paragraph 5.10.13 'all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites', paragraph 5.10.26 states that 'reducing the scale of a project can help to mitigate the visual and landscape effects' 'however, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function'.	
Mon_054_430_010623	S42/S44	Email	NRW (A)disagree with the conclusion that the magnitude of change at these viewpoints during operation of the substation is negligible. The SLVIA definition of which is "Very slight change in visual baseline (i.e. pre-development view) —change barely distinguishable from the surroundings. Composition and character of view substantially unaltered".8	Noted - As both the Mona Array Area and the Mona Onshore Substation have reduced in size, a review of all impacts (and effects) has been undertaken within Volume 3, Chapter 6: Landscape and Visual Resources.	Yes
Mon_054_431_010623	S42/S44	Email	Draft photomontages have been prepared from Vps3.9 and 3.10. Although not intended to be true to life, these draft images indicate that the substation is likely to be noticeable as a large and distinctly new industrial feature in the landscape. Views from these locations currently provide an outlook across a predominantly rural and attractive landscape, which provides a sympathetic and coherent setting to the AONB and Offa's Dyke Path. The substation would be visible within this rural context. Receptors at this location are likely to take an interest in the view towards the substation as the mountains of Eryri are visible in the distant background. With reference to the SLVIA definitions of visual change9, NRW (A) advise that the substation is expected to have at least a small magnitude of change, which is defined in the SLVIA as a "Minor change to the visual baseline (i.e. pre-development view) –change would be distinguishable from the surroundings whilst view composition and character would be similar to the pre-change circumstances".		No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_054_432_010623	S42/S44	Email	NRW (A) advise that a small change to a receptor with very high sensitivity would result in at least a moderate/major adverse effect, which we consider to be significant.	Noted - As both the Mona Array Area and the Mona Onshore Substation have reduced in size, a review of all impacts (and effects) has been undertaken. Text to clarify this approach to 'moderate' effects is included in Volume 3, Chapter 6: Landscape and Visual Resources, and the corresponding section in Volume 2, Chapter 8: Seascape and visual resources.	Yes
Mon_054_433_010623	S42/S44	Email	The SLVIA finds that mitigation proposals would reduce the effects at Vps 2.12, 2.13, 3.9, and 3.10 to negligible/minor adverse by Year 15. However, no detailed mitigation proposals have been submitted in the PEIR. Table 26.26 states that mitigation proposals for the onshore substation will include planting. The details of which will be set out in a Hydrological, Ecological, and Landscape Management Plan (HELMP). The extent of the planting is indicated on the photomontages. NRW (A) reserve judgement on the potential success of this mitigation until the HELMP has been submitted. However, we advise that itis likely to be difficult to entirely screen the substation in views from Offa's Dyke Path at Vps 2.12, 2.13, 3.9, and 3.10 due to these locations being considerably more elevated than the substation site. Detailed design measures, including colour selection for built elements will therefore be an important consideration and we note the applicant proposes to submit a Substation Design Principles Statement as part of the DCO that will address this aspect. We advise that views from Offa's Dyke are used to inform this Statement.	An Illustrative Landscape and Ecology Strategy has been prepared as part of the Outline Landscape and Ecological Management Plan (Document Reference: J22). The Strategy was discussed with the Design Council for Wales, NRW and Denbighshire County Council at the Onshore Ecology and Landscape Expert Working Group in December 2023.	No
Mon_054_434_010623	S42/S44	Email	On the basis that Option 2 is further away from the AONB than Option 7, we provisionally advise that Option 2 is likely to be preferable from an AONB perspective. However, the ground modelling/final contours, any local restrictions on mitigation proposals, and the local landscape considerations will also need to be taken into consideration.	Onshore Substation Option 2 is the final onshore substation location that has been taken forward. The NRW input into this decision-making is detailed in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives.	No
Mon_054_435_010623	S42/S44	Email	Volume 4, chapter 26: Seascape, landscape and visual resources –Section 4: Other Effects and Summary NRW (A) acknowledge the Next Steps outlined in Section 26.30, including further fieldwork to capture winter photography of the Mona Onshore Substations, night-time photography to inform the assessment of the night-time effects, which will be completed in the ES and the preparation of photomontages.	Onshore photography was finalised, and further photography added, as well as missing winter / summer photography, once the final onshore substation location was selected. Night-time photography was undertaken to assess the effects of the Mona offshore generation and transmission assets. There will be no permanent lighting at the Mona onshore substation, therefore no night-time photography has been undertaken for the onshore transmission assets.	No
Mon_054_436_010623	S42/S44	Email	NRW (A) advise that photomontages for the offshore turbines should be prepared in accordance with NatureScot Visual Representation of Wind Farms Guidance, 2017 and Landscape Institute Technical Guidance Note 06/19 Visual representation of development proposals.	Night-time photomontages have been prepared and considered within Volume 2, Chapter 8: Seascape and visual resources of the Environmental Statement. The photomontages are presented in Volume 6, Annex 10.6: Seascape visualisations of the Environmental Statement	No
Mon_054_437_010623	S42/S44	Email	Volume 8, Annex 26.3: Visual baseline technical report NRW (A) advise that some of the baseline photography appears to have been taken in unfavourable conditions with offshore visibility affected by mist or haze. Baseline photography should ideally be taken when clear skies are present. This is important for offshore turbines where the key requirement is that the turbines are rendered with sufficient contrast against the sky. It is possible that some photography will need to be retaken for the purposes of photomontage preparation. High resolution versions of the final photomontages should be made available.	A number of photographs have been retaken for the purposes of better representation and photomontage preparation. High resolution versions of the final photomontages are presented in Volume 6, Annex 8.6: Seascape visualisations on the Environmental Statement.	No
Mon_054_438_010623	S42/S44	Email	When viewed on screen at 100%-page size, the size of existing turbines in some of the baseline photographs in Volume 8, Annex 26.3Visual Baseline Technical Report (for example 39) appear smaller than in the corresponding baseline wirelines attached to Volume 4, Chapter 26. NRW (A)advise this issue is checked and rectified as necessary.	The visualisations have been revised in response to the refinement of the extent of the array and the change in turbine height. High resolution versions of the final photomontages are presented in Volume 6, Annex 8.6: Seascape visualisations on the Environmental Statement.	No
Mon_054_439_010623	S42/S44	Email	Representative viewpoint numbers on Figures 1.2 and 1.4 do not correspond with viewpoint numbering elsewhere.	Viewpoint numbering and cross referencing has been reviewed and updated across the Environmental Statement as relates to seascape. Nationally designated landscapes are identified on ZTVs within	No





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			Nationally designated landscapes should be identified on ZTVs e.g. Figures 1.2and 1.4. Volume 8 Annexes 26.1 -26.4.	Volume 6, Annex 8.5: International and nationally designated landscape study - offshore development of the Environmental Statement.	
Mon_054_440_010623	S42/S44	Email	NRW (A)note the above documents regarding SLVIA, which, where relevant have been referenced in the comments above. NRW (A)have no further comments at this stage.	The Applicant notes your response.	No
Mon_065_001_020623	S44	Email	Objection –potential impact to ancient woods and trees	The Mona Onshore Development Area has been refined following the statutory consultation, impacts to ancient woodland and veteran trees have been avoided where possible. Where this has not been possible (for example at Llandduals Limestone and Gwrych Castle Wood) the project has committed to using trenchless techniques to avoid impacts (as set out in Volume 5, Annex 4.3: Onshore Crossing Schedule of the Environmental Statement). Further details including assessment of impacts and proposed mitigation are detailed in Volume 3: Chapter 3 Onshore Ecology and Volume 3, Chapter 6 Landscape and Visual Resources of the Environmental Statement.	
Mon_065_002_020623	S44	Email	As the UK's leading woodland conservation charity, the Woodland Trust aims to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering over 30,000 hectares and we have over 500,000 members and supporters. We are an evidence-led organisation, using existing policy and our conservation and planning expertise to assess the impacts of development on ancient woodland and ancient and veteran trees. Planning responses submitted by the Trust are based on a review of the information provided as part of the consultation.	The Applicant notes your response	No
Mon_065_003_020623	S44	Email	The Trust holds concerns regarding the proposed route alignment corridor on the basis of potential deterioration and detrimental impact to a number of ancient woods and trees. Please see the appended table at the bottom of the document (Annex 1) for the woods and trees in question.	The Mona Onshore Development Area has been refined following the statutory consultation and the majority of woodland blocks have now been avoided. Where this has not been possible (for example at Llandduals Limestone and Gwrych Castle Wood) the project has committed to using trenchless techniques to avoid impacts (as set out in Volume 5, Annex 4.3: Onshore Crossing Schedule of the Environmental Statement).	Yes
Mon_065_004_020623	S44	Email	Ancient Woodland Natural England and the Forestry Commission, the Government's respective bodies for the natural environment and protecting, expanding and promoting the sustainable management of woodlands, define ancient woodland as follows within their standing advice: "Ancient woodland takes hundreds of years to establish and is defined as an irreplaceable habitat. It is a valuable natural asset important for: wildlife (which include rare and threatened species); soils; carbon capture and storage; contributing to the seed bank and genetic diversity; recreation, health and wellbeing; cultural, historical and landscape value. It has been wooded continuously since at least 1600AD. It includes: Ancient semi-natural woodland [ASNW] mainly made up of trees and shrubs native to the site, usually arising from natural regeneration. Plantations on ancient woodland sites –[PAWS] replanted with conifer or broadleaved trees that retain ancient woodland features, such as undisturbed soil, ground flora and fungi"		No
Mon_065_008_020623	S44	Email	Natural Resources Wales's Ancient Woodland Inventory2also places woodland into one of four categories:1hiips://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions2hiips://naturalresources.wales/guidance-and-advice/environmental-topics/woodland-management/woodlands-and-the-environment/ancient-woodland-inventory/?lang=en	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No
Mon_065_009_020623	S44	Email	Ancient Semi-Natural Woodland (ASNW) –broadleaf woodlands comprising mainly native tree and shrub species which are believed to have been in existence for over 400 years	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No





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Mon_065_010_020623	S44	Email	Plantation on Ancient Woodland Sites (PAWS) –sites which are believed to have been continuously wooded for over 400 years and currently have a canopy cover of more than 50percentnon-native conifer tree species	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No
Mon_065_011_020623	S44	Email	Restored Ancient Woodland Sites (RAWS) –woodlands which are predominately broadleaf now and are believed to have been continually wooded for over 400 years. These woodlands will have gone through a phase when canopy cover was more than 50% non-native conifer tree species and now have a canopy cover of more than 50 percent broadleaf.	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No
Mon_065_012_020623	S44	Email	Ancient Woodland Site of Unknown Category (AWSU) –woodlands which may be ASNW, RAWS or PAWS. These areas are predominantly in transition and existing tree cover is described as 'shrubs', 'young trees', 'felled' or 'ground prepared for planting'.	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No
Mon_065_013_020623	S44	Email	All ancient woodlands come within the definition of priority woodland habitats listed in Section 7 of the Environment Act (Wales). The Environment Act places a duty on public authorities to seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales and take all reasonable steps to maintain and enhance those species and habitats as listed in Section 7.	The Applicant notes your response. In accordance with the Environment Act, opportunities have been taken to both mitigate and enhance the existing landscape: this includes areas of habitat creation. Further details are available in the Outline Landscape and Ecology Management Plan (Document Reference J22).	No
Mon_065_014_020623	S44	Email	Ancient Trees Natural England's standing advice on ancient trees states that they "can be individual trees or groups of trees within wood pastures, historic parkland, hedgerows, orchards, parks or other areas. They are often found outside ancient woodlands. They are also irreplaceable habitats. An ancient tree is exceptionally valuable. Attributes can include its: great age, size, condition, biodiversity value as a result of significant wood decay and the habitat created from the ageing process; cultural and heritage value."	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No
Mon_065_015_020623	S44	Email	Veteran Trees Natural England's standing advice on veteran trees states that they "can be individual trees or groups of trees within wood pastures, historic parkland, hedgerows, orchards, parks or other areas. They are often found outside ancient woodlands. They are also irreplaceable habitats. A veteran tree may not be very old, but it has significant decay features, such as branch death and hollowing. These features contribute to its exceptional biodiversity, cultural and heritage value. "We consider that not all veteran trees are ancient, but all ancient trees are also veteran trees.	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No
Mon_065_016_020623	S44	Email	English Planning Policy Paragraph 5.3.14of the Overarching National Policy Statement for Energy (EN-1) states: "Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The IPC should not grant development consent for any development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location outweigh the loss of the woodland habitat. Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons why."	The Applicant notes your response, (now para 5.4.14 to 15 of 2024 NPS) - A tree survey and AIA has been undertaken for the Mona Onshore Development Area and is presented in Volume 7, Annex 6.6 of the Environmental Statement. Ancient Woodland, veteran trees and their root protection areas (RPA) have been avoided by the direct impacts of the Onshore Cable Corridor and Onshore Substation. Tree RPAs will be clearly marked and fenced off during construction. Tree protection measures are also detailed in Volume 7, Annex 6.6 and the outline CoCP (Document Reference J26).	No
Mon_065_017_020623	S44	Email	The National Planning Policy Framework, paragraph 180, states: "When determining planning applications, local planning authorities should apply the following principles:	The Applicant notes your response - NPPF is English policy and does not apply in Wales	No
Mon_065_018_020623	S44	Email	c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons63and a suitable compensation strategy exists;"	The Applicant notes your response - NPPF is English policy and does not apply in Wales	No
Mon_065_019_020623	S44	Email	Welsh Planning Policy Welsh Government recognises that areas of ancient woodland are declining and becoming increasingly fragmented and emphasises the importance of conserving ancient woodland and its value as a biodiversity resource through the publication of Planning Policy Wales version 11 (2021) (PPW 11). In PPW 11, paragraph 6.4.26 states "Ancient woodland and semi-natural woodlands and individual ancient, veteran and heritage trees are irreplaceable natural resources, and	The Applicant notes your response, (now para 5.4.14 to 15 of 2024 NPS) - A tree survey and AIA has been undertaken for the Mona Onshore Development Area and is presented in Volume 7, Annex 6.6 of the Environmental Statement. Ancient Woodland, veteran trees and their root protection areas	No





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			have significant landscape, biodiversity and cultural value. Such trees and woodlands should be afforded protection from development which would result in their loss or deterioration unless there are significant and clearly defined public benefits; this protection should prevent potentially damaging operations and their unnecessary loss. In the case of a site recorded on the Ancient Woodland Inventory, authorities should consider the advice of NRW. Planning authorities should also have regard to the Ancient Tree Inventory."	(RPA) have been avoided by the direct impacts of the Onshore Cable Corridor and Onshore Substation. Tree RPAs will be clearly marked and fenced off during construction. Tree protection measures are also detailed in Volume 7, Annex 6.6 and the outline CoCP (Document Reference J26).	
Mon_065_020_020623	S44	Email	Impacts to Ancient Woodland The proposed onshore cable has the potential to result in significant adverse impacts on ancient woodland through disturbance during construction of the pipeline, and potentially through indirect impacts where construction works occur within close proximity to these habitats. Five areas of ancient woodland are within the proposed corridor boundary, and numerous others are located within the wider work area, or adjacent to the corridor/work area boundaries. We are specifically concerned about the following impacts to the ancient woodlands within the route:	The Mona Onshore Development Area has been refined following the statutory consultation and the majority of woodland blocks have now been avoided. Where this has not been possible (for example at Llandduals Limestone and Gwrych Castle Wood) the project has committed to using trenchless techniques to avoid impacts (as set out in Volume 5, Annex 4.3: Onshore Crossing Schedule of the Environmental Statement).	Yes
Mon_065_021_020623	S44	Email	Impact to ancient woodland from the installation of the proposed cabling. We understand that trenchless crossings are proposed for within the corridor route.	The Mona Onshore Development Area has been refined following the statutory consultation and the majority of woodland blocks have now been avoided. Where this has not been possible (for example at Llandduals Limestone and Gwrych Castle Wood) the project has committed to using trenchless techniques to avoid impacts (as set out in Volume 5, Annex 4.3: Onshore Crossing Schedule of the Environmental Statement).	Yes
Mon_065_022_020623	S44	Email	Permanent fragmentation due to the removal of adjacent semi-natural habitats, such as small, wooded areas, hedgerows, individual trees and wetland habitats if continued access to the cable once constructed is required.	There will be limited permanent habitat fragmentation along the onshore cable corridor as following the construction of the onshore cable corridor habitat will be replaced, where possible. Access for operations and maintenance will utilise existing access to field. At the onshore substation, permanent habitat fragmentation will	Yes
				be mitigated for through woodland planting and hedgerow enhancement, further details are available in the Outline Landscape and Ecology Management Plan (Document Reference J22).	
Mon_065_024_020623	S44	Email	Root damage to woodland boundary trees during installation of the cable.	Ancient Woodland and veteran trees have been avoided by the Mona Onshore Development Area. Retained trees, RPAs and buffer zones will be avoided as much as possible. Tree RPAs will be clearly marked and fenced off during construction. The operation and maintenance of the Mona onshore substation and cable corridor should not necessitate the removal or encroachment on any tree RPAs, that have been retained. In the unlikely event that work near a retained tree is required a method statement for that work would be agreed with the relevant tree officer Tree RPAs will be clearly marked and fenced off during construction. Further detail is available in the Outline CoCP (Document Reference J26).	Yes
Mon_065_025_020623	S44	Email	The potential for trampling of sensitive ancient woodland flora and soils if access is required within any ancient woodland.	The Mona Offshore Wind Project has sought to avoid areas of ancient woodland through site selection (Volume 1, Chapter 4: Site selection and the consideration of alternatives) and the use of trenchless techniques for crossings (Volume 5, Annex 4.3: Onshore Crossing Schedule of the Environmental Statement). Buffers for construction activity will be provided around sensitive habitats such as ancient woodland (Outline CoCP (Document Reference J26)). Access will not be required to areas of ancient	Yes





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				woodland during the operations and maintenance phase of the project.	
Mon_065_026_020623	S44	Email	Natural England and Forestry Commission have identified impacts of development on ancient woodland within their standing advice (please see annex 2at the foot of this document for the full range of impacts outlined). This guidance should be considered Government's position with regards to development impacting ancient woodland, although Natural England and Forestry Commission should still be consulted for specific comment on this application.	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No
Mon_065_027_020623	S44	Email	In addition, Natural Resources Wales has published standing advice which outlines the potential impacts of development on ancient woodland and provides recommendations for their protection.	The Applicant notes your response and guidance on protecting ancient woodland has been followed during the development of the Mona Offshore Wind Project.	No
Mon_065_028_020623	S44	Email	We would also recommend that any non-ancient woodlands affected by the scheme are reviewed to ensure any areas of potentially unmapped ancient woodland are accounted for as the scheme progresses. Surveys detailing their woodland flora and fauna alongside an assessment of historical mapping should be undertaken, to ensure impacts to all irreplaceable habitats are considered and mitigated for as part of the design process.	A tree survey and Arboriculture Impact Assessment (AIA) have been undertaken for the Mona Onshore Development Area, to the relevant guidelines and British Standards. They are presented in Volume 7, Annex 6.6: Tree survey and Arboriculture Impact Assessment of the Environmental Statement	No
Mon_065_029_020623	S44	Email	Mitigation for ancient woodland Detrimental edge effects have been shown to penetrate woodland causing changes in ancient woodland characteristics that extend up to three times the canopy height in from the forest edges. As such, it is necessary for mitigation to be considered to alleviate such impacts. Additional mitigation approaches are outlined in our Planners' Manual 4; these measures would help ensure that the development meets policy requirement and guidance and include:	Ancient Woodland and veteran trees have been avoided by the Mona Onshore Development Area. Retained trees, RPAs and buffer zones will be avoided as much as possible. Tree RPAs will be clearly marked and fenced off during construction. The operation and maintenance of the Mona onshore substation and cable corridor should not necessitate the removal or encroachment on any tree RPAs, that have been retained.	Yes
Mon_065_030_020623	S44	Email	Non-invasive root investigation for ancient trees and protection beyond the limit of the usual investigative tools.	Ancient Woodland and veteran trees have been avoided by the Mona Onshore Development Area. Retained trees, RPAs and buffer zones will be avoided as much as possible. Tree RPAs will be clearly marked and fenced off during construction. The operation and maintenance of the Mona onshore substation and cable corridor should not necessitate the removal or encroachment on any tree RPAs, that have been retained.	Yes
Mon_065_031_020623	S44	Email	Retaining and enhancing natural habitats around ancient woodland to improve connectivity with the surrounding landscape.	The Illustrative Landscape and Ecology Strategy Plan has been designed to retain and enhance habitats where possible and improve ecological connectivity to the wider landscape. The proposed mitigation is shown on the Illustrative Landscape and Ecology Strategy Plan within the Outline Landscape and Ecological Management Plan (Document Reference J22), and details of mitigation measures are included in the Outline CoCP (Document Reference J26).	Yes
Mon_065_032_020623	S44	Email	Measures to control noise, dust and other forms of water and airborne pollution.	Measures to minimise the impacts from noise, dust and water- borne pollution during construction are set out in the Outline Code of Construction Practice (Document Reference J26) and its appendices.	Yes
Mon_065_033_020623	S44	Email	Implementation of an appropriate monitoring plan to ensure that proposed measures are effective over the long term and accompanied by contingencies should any conservation objectives not be met.	The Outline Landscape and Ecological Management Plan (Document Reference J22) includes a monitoring plan for the proposed landscaping planting.	Yes
Mon_065_034_020623	S44	Email	Buffer zones Buffering ancient woodland can be an ideal mitigation measure as buffer zones can be used to establish distance between the development and habitat, which helps to alleviate harmful impacts, while also creating new areas of habitat around the ancient woodland. This development should allow for a buffer zone of at least 30metres to prevent adverse impacts such as pollution and disturbance and ensure avoidance of root damage. HERAS fencing fitted with acoustic and dust	Ancient Woodland and veteran trees have been avoided by the Mona Onshore Development Area. Retained trees, RPAs and buffer zones will be avoided as much as possible. Tree RPAs will be clearly marked and fenced off during construction. The operation and maintenance of the Mona onshore substation and	Yes





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			screening measures should be put in place during construction to ensure that the buffer zone does not suffer from encroachment of construction vehicles/stockpiles, and to limit the effects of other indirect impacts.	cable corridor should not necessitate the removal or encroachment on any tree RPAs, that have been retained.	
Mon_065_035_020623	S44	Email	This is backed up by Natural England and Forestry Commission's standing advice which states that "the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic." Further information on buffer zones is outlined in the annex below.	A tree survey and AIA have been undertaken for the Mona Onshore Development Area, to the relevant guidelines and British Standards. They are presented in Volume 7, Annex 6.6 of the Environmental Statement. Ancient Woodland and veteran trees have been avoided by reducing the size of the Onshore Substation and the extent of the cable corridor and by choice of construction methodology. Tree RPAs will be avoided as much as possible by the Mona Onshore Development Area. Tree RPAs will be clearly marked and fenced off during construction. Dust impacts during construction will be managed through measures in the Dust Management Plan. The operation and maintenance of the Onshore Substation is unlikely to generate air pollution impacts.	No
Mon_065_036_020623	S44	Email	Natural Resources Wales's standing advice also outlines the following guidance on protection zones: "A stand-off or protection zone's purpose is to protect ancient woodland. The size and type of stand-off or protection zone should vary depending on the scale, type and impact of the development. The BS 5837 Tree Survey, PEA and/or EcIA assessments should be used to inform the stand-off or protection zone for each individual woodland and veteran and ancient trees. Some zones may only require a root protection area to prevent negative impacts on individual trees or groups of trees, and others are likely to extend further." Natural Resources Wales /Advice to planning authorities considering proposals affecting ancient woodland4hiips://www.woodlandtrust.org.uk/media/3731/planners-manual-for-ancient-woodland.pdf	A tree survey and AIA have been undertaken for the Mona Onshore Development Area, to the relevant guidelines and British Standards. They are presented in Volume 7, Annex 6.6 of the Environmental Statement. Ancient Woodland and veteran trees have been avoided by reducing the size of the Onshore Substation and the extent of the cable corridor and by choice of construction methodology. Tree Root Protection Areas (RPA) will be avoided as much as possible by the Mona Onshore Development Area. Tree RPAs will be clearly marked and fenced off during construction. The operation and maintenance of the Onshore Substation and Onshore Cable Corridor should not necessitate the removal of trees or encroachment on any tree RPAs. These tree protection measures are also detailed in the outline CoCP (Document Reference J26).	No
Mon_065_037_020623	S44	Email	Trenchless crossings The Trust understands that the areas of ancient woodland within the corridor boundary are likely to be subject to a trenchless crossing in order to limit the removal of irreplaceable ancient woodland soils during construction. The Trust would primarily advocate for the redirection of any cabling through ancient woodland areas, however if such works are likely to occur should development consent be granted, then we would appreciate further clarification on the technique and any potential impacts posed.	Volume 5, Chapter 4.3: Onshore crossing schedule of the Environmental Statement outlines the proposed crossing methodologies for each obstacle along the onshore cable corridor, including areas of Ancient Woodland.	Yes
Mon_065_038_020623	S44	Email	Veteran trees We have identified a number of ancient and veteran trees within the proposed cabling corridor that are recorded on the Ancient Tree Inventory 5. The specific trees in question are outlined within the appended table at the bottom of the document. It is important that an arboricultural impact assessment is undertaken early within the design process, to ensure that ancient and veteran trees are identified and accounted for as the route is refined. This will ensure that appropriate protection can be incorporated into the scheme design.	A tree survey and Arboriculture Impact Assessment (AIA) have been undertaken for the Mona Onshore Development Area, to the relevant guidelines and British Standards. They are presented in Volume 7, Annex 6.6: Tree survey and Arboriculture Impact Assessment of the Environmental Statement	No
Mon_065_039_020623	S44	Email	It is essential that no ancient or veteran trees are lost as part of the development. The loss of any such trees can have a significant impact on local wildlife, particularly those which depend on the habitat provided by veteran trees. Any loss of veteran trees can also be highly deleterious where there is a wider population of veteran trees within close proximity, which may harbour rare and important species.	A tree survey and AIA have been undertaken for the Mona Onshore Development Area, to the relevant guidelines and British Standards. They are presented in Volume 7, Annex 6.6 of the Environmental Statement. Ancient Woodland and veteran trees have been avoided by reducing the size of the Onshore Substation and the extent of the cable corridor and by choice of construction methodology. Tree Root Protection Areas (RPA) have been avoided as much	No





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				as possible by the Mona Onshore Development Area. Tree RPAs will be clearly marked and fenced off during construction. The operation and maintenance of the Onshore Substation and Onshore Cable Corridor should not necessitate the removal of trees or encroachment on any tree RPAs. These tree protection measures are also detailed in the outline CoCP (Document Reference J26).	
Mon_065_040_020623	S44	Email	Trees are susceptible to change caused by construction/development activity. As outlined in 'BS5837:2012 -Trees in relation to design, demolition and construction' (the British Standard for ensuring development works in harmony with trees), construction work often exerts pressures on existing trees, as do changes in their immediate environment following construction of any new infrastructure. Root systems, stems and canopies, all need allowance for future movement and growth, and should be taken into account in all proposed works on the scheme through the incorporation of the measures outlined in the British Standard.	A tree survey and AIA have been undertaken for the Mona Onshore Development Area, to the relevant guidelines and British Standards. They are presented in Volume 7, Annex 6.6 of the Environmental Statement. Ancient Woodland and veteran trees have been avoided by reducing the size of the Onshore Substation and the extent of the cable corridor and by choice of construction methodology. Tree Root Protection Areas (RPA) have been avoided as much as possible by the Mona Onshore Development Area. Tree RPAs will be clearly marked and fenced off during construction. The operation and maintenance of the Onshore Substation and Onshore Cable Corridor should not necessitate the removal of trees or encroachment on any tree RPAs. These tree protection measures are also detailed in the outline CoCP (Document Reference J26).	No
Mon_065_041_020623	S44	Email	While BS5837 guidelines state that trees should have a root protection area (RPA) of 12 times the stem diameter (capped at 15m), this guidance does recognise that veteran trees need particular care to ensure adequate space is allowed for their long-term retention. It is imperative that Natural England and Forestry Commission's standing advice on root protection areas for veteran trees is taken into account in planning decisions.	A tree survey and AIA have been undertaken for the Mona Onshore Development Area, to the relevant guidelines and British Standards. They are presented in Volume 7, Annex 6.6 of the Environmental Statement. Ancient Woodland and veteran trees have been avoided by reducing the size of the Onshore Substation and the extent of the cable corridor and by choice of construction methodology. Tree Root Protection Areas (RPA) have been avoided as much as possible by the Mona Onshore Development Area. Veteran tree and Ancient Woodland buffer zones have also been respected by the infrastructure works. Tree RPAs will be clearly marked and fenced off during construction. Tree protection measures are also detailed in the outline CoCP (Document Reference J26).	Yes
Mon_065_042_020623	S44	Email	This advice states: "For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area. Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone."	A tree survey and AIA have been undertaken for the Mona Onshore Development Area, to the relevant guidelines and British Standards. They are presented in Volume 7, Annex 6.6 of the Environmental Statement. Ancient Woodland and veteran trees have been avoided by reducing the size of the Onshore Substation and the extent of the cable corridor and by choice of construction methodology. Tree Root Protection Areas (RPA) have been avoided as much as possible by the Mona Onshore Development Area. Tree RPAs will be clearly marked and fenced off during construction. These tree protection measures are also detailed in the outline CoCP (Document Reference J26).	Yes
Mon_065_043_020623	S44	Email	Conclusion Ancient woodland and veteran trees are irreplaceable habitats, once lost they are gone forever. Any development resulting in loss or deterioration of ancient woods and trees must consider all possible measures to ensure avoidance of adverse impact. We would appreciate the opportunity to	The Woodland Trust attended an Onshore Ecology Expert Working Group to discuss the Illustrative Landscape and Ecology Plan for the Onshore Substation. The Applicant will	No





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			discuss the proposals in more detail ahead of the next phase of design; if you would like to get in touch, our contact email is REDACTED.	continue to engage with The Woodland Trust through the Evidence Plan Process.	
Mon_066_058_020623	S42	Email	Seascape Landscape and Visual Resources - MARKED ORANGE BASED OFF THEIR APPENDIX Due to the larger size of the Wind Turbine Generators (WTGs) for Round 4 projects compared to earlier OWFs (in this case WTGs up to 324m to blade tip) we advise that the project should be using a 60km study area to ensure that impacts to designated landscapes can be fully considered. As this PEIR has only presented a 50km study area, a SLVIA that uses a 60 km study area may identify impacts to English sites.	The 60km buffer does overlap the edge of the Lake District National Park. We have undertaken further studies of the effects of the Mona Offshore Wind Energy Project on the Special Qualities of internationally and nationally designated landscapes. However, as the LDNP is at the extremity of the Mona 60km buffer, it has been mentioned but not assessed in full.	Yes
Mon_069_280_010623	S42	Email	Chapter 26 Seascape. Landscape and Visual Resources (SLIVA) The exact layout of each Project's infrastructure is still being developed and will not be finalised until the Project has been granted consent by the Planning Inspectorate and Secretary of State for the Department for Energy Security and Net Zero. Due to the complexity of the Project, many details will likely remain unknown to us at the time of submitting our application, including the:	Noted. Response received.	No
Mon_069_284_010623	S42	Email	The work has been undertaken in accordance with accepted industry guidance (SLIVA). Whilst there are some points of detail that may merit further scrutiny/debate, which is often the case when judgement is involved, generally the findings are concurred with. They are all based on worst case scenarios. The preliminary SLIVA's establish that there will be no significant effects on seascape, landscape or visual receptors. Due to long distance, the large scale of the associated seascape and the presence of existing operational offshore windfarms. While they will be visible on the eastern horizon it is in the context of an expansive seascape with the presence of existing operational offshore windfarms.	The Applicant notes your response.	No
Mon_069_320_010623	S42	Email	Visual impact of proposals on the setting of protected monuments on the east side of the watershed of the Island. As with the Morgan development, this could involve approximately25 monuments. Whilst the impact could be considered limited, but there are some flagship sites such as Castle Rushen and Laxey Wheel which are major tourist assets of national and economic significance to the Island where the impact should be considered more holistically.	A setting assessment has been undertaken and is presented in Volume 7, Annex 5.7 Setting Assessment (offshore infrastructure).	No
Mon_070_039_010623	S42	Email	However, the SLVIA notes that moderate adverse effects are identified for users of the Wales Coastal Path from several viewpoints selected across North Anglesey (see section 5 of the Councils response for further detail). In addition, it is considered there is a lack of any proposed mitigation or enhancement to address moderate and potentially significant adverse effects on views from the Wales Coast Path in the Anglesey AONB arising from the project and in conjunction with cumulative projects.	The Applicant notes your response	Yes
Mon_070_040_010623	S42	Email	This raises significant concerns regarding the potential indirect negative impacts that the landscape and visual impacts of the proposal may have on Anglesey and the wider region as a key tourist destination as well as associated socio-economic impacts.	Volume 3, Chapter 6: Landscape and visual receptors of the Environmental Statement considers the effects of the proposed infrastructure within the Mona Onshore Development Area. The Isle of Anglesey does not fall within the study area agreed with NRW as suitable for the Mona Onshore Development Area	Yes
Mon_070_041_010623	S42	Email	The Council requests that the likely impact confirmed in the SLVIA are given further consideration within a socio-economic impact context including consideration for potential further mitigation and / or enhancement measures that can be designed into the project to minimise potential impacts.	See the response above	No
Mon_070_042_010623	S42	Email	5. Seascape, Landscape and Visual Impact Assessment Chapter 26 of the PEIR presents the assessment of the potential impact of the Mona Wind Project on seascape, landscape and visual resources and is informed by a Seascape Landscape and Visual Impact Assessment (SLVIA). The SLVIA study area for the Mona Offshore Wind Project is a 50km area from the Mona Array Area, 20km for the offshore reactive compensation substations (within the 50km Mona Array Area study area), a 1km buffer from the Mona Proposed Onshore Development Area and 10km from the Onshore Substation.	The Applicant notes your response.	No
Mon_070_043_010623	S42	Email	SLVIA Policy Considerations: A broad overview is given to the commitment, legislation and policy base that is applicable to renewable energy development at a national level. However, no reference is	The special qualities of the Isle of Anglesey AONB are considered in a separate assessment or study contained within	No



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			made to the consideration of policy set out within the Joint Anglesey and Gwynedd Local Development Plan (JLDP). The Council requests that the JLDP is recognised as a relevant Policy with the relevant policy identified and commented upon. This will ensure that the Council can be assured that due consideration has been made to policy especially in providing commentary on the assessment of effect significance and developing an appropriate and proportionate response to mitigation which fully reflects Anglesey interests.	Annex 8.5 of the Seascape and visual resources Environmental Statement chapter.	
Mon_070_044_010623	S42	Email	Impact Assessment Methodology and Selected Viewpoints: Overall the methodology for the SLVIA appears to be in line with best practice. The only area of concern is how the assessment of significance, and its reporting, differs from the main ES methodology used by other disciplines.	All three NRW (2019) guidance documents were reviewed. Including one that sets out heights and distances of turbines relating to different magnitude, sensitivity and significance of effects. SLVIA is not a scientific discipline and so magnitude, sensitivity and effects do not readily fall into different categories as the context changes. Also, on reviewing the NRW methodology, which drew on DTI (2005) guidance, transcription errors were noted. Therefore, the methodology used in the Environmental Statement chapter reverted to that source guidance as well as GLVIA3 (recognised in the NRW 2019 guidance, as the most appropriate assessment guidance to use). This is explained more fully in the offshore methodology annex to the seascape and visual resources Environmental Statement chapter. The DTI guidance considers that most 'moderate' significance of effects will not be significant.	No
Mon_070_047_010623	S42	Email	Significance levels: The SLVIA method introduces a category of 'Substantial' effects beyond and in addition to the Major category used throughout the ES. In Table 26.13 the descriptors for Substantial effects seem very similar to the Major category in Table 5.9 of the ES methodology. It is not clear why this additional category is needed specifically for the assessment of seascape/ landscape and visual effects. The Council requests that clarity is provided as to why the method in the SLVIA varies from that used across the ES, and specifically why an additional 'Substantial' category is required. Guidance on this aspect is provided at Para 3.33 and 3.35 in GLVIA5, which states that assessment should be 'consistent across the different topic areas in the EIA.'	All three NRW (2019) guidance documents were reviewed. Including one that sets out heights and distances of turbines relating to different magnitude, sensitivity and significance of effects. SLVIA is not a scientific discipline and so magnitude, sensitivity and effects do not readily fall into different categories as the context changes. Also, on reviewing the NRW methodology, which drew on DTI (2005) guidance, transcription errors were noted. Therefore, the methodology used in the Environmental Statement chapter reverted to that source guidance as well as GLVIA3 (recognised in the NRW 2019 guidance, as the most appropriate assessment guidance to use). This is explained more fully in Volume 6, Annex 8.4: Seascape, landscape and visual impact assessment methodology of the Environmental Statement. The DTI guidance considers that most 'moderate' significance of effects will not be significant. The methodology used in the SLVIA is in Volume 6, Annex 8.4: Seascape, landscape and visual impact assessment methodology of the Environmental Statement. The assessment methodology used in the LVIA is in Volume 7, Annex 6.4: Landscape and visual impact assessment methodology of the Environmental Statement.	
Mon_070_048_010623	S42	Email	Significance threshold: The ES methodology (para. 5.3.6.16) states that any effect of Moderate or greater is considered 'significant'. This is considered to align with common practice. However, the SLVIA Method states that effects with a significance level of Substantial or Major have been deemed significant. There is a concern that this approach could lead to the underplaying of the significance of moderate effects normally considered to be significant in EIA.	All three NRW (2019) guidance documents were reviewed. Including one that sets out heights and distances of turbines relating to different magnitude, sensitivity and significance of effects. SLVIA is not a scientific discipline and so magnitude, sensitivity and effects do not readily fall into different categories as the context changes. Also, on reviewing the NRW methodology, which drew on DTI (2005) guidance, transcription errors were noted. Therefore, the methodology used in the Environmental Statement chapter reverted to that source guidance as well as GLVIA3 (recognised in the NRW 2019 guidance, as the most appropriate assessment guidance to use). This is explained more fully in Volume 6, Annex 8.4:	No



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				Seascape, landscape and visual impact assessment methodology of the Environmental Statement. The DTI guidance considers that most 'moderate' significance of effects will not be significant. The methodology used in the SLVIA is in Volume 6, Annex 8.4: Seascape, landscape and visual impact assessment methodology, of the Environmental Statement. The assessment methodology used in the LVIA is in Volume 7, Annex 6.4: Landscape and visual impact assessment methodology of the Environmental Statement.	
				In general, a significance of effect of moderate or greater is considered 'significant' in EIA terms, however for each topic chapter, what is considered 'significant' has been clearly defined (see Volume 1, Chapter 5: Environmental Impact Assessment methodology of the Environmental Statement). Note: GLVIA3 explains at paragraph 3.32 "Some practitioners use the phrase 'not significant in EIA terms' to describe those effects considered to fall below a 'threshold' of significance but this can potentially confuse since the phrase has no specific meaning in relation to the EIA Regulations."	
Mon_070_049_010623	S42	Email		SLVIA is not a scientific discipline and so magnitude, sensitivity and effects do not readily fall into different categories as the context changes, significance is more a continuum, so a range of X to Y is more accurate (i.e. they are very rarely either or). Note: GLVIA3 explains at paragraph 3.32 "Some practitioners use the phrase 'not significant in EIA terms' to describe those effects considered to fall below a 'threshold' of significance but this can potentially confuse since the phrase has no specific meaning in relation to the EIA Regulations." Also, on reviewing the NRW methodology, which drew on DTI (2005) guidance, transcription errors were noted. Therefore, the methodology used in the Environmental Statement chapter reverted to that source guidance as well as GLVIA3 (recognised in the NRW 2019 guidance, as the most appropriate assessment guidance to use). This is explained more fully in the offshore methodology annex to the seascape and visual resources Environmental Statement chapter. The DTI guidance considers that most 'moderate' significance of effects will not be significant. The methodology used in the SLVIA is in Volume 6, Annex 8.4: Seascape, landscape and visual impact assessment methodology, of the Environmental Statement. The assessment methodology used in the LVIA is in Volume 7, Annex 6.4: Landscape and visual impact assessment methodology, of the Environmental Statement.	
Mon_070_053_010623	S42	Email	At Table 1.6 in the SLVIA Methodology these dual categories instead use the word 'to' in the matrix's dual categories. This implies that these effects always span the significance threshold. It is accepted that there may be instances where effects do genuinely span the threshold. However, through use of professional judgement, properly evidenced and explained in narrative text, these instances are likely to be the exception rather than the rule. Applying this method (using 'to rather than 'or') is considered likely to result in oversimplification in reporting many effects as a broad range rather than a more defined level of effect. Rectifying this would aid in the clarification of which effects are significant and which are not.	SLVIA is not a scientific discipline and so magnitude, sensitivity and effects do not readily fall into different categories as the context changes, significance is more a continuum, so a range of X to Y is more accurate (i.e. they are very rarely either or). Note: GLVIA3 explains at paragraph 3.32 "Some practitioners use the phrase 'not significant in EIA terms' to describe those effects considered to fall below a 'threshold' of significance but this can potentially confuse since the phrase has no specific meaning in relation to the EIA Regulations." Also, on reviewing the NRW methodology, which drew on DTI (2005) guidance, transcription errors were noted. Therefore, the methodology	No



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Mon_070_054_010623	S42	Email	One of the many examples of this throughout the assessment is at para 26.17.1.24, where effects on	used in the Environmental Statement chapter reverted to that source guidance as well as GLVIA3 (recognised in the NRW 2019 guidance, as the most appropriate assessment guidance to use). This is explained more fully in the offshore methodology annex to the seascape and visual resources Environmental Statement chapter. The DTI guidance considers that most 'moderate' significance of effects will not be significant. The methodology used in the SLVIA is in Volume 6, Annex 8.4: Seascape, landscape and visual impact assessment methodology, of the Environmental Statement. The assessment methodology used in the LVIA is in Volume 7, Annex 6.4: Landscape and visual impact assessment methodology, of the Environmental Statement. All three NRW (2019) guidance documents were reviewed (NRW Report pop. 215, 220 and 231), Including one that sets.	No
			LANDMAP Aspect Areas is reported as Moderate to Major and not significant and is considered to overly simplify the reporting of a range effects on many receptors. For clarity, where effects fall into one of the matrices' dual categories the assessment should confirm which level applies in each case and provide narrative explanation to justify each decision.	(NRW Report nos. 315, 330 and 331). Including one that sets out heights and distances of turbines relating to different magnitude, sensitivity and significance of effects. SLVIA is not a scientific discipline and so magnitude, sensitivity and effects do not readily fall into different categories as the context changes, significance is more a continuum, so a range of X to Y is more accurate (i.e. they are very rarely either or). Note: GLVIA3 explains at paragraph 3.32 "Some practitioners use the phrase 'not significant in EIA terms' to describe those effects considered to fall below a 'threshold' of significance but this can potentially confuse since the phrase has no specific meaning in relation to the EIA Regulations." Also, on reviewing the NRW methodology, which drew on DTI (2005) guidance, transcription errors were noted. Therefore, the methodology used in the Environmental Statement chapter reverted to that source guidance as well as GLVIA3 (recognised in the NRW 2019 guidance, as the most appropriate assessment guidance to use). This is explained more fully in the offshore methodology annex to the seascape and visual resources Environmental Statement chapter. The DTI guidance considers that most 'moderate' significance of effects will not be significant. The methodology used in the SLVIA is in Volume 6, Annex 8.4: Seascape, landscape and visual impact assessment methodology, of the Environmental Statement. The assessment methodology used in the LVIA is in Volume 7, Annex 6.4: Landscape and visual impact assessment methodology, of the Environmental Statement.	
Mon_070_055_010623	S42	Email	If there is a receptor or group of receptors that does receive a range of effects, that might vary geographically or with the seasons for example, then this also needs to be explained and apportioned. This would help the reader understand which receptors (along the length of a route or within a group, such as LANDMAP Aspect Areas, or residents in a community, for example) are predicted to receive which level of effect and how the effects vary.	All three NRW (2019) guidance documents were reviewed (NRW Reports 315, 330 and 331). Including one that sets out heights and distances of turbines relating to different magnitude, sensitivity and significance of effects. SLVIA is not a scientific discipline and so magnitude, sensitivity and effects do not readily fall into different categories as the context changes. Also, on reviewing the NRW methodology, which drew on DTI (2005) guidance, transcription errors were noted. Therefore, the methodology used in the Environmental Statement chapter reverted to that source guidance as well as GLVIA3 (recognised in the NRW 2019 guidance, as the most appropriate assessment guidance to use). This is explained more fully in the offshore methodology annex to the seascape and visual resources Environmental Statement chapter. The DTI guidance considers that most 'moderate' significance of effects will not be	No





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				significant. The methodology used in the SLVIA is in Volume 6, Annex 8.4: Seascape, landscape and visual impact assessment methodology, of the Environmental Statement. The assessment methodology used in the LVIA is in Volume 7, Annex 6.4: Landscape and visual impact assessment methodology, of the Environmental Statement.	
Mon_070_056_010623	S42	Email	Night-time effects: The SLVIA methodology states that: 1.9.2.3A significant night-time effect is likely where implementation of the Mona Offshore Wind Project would have a defining influence on a landscape, seascape or visual receptor at night. In contrast, a not significant night-time effect is likely to occur when the effect of lighting is non-defining, and the existing baseline characteristics of the night-time view, area of seascape or landscape continue to provide the defining influence.	Noted.	No
Mon_070_057_010623	S42	Email	In the paragraph above, it is not clear what constitutes a defining or non-defining influence. The Council requests that more detail is sought as to how night-time effects will be assessed and presented. It is not clear whether night-time effects will be presented separately for each receptor or as a summary under receptors groups.	A night time assessment has been undertaken of the Mona Array Area as part of the Environmental Statement, this is presented in Volume 2, Chapter 8: Seascape and visual resources of the Environmental Statement. Night time visualisations from popular and populus locations are provided at Volume 6, Annex 8.6: Seascape visualisations, of the Environmental Statement. The Mona onshore substation will not be lit at night. Lights would only be used if emergency maintenance was required in hours of darkness.	No
Mon_070_058_010623	S42	Email	Section 1.9.2 does state that night-time effects will be assessed using the same criteria and significance descriptors as for day-time effects. It is considered that the baseline, receptor sensitivity, and magnitude of change are all likely to differ considerably between day and night at night.	A night time assessment has been undertaken of the Mona Array Area as part of the Environmental Statement, this is presented in Volume 2, Chapter 8: Seascape and visual resources of the Environmental Statement. Night time visualisations from popular and populus locations are provided at Volume 6, Annex 8.6: Seascape visualisations, of the Environmental Statement. The Mona onshore substation will not be lit at night. Lights would only be used if emergency maintenance was required in hours of darkness.	No
Mon_070_059_010623	S42	Email	The Council requests confirmation that night-time effects will be assessed fully and presented with narrative explaining decisions on baseline, sensitivity, magnitude of change and significance of effects?	A night time assessment has been undertaken of the Mona Array Area as part of the Environmental Statement, this is presented in Volume 2, Chapter 8: Seascape and visual resources of the Environmental Statement. Night time visualisations from popular and populus locations are provided at Volume 6, Annex 8.6: Seascape visualisations, of the Environmental Statement. The Mona onshore substation will not be lit at night. Lights would only be used if emergency maintenance was required in hours of darkness.	No
Mon_070_060_010623	S42	Email	Selection of Viewpoints: Consultation has previously been undertaken with the Council in relation to the production of PEIR. In particular this relates to the requirements of the Council in respect of selected viewpoints in support of the SLVIA. VPs, 1, 2, 3, 4, 24, 25, 26, 27 and 28 are all within Anglesey, evenly spread along the north and east coast and are all within the Anglesey AONB.	The Applicant notes your response.	No
Mon_070_061_010623	S42	Email	Assessment of Effects and Impact prediction for Anglesey Receptors (including designated and protected landscapes): Notwithstanding the comments above around the assessment method and its application, it is considered that the assessments undertaken are generally proportionate and robust.	The Applicant notes your response.	No
Mon_070_062_010623	S42	Email	To date no assessment appears to have been made of the potential night-time effects on landscape or visual receptors. The Council requests confirmation that a full assessment of nigh-time effects on seascape, landscape and visual receptors will be undertaken as part of the ongoing EIA work and completed prior to finalisation and submission of the application.	A night time assessment has been undertaken of the Mona Array Area as part of the Environmental Statement, this is presented in Volume 2, Chapter 8: Seascape and visual resources of the Environmental Statement. Night time visualisations from popular and populus locations are provided at Volume 6, Annex 8.6: Seascape visualisations, of the	No





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				Environmental Statement. The Mona onshore substation will not be lit at night. Lights would only be used if emergency maintenance was required in hours of darkness.	
Mon_070_063_010623	S42	Email	Table 1 Summary of Offshore project Landscape and Visual effects on receptors relevant to Anglesey:	The Applicant notes your response.	No
Mon_070_064_010623	S42	Email	Receptor - Seascape Character Area SSZ 4 North Wales and North Anglesey Offshore and SSZ 5 North Wales and Anglesey Outer Offshore. Construction and decommissioning effects - minor adverse. Operations and maintenance effects - Operations and maintenance effects	The Applicant notes your response.	No
Mon_070_065_010623	S42	Email	Receptor – National Character Areas NLCA 1 Afordir Môn/Anglesey Coast. Construction and decommissioning effects - negligible to minor adverse. Operations and maintenance effects - minor adverse	The Applicant notes your response.	No
Mon_070_066_010623	S42	Email	Receptor - Designated Landscape Ynys Mon/Isle of Anglesey AONB. Construction and decommissioning effects - negligible to minor adverse. Operations and maintenance effects - negligible to minor adverse	The Applicant notes your response.	No
Mon_070_067_010623	S42	Email	Receptor - National Trails/long distance paths -Wales Coast Path North coast of Anglesey: Vps 2, 3, 25, 28. Construction and decommissioning effects - negligible to minor adverse. Operations and maintenance effects - minor to moderate adverse.	The Applicant notes your response.	No
Mon_070_068_010623	S42	Email	Receptor - Countryside Rights of Way Act 2000 Access Land, or equivalent land with public access North Anglesey Vps 1, 2, 3, 4, 26, 28. Construction and decommissioning effects - negligible to minor adverse. Operations and maintenance effects - minor to moderate adverse,	The Applicant notes your response.	No
Mon_070_069_010623	S42	Email	Receptor - NCR 566 Northwest Anglesey from Llanryddlad to Llaneilian/Point Lynas. Construction and decommissioning effects - Negligible to minor adverse, Operations and maintenance effects - minor adverse	The Applicant notes your response.	No
Mon_070_070_010623	S42	Email	Receptor - main coastal settlement seafronts/shorelines on Anglesey Vps 25, 27. Construction and decommissioning effects - negligible to minor adverse, Operations and maintenance effects - minor to moderate adverse,	The Applicant notes your response.	No
Mon_070_071_010623	S42	Email	Assessment of Cumulative Impact Methodology and Predicted Effects: The methodology used for the assessment of Cumulative effects appears to be broadly acceptable. The assessment of cumulative effects on seascape/landscape and visual receptors appears broadly acceptable.	The Applicant notes your response.	No
Mon_070_072_010623	S42	Email	Table 2 Summary of Offshore project Landscape and Visual cumulative effects on receptors relevant to Anglesey:	The Applicant notes your response.	No
Mon_070_073_010623	S42	Email	Receptor - Aesthetic aspect and overall character of Seascape Character Area SSZ 4 North Wales and North Anglesey Offshore and SSZ 5 North Wales and Anglesey Outer Offshore. Construction and decommissioning cumulative effects - Tier 1 -negligible to minor adverse Tier 2 -moderate adverse Operations and maintenance cumulative effects - Tier 1- minor adverse Tier 2 -moderate or major adverse	The Applicant notes your response.	No
Mon_070_074_010623	S42	Email	Receptor -National Character Areas NLCA 1 Afordir Môn/Anglesey Coast. Construction and decommissioning cumulative effects - Not assessed. Operations and maintenance cumulative effects - Not assessed	The effects of the project on NLCA 01 and NLCA 08 are considered in section 8.8.2 of Volume 2, chapter 6: Seascape and visual resources of the Environmental Statement, and also as part of the Isle of Anglesey National Landscape in Volume 6, Annex 8.5: International and nationally designated landscapes study of the Environmental Statement. The SLVIA methodology is set out in Volume 6, Annex 8.4: Seascape, landscape and visual impact assessment methodology, of the Environmental Statement.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_070_075_010623	S42	Email	Receptor - Designated Landscape Ynys Mon/Isle of Anglesey AONB. Construction and decommissioning cumulative effects. Operations and maintenance cumulative effects - Negligible adverse Negligible adverse	The Applicant notes your response.	No
Mon_070_076_010623	S42	Email	Receptor - Viewpoints representing the Wales Coast Path on Anglesey and Anglesey AONB Vps 2, 3, 27, 28Tier 1 -minor or moderate adverse, Tier 2 - minor adverse Tier 1 -moderate adverse, Tier 2 - minor or moderate adverse	The Applicant notes your response.	No
Mon_070_077_010623	S42	Email	Receptor - NCR 566 Northwest Anglesey from Llanryddlad to Llaneilian/Point Lynas. Construction and decommissioning cumulative effects - Not assessed. Operations and maintenance cumulative effects - Not assessed	The Applicant notes your response.	No
Mon_070_078_010623	S42	Email	Receptor - Main settlement seafronts/popular destinations – Benllech, Anglesey Vps 25, 27. Construction and decommissioning cumulative effects - minor to moderate adverse. Operations and maintenance cumulative effects - moderate adverse	The Applicant notes your response.	No
Mon_070_079_010623	S42	Email	In table 26.32, moderate cumulative effects are predicted on the character of SSZ 4, SSZ 5 and on views of PRoW users at Representative Cumulative VP 3 Mynydd Eilian and VP 28 Pennon Point (Anglesey AONB and Wales Coast Path) and to people at seafronts/popular destinations represented by Vps 25 and 27.	The Applicant notes your response.	No
Mon_070_080_010623	S42	Email	Subject to resolution of the point raised above relating to significant threshold, these effects could be deemed to be significant and justify consideration of reasonable additional mitigation. The Council can confirm once clarity has been received as to the significant threshold used for the SLVIA.	SLVIA is not a scientific discipline and so magnitude, sensitivity and effects do not readily fall into different categories as the context changes, significance is more a continuum, so a range of X to Y is more accurate (i.e. they are very rarely either / or). Note: GLVIA3 explains at paragraph 3.32 "Some practitioners use the phrase 'not significant in EIA terms' to describe those effects considered to fall below a 'threshold' of significance but this can potentially confuse since the phrase has no specific meaning in relation to the EIA Regulations." Also, on reviewing the NRW methodology, which drew on DTI (2005) guidance, transcription errors were noted. Therefore, the methodology used in the Environmental Statement chapter reverted to that source guidance as well as GLVIA3 (recognised in the NRW 2019 guidance, as the most appropriate assessment guidance to use). This is explained more fully in the offshore methodology annex to the seascape and visual resources Environmental Statement chapter. The DTI guidance considers that most 'moderate' significance of effects will not be significant. The methodology used in the SLVIA is in Volume 6, Annex 8.4: Seascape, landscape and visual impact assessment methodology, of the Environmental Statement. The assessment methodology used in the LVIA is in Volume 7, Annex 6.4: Landscape and visual impact assessment methodology, of the Environmental Statement.	
Mon_070_081_010623	S42	Email	Approach to Mitigation and Residual Effects Landscape mitigation / enhancement for project effects: The offshore elements of the project are the only ones considered to have the potential to give rise to effects felt by a seascape/landscape or visual receptors on or relevant to Anglesey. The only mitigation measure adopted as part of the project to attempt to reduce these effects is the 'colour of the turbines to be grey'. The assessment identifies no 'further mitigation measures' to mitigate any effects on receptors of effects from the offshore development.	The array area for the offshore wind turbines and OSPs has reduced in size since PEIR and the maximum number of turbines has reduced from 107 to 96, albeit the maximum height of turbines (up to 68 of them) may be 40m taller than that assessed at PEIR. The reduction in the footprint of the offshore components has been driven by a number of factors and as a consequence, is a mitigating factor in terms of the effects of the offshore wind turbines and OSPs on landscape, seascape and visual amenity.	Yes
Mon_070_082_010623	S42	Email	Landscape mitigation / enhancement for cumulative effects: The measures referred to in SLVIA Chapter 26, Section 26.25 and described in Table 26.26 are designed and adopted to mitigate effects	The array area for the offshore wind turbines and OSPs has reduced in size since PEIR and the maximum number of	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			from the Mona Offshore Wind Project. For clarity it is considered important to distinguish between these mitigation measures and any measures included in the design, to address the additional cumulative seascape/landscape and visual effects of the development in conjunction with other projects.	turbines has reduced from 107 to 96, albeit the maximum height of turbines (up to 68 of them) may be 40m taller than that assessed at PEIR. The reduction in the footprint of the offshore components has been driven by a number of factors and as a consequence, is a mitigating factor in terms of the effects of the offshore wind turbines and OSPs on landscape, seascape and visual amenity.	
Mon_070_083_010623	S42	Email	Lack of mitigation: Apart from the grey colour and finish proposed for the turbines, no landscape or visual mitigation is proposed to address the effects of the offshore development on the visual and seascape setting of the north east Anglesey Coast.	The array area for the offshore wind turbines and OSPs has reduced in size since PEIR and the maximum number of turbines has reduced from 107 to 96, albeit the maximum height of turbines (up to 68 of them) may be 40m taller than that assessed at PEIR. The reduction in the footprint of the offshore components has been driven by a number of factors and as a consequence, is a mitigating factor in terms of the effects of the offshore wind turbines and OSPs on landscape, seascape and visual amenity.	Yes
Mon_070_084_010623	S42	Email	It appears that no additional mitigation or enhancement measures are proposed in order to address any of the identified offshore project or cumulative visual effects on the Viewpoints representing the Wales Coast Path on Anglesey and Anglesey AONB (represented by VP 2, 3, 27 and 28).	The array area for the offshore wind turbines and OSPs has reduced in size since PEIR and the maximum number of turbines has reduced from 107 to 96, albeit the maximum height of turbines (up to 68 of them) may be 40m taller than that assessed at PEIR. The reduction in the footprint of the offshore components has been driven by a number of factors and as a consequence, is a mitigating factor in terms of the effects of the offshore wind turbines and OSPs on landscape, seascape and visual amenity.	Yes
Mon_070_085_010623	S42	Email	In light of this fact the Council wish to discuss with the Applicant the potential for some appropriate and reasonable mitigation or enhancement measures to address the predicted impacts of the project and cumulative projects on the visual setting of the Wales Coast Path and the Anglesey AONB.	The array area for the offshore wind turbines and OSPs has reduced in size since PEIR and the maximum number of turbines has reduced from 107 to 96, albeit the maximum height of turbines (up to 68 of them) may be 40m taller than that assessed at PEIR. The reduction in the footprint of the offshore components has been driven by a number of factors and as a consequence, is a mitigating factor in terms of the effects of the offshore wind turbines and OSPs on landscape, seascape and visual amenity.	Yes
Mon_072_084_010623	S47	Email	Seascape, Landscape and Visual Resources(a)Section 26.13.5.13 of the Mona PEIR Chapter 26acknowledges that there is "a sense of 'filling' of the area between the North Wales and Northwest England clusters "and that, throughout the operations and maintenance phase of the Mona Wind Farm will be of moderate or major adverse significance on the aesthetic and overall character of the landscape and seascape on the Mona Array Area (and adjacent areas) (see sections 26.13.5.15 and 26.13.6.15). Figure 15.21 of the Morgan PEIR Chapter 15 also highlights the volume of wind farms (beyond Mona, Morecambe and Morgan).	The Applicant notes your response	Yes
Mon_072_085_010623	S47	Email	(b)Stena Line's view is that these comments extend beyond matters of aesthetics and character. Rather it is indicative that there is overcrowding of wind farms (including but not limited to Morgan, Mona and Morecambe) in navigable waters which (as discussed above) will impact Stena Line and other stakeholders in an adverse way (i.e., increased collision and allision risks).	The Applicant notes your response	Yes
Mon_079_001_040623	S42	Email	There are numerous issues but the key ones are (1) the visual impact and other impacts of the proposed Mona substation due to its large scale; (2) the cumulative effect of the proposed Mona substation when considered with other existing and proposed schemes; (3) the proportionality of their impacts all falling on one community; (4) the role of National Grid in determining the scale on which the community will be affected; and (5) the complete absence of any strategic or coordinated	The visual impact of the onshore substation is assessed in Volume 3, Chapter 6: Landscape and Visual Resources (Document Reference F3.6). Cumulative effects of the onshore substation with other existing and proposed schemes in the vicinity are considered within all chapters within Volume 3 (Document Reference F3). The role of National Grid in the selection of the point of interconnection is detailed in Volume 1,	No



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			approach to the planning of large-scale projects making important contributions to the future of renewables and net zero, but having critical impacts on the small community most impacted by them.	Chapter 4: Site Selection and Consideration of Alternatives (Document Reference F1.4).	
Mon_079_002_040623	S42	Email	(1) The very large scale of the proposed substation is entirely incompatible with and insensitive to the rural landscape of Cefn Meiriadog in which it is proposed to site it. It and its associated infrastructure will have extremely deleterious effects on that landscape, and therefore on our rural community living within it. The visual impact will clearly be extreme, and there will be large and unacceptable impacts on agricultural land and farming businesses, road usage, and other aspects of life in the community. The essential nature of the community will be changed irreversibly.	The effects on landscape character, visual effects and cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document reference J3). As stated in Volume 4, Chapter 4: Human health assessment of the Environmental Statement: "Visual impacts of onshore infrastructure, including the onshore substations, are not expected to be of a scale that could affect population health outcomes'.	Yes
Mon_079_003_040623	S42	Email	(2) The cumulative impact of the Mona proposal taken with other existing and proposed developments is, by extension, even more unacceptable. Cefn Meiriadog has recently seen unprecedented development, and this continues to accelerate alarmingly. The community was once overwhelmingly, and remains predominantly, rural in character, which is why its residents have chosen to live here. With three existing large substations and five large-scale projects currently in development (Awel y Môr, Mona, National Grid substation extension, MaresConnect substation, St Asaph Solar Farm), the cumulative effect is necessarily seriously detrimental, if not completely destructive, to that essentially rural character. Existing substations have already taken up any areas that could be considered as relatively (but by no means completely) unobtrusive through topography and tree cover. The ones currently in development, including Mona, are therefore planned to be in highly visible locations. The numerous large pylons and gantries accompanying them also have a substantial and irreversible impact in themselves.	The cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document Reference J3). The proposed mitigation is shown on the Illustrative Landscape and Ecology Strategy Plan (Figure A.6.4). An outline LEMP has been included in the application (Document Reference J22). As stated in Volume 4, Chapter 4: Human health assessment of the Environmental Statement: "Visual impacts of onshore infrastructure, including the onshore substations, are not expected to be of a scale that could affect population health outcomes'.	Yes
Mon_079_006_040623	S42	Email	(5) Coordination and mitigation. It is clear that a strategic and coordinated approach to the siting of grid connection infrastructure facilities, access routes, congruence with existing built projects, substations, brownfield land where available, etc, is required if the community of Cefn Meiriadog is not to suffer from a profound change to its essential rural character and indeed, in the extreme case, to its existence given that the proposals as they stand will make it an immeasurably less attractive place to live in, to send children to school in, and to spend leisure time in. Where high-impact developments are unavoidable, mitigations such as additional landscaping, partial lowering/burial of substations, tree screening and proper use of the project temporary works budget to create haul roads independent of local village roads for the construction period should be considered. A strategic and coordinated approach is completely lacking at present, resulting in a situation in which Cefn Meiriadog's future is determined by National Grid on purely technical and/or commercial considerations, and by the commercial interests of extremely large projects such as Mona without regard to other major developments taking place in the same extremely small area. There needs be developed locally an initiative similar to those currently active in East Anglia to force a more strategic, coordinated and balanced approach which takes into account the needs of the community actually affected.	Network Design (HND) process as a pathway to 2030 project. Ultimately, NGESO concluded, through the HND process, that	No
			I hope you give these points your due consideration	The effects on landscape character, visual effects and cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document reference J3). An Illustrative Landscape and Ecology Strategy, that includes proposals for landscaping and tree screening has been prepared and is included in the Outline	





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				LEMP (Document J22).	
				The Mona Offshore Wind Project has committed to the use of haul roads that will be independent of local village roads for the construction period. Assessment of potential impacts on the local roads is included within Volume 3, Chapter 8: Traffic and Transport of the Environmental Statement (Document Reference: F3.8).	
Mon_082_007_020623	S44	Email	• We disagree that in Volume 26, Seascape, Landscape and Visual Resources item 26.16.3.6 (page 148) that private views are not considered further, our private view and aspect does matter and will be significantly impacted both during construction and operation.	Private views are not a planning matter unless the effects are over and above substantial adverse.	No
Mon_082_008_020623	S44	Email	Page 250 of the same report, table 26.31 shows a number of visual receptor groups, none of these reflect the true visual representation for Tyddyn Meredydd, in fact, they seem to consider transient traffic as opposed to permanent residents like ourselves. The magnitude of impact for Tyddyn Meredydd is High and Sensitivity is High	It is a requirement of the guidance that representative views have to be from publicly accessible locations only	No
Mon_082_009_020623	S44	Email	On Page 337 viewpoint 2.3 our property Tyddyn Meredydd is in the view between the viewpoint and the substation option2 indicative footprint. This actually shows how our property will be seriously dwarfed and no amount of mitigation (circa 15-20 years) is going to make this acceptable.	The effects on landscape character, visual effects and cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline LEMP (Document J22).	No
Mon_082_012_020623	S44	Email	PEIR Non-Technical Summary item 1.9.1.7 states: A significant adverse landscape is predicted during the construction, operations and maintenance for land within the onshore substation area, this will directly affect immediate landscape receptors. o In the case of onshore substation 2 then Tyddyn Meredydd is one of these immediate landscape receptors.	In EIA terms, a house is not a landscape receptor. If a building is listed it is a heritage asset and considered in Volume 3, Chapter 4 Historic Environment of the Environmental Statement.	No
Mon_085_002_040623	S47	Email	2. Visual Impact. Scale of project completely inappropriate to the landscape and community in which it is proposed to site it. Will have seriously deleterious effects on the landscape of Cefn Meiriadog whichever substation site is chosen.	The effects on landscape character, visual effects and cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline LEMP (Document J22).	Yes
Mon_085_004_040623	S47	Email	4. Cumulative Impact. Mona's impacts on landscape and community are being treated in isolation, whereas it is only one of numerous major projects, existing or in planning/development, whose impacts will be felt most severely in Cefn Meiriadog. The cumulative impact must be taken into account in any meaningful consultation on and assessment of how the project affects the community. People's lives and a community's character are being changed irreversibly.	Cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement.	No
Mon_085_007_040623	S47	Email	7. The location of the Mona wind farm will mean that in the entire eastern portion of the coastline of north Wales, from Talacre to Llandudno, approximately 30 miles, it will no longer be possible to look out to sea and see the horizon unimpeded by wind turbines. That is a great spiritual and psychological loss to the people of north Wales.	The Applicant notes your response and recognises the impact the project may have for those looking out to sea. The layout for the offshore wind turbines and OSPs has reduced in size albeit the turbines will be 40m taller than that assessed at PEIR. The reduction in the footprint of the offshore components has been driven by a number of factors and as a consequence, is a	No





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				mitigating factor in terms of the effects of the offshore wind turbines and OSPs on landscape, seascape and visual amenity.	
				Issues of seascape influencing community identity are discussed Volume 4, Chapter 4 Human Health of the Environmental Statement.	
Mon_106_001_030523	S47	FREEPOST	Dear Sirs With reference your wind project Mona. This development should be outlawed. It is not in the interests of this Island to disrupt all our lives, shipping, deliveries, visitors. Whoever thought up the scheme must be very short sighted for Islanders. Find other alternatives & leave the Irish Sea alone please.	The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancelations. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on lifeline ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (volume 6, annex 7.1) and Environmental Statement Chapter (volume 2, chapter 7) submitted as part of the Application.	Yes
Mon_107_001_010623	S47	FREEPOST	The letter write is a Manx born Island resident. I have expensive experience of passenger consultations having been Chair of the Rail Passengers Committee for North West England from 1998-2005 and Chair of TravelWatch Isle of Man from 2007-2022. Consequently, when I refer to the views of passengers, I am reflecting on long experience of listening to and reading about passenger views.	The Applicant notes your response.	No
Mon_108_005_010623	S44	Feedback form	2. It will be too close to residential properties on Glascoed Road, we can see across to the area and even with screening we feel it would be seen.	The effects on landscape character, visual effects and cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline LEMP (Document J22).	No
Mon_108_012_010623	S44	Feedback form	9. If Option 7 were to go ahead, and I sincerely hope it doesn't, I would expect the company to pay for landscaping in my garden so I don't see the atrocities (transformers 20mtrs high) from my back garden. We have worked hard all our lives to purchase our home and bought it because of the surrounding countryside behind and beyond only for you to consider taking it away from us and our children's inheritance. Please, please choose Option 2 and make us very happy retirees. Option 2 has fewer residential properties and would be cheaper for you and less impact on the environment as it is nearer to the existing substation, your 'highways' are already in place and its closer to the National Grid connection.	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference: F1.4)	Yes





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Mon_123_001_100723	S42	Email	Thank you for the opportunity to comment on the above scheme. Llanfairfechan is quite a long way from the potential turbines so the visual effect will be small. We strongly agree with the need for marine wind turbines as part of the renewable energy we need to reduce our reliance on fossil fuels and try to meet our net zero carbon targets.	The Applicant notes your response.	Yes
Mon_126_006_210423	S47	Feedback form	Unlikely to be visually intrusive.	The Applicant notes your response.	No
Mon_131_005_280423	S47	Feedback form	and quite frankly they are an eyesore that has ruined the Welsh coastline	The SLVIA concludes there would be no significant effects on any seascape, landscape, or visual receptors as a result of the Mona Array Area either during construction, operation, or decommissioning, and finds no significant effects on the Clwydian Range and Dee Valley AONB nor visual receptors within it as a result of the Mona Onshore Development Area. See Volume 2, Chapter 8 Seascape and visual resources and Volume 3, Chapter 6 Landscape and visual resources for further detail.	No
Mon_132_003_030523	S47	Feedback form	The existing Wind Turbines in the Irish sea are already visually intrusive - this proposal will compound that problem	The SLVIA concludes there would be no significant effects on any seascape, landscape, or visual receptors as a result of the Mona Array Area either during construction, operation and maintenance, or decommissioning, and finds no significant effects on the Clwydian Range and Dee Valley AONB nor visual receptors within it as a result of the Onshore Development Area.	No
Mon_135_001_170523	S47	Feedback form	This will be an eyesore - spoiling the Douglas views	The Seascape, Landscape and Visual Impact Assessment (presented in Volume 2, Chapter 8: Seascape and visual resources of the Environmental Statement and Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement) concludes there would be no significant effects on any seascape, landscape, or visual receptors as a result of the Mona Array Area either during construction, operation and maintenance, or decommissioning.	No
Mon_135_002_170523	S47	Feedback form	Eyesore	The Seascape, Landscape and Visual Impact Assessment (presented in Volume 2, Chapter 8: Seascape and visual resources of the Environmental Statement and Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement) concludes there would be no significant effects on any seascape, landscape, or visual receptors as a result of the Mona Array Area either during construction, operation and maintenance, or decommissioning.	No
Mon_135_003_170523	S47	Feedback form	Eyesore	The Seascape, Landscape and Visual Impact Assessment (presented in Volume 2, Chapter 8: Seascape and visual resources of the Environmental Statement and Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement) concludes there would be no significant effects on any seascape, landscape, or visual receptors as a result of the Mona Array Area either during construction, operation and maintenance, or decommissioning.	No
Mon_135_004_170523	S47	Feedback form	Too near the mainland - an eyesore	The Seascape, Landscape and Visual Impact Assessment (presented in Volume 2, Chapter 8: Seascape and visual resources of the Environmental Statement and Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement) concludes there would be no significant effects on any seascape, landscape, or visual	No





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				receptors as a result of the Mona Array Area either during construction, operation and maintenance, or decommissioning.	
Mon_148_001_260523	S44	Feedback form	Am unhappy about the position of the substation, my property will overlook this project, the position is right behind my property.	The Applicant notes your response.	No
				Full details of the onshore substation site selection process can be found in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives in the Environmental Statement (Document Reference: F1.4).	
Mon_148_002_260523	S44	Feedback form	Would be able to see this from my property.	The Applicant notes your response	No
Mon_149_001_260523	S47	Feedback form	The residents of Glascoed, St Asaph are extremely concerned at the number of substations and related infrastructure which is being allocated to a very small area. It would appear that all the offshore power connections will terminate at St Asaph. The substations will be the size of 12 football pitches according to reports. This will deface a great deal of open countryside.	Cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The effects on landscape character, visual effects and cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline LEMP (Document J22).	No
Mon_149_004_260523	S47	Feedback form	Cable routes will need to be hidden and not disruptive to residents.	The onshore cable route has been refined to avoid impacts to residents where possible. All onshore cables will be buried underground.	Yes
Mon_153_002_280523	S47	Feedback form	The Irish Sea is a beautiful landscape that will be visually impacted by these additional windfarms. The present ones impact of the sea views from the Isle of Man to the Cumbria and Lancashire coastlines. The tidal flow affected by the placement of the turbines could severely impact on the Manx coastline	Volume 2, Chapter 8: Seascape and visual resources chapter of the Environmental Statement presents an assessment of the project on the surrounding seascape. The Physical Processes assessment in Volume 2, Chapter 1: Physical processes chapter assesses the influence of infrastructure on tidal currents using numerical modelling studies.	
Mon_157_002_010623	S42	Feedback form	In that regard, para 1.9.1.6 of the Mona Offshore Wind Project / Non-technical summary notes that; "No significant effects are predicted during the construction, operations and maintenance and decommissioning phases of the Mona Offshore Wind Project on nationally designated landscapes, namely Eryri National Park, Anglesey AONB and the Clwydian Range and Dee Valley AONB. The assessment concludes that the special qualities of these nationally designated landscapes would remain intact, and the Mona Offshore Wind Project would not conflict with or compromise the reasons for their designation." The Authority do not wish to raise any objections provided there are no significant effects on the National Park. However, the Authority have not undertaken their own independent assessment of the proposal and therefore rely on the developer, Äôs own assessment, along with NRW, Äôs appraisal of this assessment.	The Applicant notes your response	No
Mon_157_003_010623	S42	Feedback form	From an ENPA viewpoint, we think it, its worth expressing our views, and slight concerns at this point, about the scale of this development and in particular the cumulative effect in combination with existing developments at Gwynt y Môr, Rhyl Flats, North Hoyle and the potential for the large scale development at Awel y Môr. The 'cone' of sight being taken up currently from viewpoints within the National Park was already going to be increased substantially following the potential Awel y Môr development (in addition to current wind farms), and the Mona project will add to that.	The cumulative visual effect of the Mona Offshore Wind Project and other projects have been assessed in Volume 2, Chapter 8: Seascape and Visual Resources of the Environmental Statement	





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			The current turbines at Gwynt y Môr are 150m to tip height, and there are around 160 turbines. For Rhyl Flats there are 25 turbines. The proposed development at Awel y Môr is for between 34 and 50 turbines, with a proposed		
			maximum tip height of 332m. The obvious point to make is that the tip height of the proposed turbines are more than double the height of the existing turbines at Gwynt y Môr.		
Mon_157_004_010623	S42	Feedback form	This would also appear to be the case for the Mona Offshore Wind farm, in that there would be significantly larger turbines being built in comparison to the already numerous turbines in the bay. From discussions it was noted that there are plans for around 107 wind turbines (although 26.10.11 of the 'Preliminary Environmental Information Report; Volume 4, Chapter 26: Seascapes, landscape and visual resources' notes this to be 68), ranging from between 293m to 324m in height, with the main impacts being considered including fisheries, shipping, SLVIA, socio-economic and tourism/recreation. It is noted on page 15 of the 'Preliminary Environmental Information Report; Volume 4, Chapter 26: Seascapes, landscape and visual resources, that "The Mona offshore wind project array will be visible from the Eryri National Park" therefore we feel it is justified to raise some concerns at this point regarding the number of, and size of turbines' even against the conclusion that there will be no significant effects.	The Applicant notes your response	No
Mon_157_005_010623	S42	Feedback form	The National Park's concerns lie with the topic of SLVIA. We appreciate however that the main difference (and potentially one that would make this project less impactful than the one at Awel y Môr) is the increased distance of the offshore site from the north Wales coast; therefore lessening the potential landscape and visual impacts. However concerns do remain about the number of turbines, their height, and the cumulative impact and congestion that there will be off the north Wales coast.	The impacts of the Mona Offshore Wind Project on Seascape, Landscape and Visual effects are assessed fully within Volume 2, Chapter 8: Seascape and visual resources of the Environmental Statement and Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. This includes effects on national parks and factors in the distance from the Mona Array Area to the nearest coast (28.8 km to Anglesey), and also considers the cumulative impact from the Mona Offshore Wind Project alongside other existing and planned wind farms in the east Irish Sea.	No
Mon_157_006_010623	S42	Feedback form	To conclude, as previously mentioned we accept and respect the assessment that "no significant effects are predicted during the construction, operations and maintenance and decommissioning phases of the Mona Offshore Wind Project on nationally designated landscapes, namely Eryri National Park". It is noted that the proposed development area is approx. 35km from Eryri National Park and we also support suitable renewable energy developments for the reasons also mentioned previously.	The Applicant notes your response	No
Mon_157_007_010623	S42	Feedback form	We are also of the view that, from a landscape and visual point of view, that this proposal (due to the distance) will have far lesser impact to the National Park than the proposed development at Awel y Môr. However we also just felt we should highlight and bring to attention some of the concerns at this point.	The Applicant notes your response	No
Mon_158_001_020623	S44	Feedback form	The main concerns are the legacy that Mona will leave on Cefn Meiriadog and neighbouring St Asaph. The proposed 30 acre onshore substation is completely incompatible with the rural area chosen by BP/NG, for either of the remaining option locations, 2 or 7. Visual impact will be so severe that no amount of mitigation will prevent visual destruction of our country landscape.	The effects on landscape character, visual effects and cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline LEMP (Document J22).	No
Mon_158_003_020623	S44	Feedback form	The area has significant infrastructure already in situ from NSIP's or associated requirements - Gwynt y Mor, Burbobank extension, National Grid, Scottish Power. There are already FOUR very large substations all within a few hundred yards of each other. Underground cabling, a 16MW STOR gas fired power station to back up to the grid. Now - proposals for at least 5 more developments Awel y Môr, Mona, St Asaph Solar Farm, Mares	The onshore EIA and cumulative effects assessment is presented in relevant topic chapters within Volume 3 of the Environmental Statement. The projects, plans and activities considered for the cumulative effects assessment are presented	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			Interconnect, National Grid substation extension and upgrading of associated National Grid infrastructure - further decimation of our rural outlook. Cumulatively, this is excessive for a relatively compact area. With each new piece of proposed infrastructure, there appears to be less concern on the community destruction. Practically, there is less space available each time, so the increasingly large substations become more visible due to crowding. It is truly shocking.	in Volume 5, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement.	
Mon_158_021_020623	S44	Feedback form	Mona Project will have extreme negative effects forever on the AMENITY of Cefn Meiriadog, destroying the quality and character of the area and the elements that currently contribute to the overall enjoyment of the area.	The effects on landscape character, visual effects and cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline LEMP (Document J22).	Yes
Mon_167_001_190423	S47	Consult Online	Besides wind farms being unsightly and detrimental to wildlife. With insignificant benefits I say No No AND NO!!!	The Applicant notes your response. However, it believes the generation of renewable energy brings a range of benefits to its host communities such as job creation, supply chain opportunities, skills growth and the chance to contribute to the generation of renewable energy.	No
Mon_172_001_210423	S47	Consult Online	This is a massive piece of work with a huge impact on what our land will look like afterwards not to mention the distribution. It is also disturbing several significant archaeological sites, and sites of scientific interest. Please do not do this	The impacts of the Mona Offshore Wind Project on archaeological sites are assessed in Volume 3, Chapter 5: Historic environment of the Environmental Statement. The impacts on ecological receptors (including designated sites) are assessed in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement.	No
Mon_172_002_210423	S47	Consult Online	This is a massive piece of work with a huge impact on what our land will look like afterwards not to mention the distribution. It is also disturbing several significant archaeological sites, and sites of scientific interest. Please do not do this	The impacts of the Mona Offshore Wind Project on archaeological sites are assessed in Volume 3, Chapter 5: Historic environment of the Environmental Statement. The impacts on ecological receptors (including designated sites) are assessed in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement.	No
Mon_172_003_210423	S47	Consult Online	This is a massive piece of work with a huge impact on what our land will look like afterwards not to mention the distribution. It is also disturbing several significant archaeological sites, and sites of scientific interest. Please do not do this	The impacts of the Mona Offshore Wind Project on archaeological sites are assessed in Volume 3, Chapter 5: Historic environment of the Environmental Statement. The impacts on ecological receptors (including designated sites) are assessed in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement.	No
Mon_189_002_020623	S47	Consult Online	I am worried that you are planning a substation in an area of outstanding beauty. You are going to destroy the stunning landscape which is populated by a large amount of wildlife.	The visual effects of the Mona Onshore Substation are assessed in section 6.11.2 of Volume 3, Chapter 6: Landscape and visual resources, of the environmental Statement. The Mona Onshore Substation does not lie within the Clwydian Range. The effects on views from the Clwydian Range and Dee Valley National Landscape are assessed in section 11.1 Volume 3, Chapter 6: Landscape and visual resources, of the environmental Statement. The effects of the whole project (onshore and offshore assets) on the special qualities of the National Landscape are in Volume 6, Annex 8.5: International and nationally designated landscapes, of the Environmental Statement.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_190_001_020623	S47	Email	If the project was to be in the field directly behind the park it would be a blog on the landscape and the noise and dust etc would cause our static owners no end of distress	The Applicant notes your response. Onshore Substation Option 2 is the final onshore substation location that has been taken forward. Mitigation measures to manage construction impacts including noise and dust are included in the Outline CoCP (document reference J26) and measures to mitigate impacts to the landscape are included in the Outline Landscape and Ecological Management Plan (Document Reference J22).	No
Mon_190_003_020623	S47	Email	in short / long term de, value the statics and the sitethe owner wants to stress his clear objections to it been directly behind and on full view from the owners statics	Noted and received.	No
Mon_194_002_030623	S47	Email	I will provide seven links to short and easy to follow videos which covers each of the reasons why I believe these types of developments are not required. I am referring to all three of the above development options. I object also to any proposals that blot the landscape with eye sores such as these offshore projects or otherwise.	The Applicant notes your response. To see visualisations of the array area, please see Volume 6, Annex 8.6: Seascape visualisations Environmental Statement (Document Reference F6.8.6).	No
Mon_196_003_010623	S44	FREEPOST	The decimation of the countryside will be catastrophic; fields, trees, hedgerows and major disruption to wildlife habitats.	A full assessment of impacts on onshore ecology is assessed in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement alongside details of the proposed mitigation measures that will be implemented to reduce the impacts.	No
Mon_196_008_010623	S44	FREEPOST	I was informed by one of the staff at the one of the meetings sites that outsize trees could not be planted and mature trees would be used and then had to grow to shield the site, I would be deceased before the screening is effective. I beg to differ and if you look on the Countrylife Website: Planting big tress: What you need to know you will find outsize trees can be planted successfully.	The effects on landscape character, visual effects and cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline Landscape and Ecological Management Plan (Document J22).	No
Mon_197_017_190623	S44	FREEPOST	As we know from earlier this building is proposed to be 20m high, well above the current landscape vista of mature trees of 10 to 12m tall.	The Mona Onshore Development Area has been refined following the Preliminary Environmental Information Report (as documented in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement). Onshore substation option 7 has been removed and the onshore substation site and temporary working area have been reduced in size and the maximum height of the substation has been reduced to 15m. Impacts on landscape and visual amenity are assessed in Chapter 3, Volume 6 Landscape and visual resources of the Environmental Statement.	Yes
Mon_197_018_190623	S44	FREEPOST	The proposed substation No 7 is to have a new road constructed off Glascoed Road for the construction of said substation, as a road for construction and maintenance after construction, as the existing road to Cefn from St Asaph is not suitable. This road will be in full view of Upway and the neighbouring properties, more so as there will be an elevated section to cross the valley which contains a water course.	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference F1.4)	Yes
Mon_197_019_190623	S44	FREEPOST	REDACTED Item 11 Attached Substation No 7 The attachment is the view looking directly south from the above address. I am aware under planning we do not have a right to a view.	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference F1.4)	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_197_022_190623	S44	FREEPOST	The road to Cefn from St Asaph, forms part of the North Wales Pilgrims way, 134 miles long from Basingwerk Abbey to Bardsey Island, the proposed access to the substation will involve crossing this along with the cables to and from the said substation, no reference that I could see in your documentation	Onshore Substation Option 7 has been discounted following the statutory consultation. The Environmental Statement only considers Onshore Substation Option 2, as per the announcement newsletter in Autumn 2023. Please see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives for more details (Document Reference: F1.4)	Yes
Mon_201_001_190623	S44	Email	On the basis that I have followed the information in the pack, I am submitting our views on the project, I hope that they are included in the general response. • REDCATED Manage a land and property portfolio, which is centred upon the town of Llandudno. Llandudno is an international tourism destination, admired across world for its unique Victorian outlook, and surrounded by spectacular scenery, the sea, and mountains. Llandudno is a serviced accommodation hub for the whole of N Wales. It offers circa 14,000 bed nights, and with its central location, visitors travel and visit the whole of N Wales. There is real danger that with an increased number of wind turbines off the coast of Llandudno, the USB if the town (its setting of sea and mountains) is undermined, and visitors look elsewhere to stay, rather than having a view of an industrial sea landscape.	Socio-economics of the Environmental Statement. Impacts on landscape and visual amenity are assessed in Chapter 3, Volume 6 Landscape and visual resources of the Environmental Statement.	No
Mon_201_002_190623	S44	Email	N Wales is a dark skies designated area, with several years of work, then masts in the sea which are permanently lit up, all go to ruining the dark skies, which the region has fought so hard to achieve.	A full assessment of Seascape, Landscape and Visual Effects, including effects from wind turbine lighting, has been carried out and presented in Volume 2, Chapter 8: Seascape and visual resources of the Environmental Statement and Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. As set out in the draft Development Consent Order the lights will be installed in line with the requirements of aviation consultees such as the MoD and CAA. However, the lights will be operated at the lowest permissible lighting intensity level.	No

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D.25.26 Aviation and radar table of responses



Table D.25. 26: Aviation and radar table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_069_285_010623	S42	Email	Chapter 27 Aviation and Radar (Ronaldsway Airport) As an airport, we take the safety and security of our passengers, employees, and aircraft very seriously, and we understand that the development of offshore	Engagement with IoM Ronaldsway Airport (IoM Airport) is continuing to reach a mutually agreed mitigation solution which will reduce any impact to acceptable levels.	No
Mon_069_286_010623	S42	Email	wind farm can potentially impact aviation safety. To ensure the safety of aircraft operating in the vicinity of offshore wind farms, it is essential that appropriate mitigation measures are put in place to ensure that any potential impacts on aviation safety are identified and addressed. This includes conducting thorough impact assessments, technical safeguarding assessments of aerodrome navigation systems, developing appropriate mitigation measures, and regularly monitoring the wind farm's impact on aviation	A detailed technical safeguarding assessment has been completed. This includes analysis of Instrument Flight Procedures (IFP) published by the IoM Airport. Radar Line of Sight analysis predicts an impact to the IoM Airport Primary Surveillance Radar (PSR) system. Engagement with IoM Airport is continuing to reach a mutually agreed mitigation solution which will reduce any impact to acceptable levels.	No
Mon_071_019_020623	S42	Email	safety to ensure that these measures remain effective. Helicopter activity It is difficult to quantify the level of impact helicopter usage during the construction and operation of the Mona Offshore Wind Project. It is noted that the PEIR highlights that there may be 2 helicopter supports completing 365 return trips during installation works. No heliport site(s) or transit route(s) have been identified within the PEIR documentation.	Noted. Helicopter operations will be conducted in Class G (uncontrolled airspace) in Visual Meteorological Conditions (VMC) under normal Rules of the Air and the 'See and Avoid' principle. Daily construction, operation & maintenance helicopter movements, conducted below 5,000 ft above mean sea level (amsl), are likely insignificant compared to current Irish Sea Class G aviation activity. Heliport site(s) yet to be confirmed.	No
Mon_072_087_010623	S47	Email	We would appreciate if more information on this could be provided so we can properly understand and respond to the potential impacts and mitigations being proposed. (b) Morecambe PEIR Chapter 16 at section 16.202 states: "Aviation lighting fitted to offshore WTGs could cause confusion to the maritime community as the specification for the lighting to be displayed below the horizontal plane of the light filament itself could cause mariners some confusion. This confusion could result in WTGs with conflicting warning lighting representing a collision risk to maritime surface vessels." (emphasis added)	Marking and lighting plan will be agreed with all relevant stakeholders	Yes
Mon_072_088_010623	S47	Email	(c) Firstly, it is noted that this observation was not made in the corresponding Mona or Morgan Offshore Generation Assets PEIR Submissions, which creates concern as to whether the Mona and Morgan Offshore Wind Farms have taken this problem into consideration (and are therefore taking steps to mitigate the risks involved).	Marking and lighting plan will be agreed with all relevant stakeholders	Yes
Mon_072_089_010623	S47	Email	(d) Secondly, Stena Line notes that any confusion as to the identity/purpose of a warning light poses a serious navigational risk to all marine traffic, including Stena Line's vessels. It is paramount that a full consultation in respect of the use of lights on the WTGs is sought however, it is not clear as to who (if anyone) has been consulted on this point. More details are needed for Stena Line and the wider maritime community to provide input as to the safety of the new proposed aviation lighting. While it is acknowledged that the second round of Navigation Simulation exercises in May 2023 attempted to simulate the night-time visual effect of such an array of red warning lights, Stena Line notes that it would be unrealistic to expect any simulator to be able to provide a true visualisation of what this may look like in a real-world scenario.		Yes
Mon_072_090_010623	S47	Email	(e) Thirdly, Stena Line expresses its concern that navigation lights on the wind turbines may risk interfering with vessels' ability to identify other navigation lights and impact their ability to manoeuvre safely. The difficulty posed by background lights when navigating vessels at night is recognised by COLREGs Rule 6(iv).	Marking and lighting plan will be agreed with all relevant stakeholders. On the basis of stakeholder feedback, night simulations were included within the 2023 navigation simulation sessions conducted with ferry companies and reported within the updated NRA (volume 6, annex 7.1) and shipping and navigation chapter (volume 2, chapter 7) of the Environmental Statement.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_078_001_050623	S47	Email	Good afternoon I'd like to register Isle of Man Airport's interest in your wind projects, on the grounds of flight safety. Please ensure that IOM Airport is on your consultation list.	Engagement with IoM Ronaldsway Airport (IoM Airport) is continuing to reach a mutually agreed mitigation solution which will reduce any impact to acceptable levels.	Yes
			Many thanks Helen		
Mon_162_016_040623	S47	Feedback form	RAF Anglesey would have contingency arrangements already in place, same for commercial flights from Valley	RAF Valley was considered in the establishment of the potential effect the project may have on this operation. Consultation with the Defence Infrastructure Organisation (DIO) whom safeguard RAF Valley has been completed. DIO has stated that they do not anticipate impact to RAF Valley operations.	No
Mon_163_001_040623	S47	Feedback form	As already identified in the Civil and Military aviation and radar report the development of the offshore windfarm will have an impact on the Minimum safety altitude currently used by Blackpool Airport. It is also likely that the development with have an impact on current and planned instrument flight procedures (IFPs) to Blackpool Airport. The airport seeks reassurance that the development of the offshore project will not impact the MSAs and/or current or planned IFPs.	Engagement with the airport will continue towards reaching a suitable and mutually agreeable mitigation solution to nullify the predicted impact to Blackpool Airport.	Yes
Mon_165_001_040623	S47	Feedback form	Liverpool Airport concurs with EnBW's Aviation Consultant that the proposed turbines do not represent obstacles (OLS & IFP) to aircraft using Liverpool Airport (Appendix B: Instrument Flight Procedure (IFP) Assessment Part 3), but they would have a detrimental impact on its radar system, (Chapter 27. 1.3.5.7 & Figure 1.8) such that mitigation is required to be provided by the developer prior to the erection of any of the turbines. In the circumstances Liverpool Airport requests a holding objection to the proposals subject to the imposition of an appropriate condition(s) and or legal agreement to secure the mitigation for the radar. Liverpool Airport looks forward to working with EnBW and its Aviation Consultants in identifying a suitable mitigation to the impact the Mona Windfarm will have on the Liverpool Airport radar.	Engagement with Liverpool Airport is continuing to reach a mutually agreed mitigation solution which will reduce any impact to acceptable levels.	Yes
Mon_200_001_241123	S44	Email	The nearest weather radar is approximately 108 km distant at Hameldon Hill. The proposed turbines may be detectable by the radar but will be below the main beam at its lowest elevation, therefore the impact will be limited. We have no objections to the proposal but wish to be kept informed of progress, in particular please notify us when the windfarm becomes operational.	Response received and no objection noted.	Yes
Mon_202_001_230623	S42	Email	I write to confirm the safeguarding position of the Ministry of Defence (MOD) in relation to the request made by the applicant for comment on Preliminary Environmental Information Report (PEIR). This project includes provision for the construction, operation, maintenance and decommissioning of an offshore wind farm located in the east Irish Sea, 28.2km from the Anglesey Coastline.	Response received and noted.	Yes
Mon_202_002_230623	S42	Email	The development would comprise the following infrastructure components: up to 107 wind turbine generators (with a maximum blade tip height of 324 metres above Lowest Astronomical Tide (LAT)). In addition to the turbine structures there will be foundations and support structures, scour protection and cable protection, inter-array cables, interconnector cables, offshore substation platforms, offshore export cables, offshore booster substation and cable landfall. The landfall will be located along the north coast of Wales.	Response received and noted.	Yes
Mon_202_003_230623	S42	Email	The PEIR recognises the principal defence issues that could be impacted by the progression of the proposed development. In Chapter 27: Aviation and Radar	Response received and noted.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			(April 2023) of the PEIR. The use of airspace in the vicinity of the proposed development for defence purposes has been appropriately identified and considered, the requirement to supply sufficient information to allow accurate charting of the development and for the installation of appropriate aviation safety lighting is addressed in Table 27.1 Summary of the NPS EN-1 and NPS EN-3 provisions relevant to aviation and radar. The mandatory requirements set out in Civil Aviation Authority publication CAP 393 for aviation safety lighting are specifically referenced.		
Mon_202_004_230623	S42	Email	The PEIR details the potential for radar systems to be affected by the proposed wind farm, highlighting the potential for the development to be within radar line of sight (RLoS) of radar systems at Warton and RAF Valley. I can confirm that we do not anticipate that the development would have an operational impact on either of the identified radars.	No operational impact to Warton & RAF Valley radar noted.	Yes
Mon_204_010_020623	S42	Email	Helicopter activity It is difficult to quantify the level of impact helicopter usage during the construction and operation of the Mona Offshore Wind Project. It is noted that the PEIR highlights that there may be 2 helicopter supports completing 365 return trips during installation works. No heliport site(s) or transit route(s) have been identified within the PEIR documentation. We would appreciate if more information on this could be provided so we can properly understand and respond to the potential impacts and mitigations being proposed.	Noted. Helicopter operations will be conducted in Class G (uncontrolled airspace) in Visual Meteorological Conditions (VMC) under normal Rules of the Air and the 'See and Avoid' principle. Daily construction, operation & maintenance helicopter movements, conducted below 5,000 ft above mean sea level (amsl), are likely insignificant compared to current Irish Sea Class G aviation activity. Heliport site(s) yet to be confirmed; further information can be provided in regard to helicopter support operations when he mode of operation has been decided.	
Mon_205_013_020623	S42	Email	Helicopter activity It is difficult to quantify the level of impact helicopter usage during the construction and operation of the Mona Offshore Wind Project. It is noted that the PEIR highlights that there may be 2 helicopter supports completing 365 return trips during installation works. No heliport site(s) or transit route(s) have been identified within the PEIR documentation. We would appreciate if more information on this could be provided so we can properly understand and respond to the potential impacts and mitigations being proposed.	Noted. Helicopter operations will be conducted in Class G (uncontrolled airspace) in Visual Meteorological Conditions (VMC) under normal Rules of the Air and the 'See and Avoid' principle. Daily construction, operation & maintenance helicopter movements, conducted below 5,000 ft above mean sea level (amsl), are likely insignificant compared to current Irish Sea Class G aviation activity. Heliport site(s) yet to be confirmed; further information can be provided in regard to helicopter support operations when he mode of operation has been decided.	
Mon_206_008_020623	S42	Email	It is difficult to quantify the level of impact helicopter usage during the construction and operation of the Mona Offshore Wind Project. It is noted that the PEIR highlights that there may be 2 helicopter supports completing 365 return trips during installation works. No heliport site(s) or transit route(s) have been identified within the PEIR documentation. We would appreciate if more information on this could be provided so we can properly understand and respond to the potential impacts and mitigations being proposed.	Noted. Helicopter operations will be conducted in Class G (uncontrolled airspace) in Visual Meteorological Conditions (VMC) under normal Rules of the Air and the 'See and Avoid' principle. Daily construction, operation & maintenance helicopter movements, conducted below 5,000 ft above mean sea level (amsl), are likely insignificant compared to current Irish Sea Class G aviation activity. Heliport site(s) yet to be confirmed; further information can be provided in regard to helicopter support operations when he mode of operation has been decided.	
Mon_206_017_020623	S42	Email	Helicopter activity It is difficult to quantify the level of impact helicopter usage during the construction and operation of the Mona Offshore Wind Project. It is noted that the PEIR highlights that there may be 2 helicopter supports completing 365 return trips during installation works. No heliport site(s) or transit route(s) have been identified within the PEIR documentation. We would appreciate if more information on this could be provided so we can properly understand and respond to the potential impacts and mitigations being proposed. Emergency response We would be happy to discuss with you appropriate communication and collaboration between Walney 3 and 4, Mona Offshore Wind Project, and other nearby offshore wind developments in circumstances where emergency responses are required, for example in the event of accidents or pollution spills.	Noted. Helicopter operations will be conducted in Class G (uncontrolled airspace) in Visual Meteorological Conditions (VMC) under normal Rules of the Air and the 'See and Avoid' principle. Daily construction, operation & maintenance helicopter movements, conducted below 5,000 ft above mean sea level (amsl), are likely insignificant compared to current Irish Sea Class G aviation activity. Heliport site(s) yet to be confirmed; further information can be provided in regard to helicopter support operations when he mode of operation has been decided. The offer of a collaborative approach to emergency cooperation (within in a consolidated Irish Sea Offshore Wind Emergency Response and Cooperation Plan (ERCoP) is both welcome and logical.	
Mon_207_010_020623	S42	Email	Helicopter activity It is difficult to quantify the level of impact helicopter usage during the	Noted. Helicopter operations will be conducted in Class G (uncontrolled airspace) in Visual Meteorological Conditions (VMC) under normal Rules of	Yes





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Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			construction and operation of the Mona Offshore Wind Project. It is noted that the PEIR highlights that there may be 2 helicopter supports completing 365 return trips during installation works. No heliport site(s) or transit route(s) have been identified within the PEIR documentation. We would appreciate if more information on this could be provided so we can properly understand and respond to the potential impacts and mitigations being proposed.	the Air and the 'See and Avoid' principle. Daily construction, operation & maintenance helicopter movements, conducted below 5,000 ft above mean sea level (amsl), are likely insignificant compared to current Irish Sea Class G aviation activity. Heliport site(s) yet to be confirmed; further information can be provided in regard to helicopter support operations when he mode of operation has been decided.	
Mon_207_013_020623	S42	Email	Radar We would like to understand better from you your proposed radar mitigation solutions to ensure that they do not adversely affect the solutions currently in place for Burbo Bank Extension.	Noted. Response received. Burbo Extension is considered as part of the baseline in Volume 4, Chapter 1: Aviation and radar of the Environmental Statement	Yes



D.25.27 Climate change table of responses



Table D.25. 27: Climate change table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_069_288_010623	S42	Email	Chapter 28 Climate Change The PEIR report is comprehensive and ties into UK National Planning policy, plus energy and climate policy	The Applicant notes your response.	No
Mon_069_289_010623	S42	Email	The GHG emissions are clearly stated across each stage, construction, operation and decommissioning	The Applicant notes your response.	No
Mon_069_290_010623	S42	Email	The whole-life avoided-emissions are clearly stated and show that the developments, despite being emitters, are positive for overall global emissions when comparing them to fossil fuels	The Applicant notes your response.	No
Mon_069_291_010623	S42	Email	Adaptation risks have been considered.	The Applicant notes your response.	No
Mon_069_292_010623	S42	Email	The PEIR report is a fair and reasonable assessment.	The Applicant notes your response.	No
Mon_069_293_010623	S42	Email	In addition, noting the concerns regarding the potential effects on shipping and navigation route as a result of this proposed development; from a climate change point of view the shipping and navigation section seems to be well assessed, and since ferries are by far the lowest emitting way to travel to and from the Island, it is very important that these routes are not significantly affected by this development proposal.	The Applicant notes your response.	No
Mon_069_318_010623	S42	Email	Climate Change 1.8.5.3 It is proposed that transboundary impacts on climate change are screened into the EIA process. NOTED. This comment is also relevant to those made in respect of the Commercial Fisheries chapters.	The Applicant notes your response.	No
Mon_072_091_010623	S47	Email	Climate Change (a)Stena Line acknowledges that the Wind Farms will likely have an overall beneficial effect in respect of climate change.	The Applicant notes your response.	No
Mon_072_092_010623	S47	Email	b) However, the figures estimated do not provide an accurate and complete assessment of the cumulative or individual impact of the Mona, Morecambe and Morgan Offshore Wind Farms on direct/indirect greenhouse gas emissions ("GHG Emissions"):	GHG emissions are not bound by geographical boundaries. Consequently, cumulative effects due to other specific local development projects are not individually considered but are taken into account when considering the impact of the Mona Offshore Wind Project by defining the atmospheric mass of GHGs as a high sensitivity receptor. This is in accordance with IEMA guidance on Assessing Greenhouse Gas Emissions and Evaluating their Significance (IEMA, 2022). Consideration has been given to the indirect impact of route deviation within the greenhouse gas technical report (Volume 8, Annex 2.1: Technical greenhouse gas assessment) and has been considered in the operations and maintenance assessment (section 2.10.6). This draws on information presented within Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement and the navigation risk assessment (Volume 6, Annex 7.1).	No
Mon_072_093_010623	S47	Email	(i)The GHG Emissions for the Transmission Assets for Morecambe and Morgan Wind Farms have not been considered in the assessments. There are GHG Emissions associated with the Transmission Assets for Morecambe and Morgan Wind Farms which should be considered in determining the overall GHG Emissions footprint and carbon payback periods (see Morecambe PEIR Chapter 21, section 21.44).	GHG emissions are not bound by geographical boundaries. Consequently, cumulative effects due to other specific local development projects are not individually considered but are taken into account when considering the impact of the Mona Offshore Wind Project by defining the atmospheric mass of GHGs as a high sensitivity receptor. This is in accordance with IEMA guidance on Assessing Greenhouse Gas Emissions and Evaluating their Significance (IEMA, 2022). Consideration has been given to the indirect impact of route deviation within the greenhouse gas technical report (Volume 8, Annex 2.1: Technical greenhouse gas assessment) and has been considered in the operations and maintenance assessment (section 2.10.6). This draws on information presented within Volume 2, Chapter 7: Shipping and navigation of the	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
				Environmental Statement and the navigation risk assessment (Volume 6, Annex 7.1).	
Mon_072_094_010623	S47	Email	(ii)Indirect GHG Emissions have not been fully considered. Importantly, the increase in GHG Emissions resulting from the additional time spent by vessels (including Stena Line's vessels) in transiting the Wind Farm areas has not been considered. It appears that only GHG Emissions associated with the Wind Farms have been considered (i.e., GHG Emissions from vessels transporting materials to the Wind Farms) (see Morecambe PEIR Chapter 21, Table 21.9).	GHG emissions are not bound by geographical boundaries. Consequently, cumulative effects due to other specific local development projects are not individually considered but are taken into account when considering the impact of the Mona Offshore Wind Project by defining the atmospheric mass of GHGs as a high sensitivity receptor. This is in accordance with IEMA guidance on Assessing Greenhouse Gas Emissions and Evaluating their Significance (IEMA, 2022). Consideration has been given to the indirect impact of route deviation within the greenhouse gas technical report (Volume 8, Annex 2.1: Technical greenhouse gas assessment) and has been considered in the operations and maintenance assessment (section 2.10.6). This draws on information presented within Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement and the navigation risk assessment (Volume 6, Annex 7.1).	No
Mon_072_095_010623	S47	Email	(iii)There have been no cumulative assessments on the impact of the Mona, Morecambe and Morgan Offshore Wind Farms on direct/indirect GHG Emissions or the climate generally. This is particularly relevant where different phases of the Projects are predicted to produce different levels of GHG Emissions (i.e., as the construction phase of the Wind Farms are anticipated to produce the most direct GHG Emissions (see, for example, Morecambe PEIR Chapter 21, section 21.57)), this means that there may be a cumulative adverse impact for a significant period across the Projects before any cumulative net benefit is seen. It is impossible to make an assessment on this point given that insufficient information is available on the Morgan and Morecambe Transmission Assets (see Morgan PEIR Chapter 17, section 17.13.1.2).	GHG emissions are not bound by geographical boundaries. Consequently, cumulative effects due to other specific local development projects are not individually considered but are taken into account when considering the impact of the Mona Offshore Wind Project by defining the atmospheric mass of GHGs as a high sensitivity receptor. This is in accordance with IEMA guidance on Assessing Greenhouse Gas Emissions and Evaluating their Significance (IEMA, 2022). Consideration has been given to the indirect impact of route deviation within the greenhouse gas technical report (Volume 8, Annex 2.1: Technical greenhouse gas assessment) and has been considered in the operations and maintenance assessment (section 2.10.6). This draws on information presented within Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement and the navigation risk assessment (Volume 6, Annex 7.1).	No
Mon_072_096_010623	S47	Email	(c)Stena Line is committed to reducing its emissions both onshore and at sea and invests in clean energy technology. The increased time it will take for Stena Line to perform its routes (in normal and adverse weather conditions) as a result of the footprint of the Wind Farms will lead to increased GHG Emissions and will be counter-productive to Stena Line's current policies, and the purpose and intent of the Wind Farms.	Consideration has been given to the indirect impact of route deviation within the greenhouse gas technical report (Volume 8, Annex 2.1: Technical greenhouse gas assessment) and has been considered in the operations and maintenance assessment (section 2.10.6 of Volume 4, Chapter 2: Climate change of the Environmental Statement). This draws on information presented within Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement and the navigation risk assessment (Volume 6, Annex 7.1).	No
Mon_072_097_010623	S47	Email	(d)This increase in GHG Emissions is not anticipated to be insubstantial. Indeed, in considering increased shipping movements in respect of vessel movements related solely to the operation and maintenance of an example windfarm, the Morecombe PEIR suggests that these movements alone contribute 14.3% to total GHG emissions of the example windfarm (Morecambe PEIR Chapter 21, section 21.16).	Consideration has been given to the indirect impact of route deviation within the greenhouse gas technical report (Volume 8, Annex 2.1: Technical greenhouse gas assessment) and has been considered in the operations and maintenance assessment (section 2.10.6 of Volume 4, Chapter 2: Climate change of the Environmental Statement). This draws on information presented within Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement and the navigation risk assessment (Volume 6, Annex 7.1).	No
Mon_072_098_010623	S47	Email	(e)Inaccurate GHG Emissions statistics make it impossible to assess the efficacy of the Wind Farms and their net climate benefit.	Since PEIR, the GHG emission calculations have been updated. These revised calculations are provided within Volume 4, Chapter 2: Climate Change and its technical annex (Volume 8, Annex 2.1 Technical greenhouse gas assessment of the Environmental Statement).	No
Mon_162_022_040623	S47	Feedback form	Helps towards net zero goal	The Applicant notes your response.	No



D.25.28 Socio-ecomonics table of responses



Table D.25. 28: Socio-economics table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_026_004_070523	S47	Email	Any assessment you have undertaken on the likely impact on house prices in St Asaph as a result of this proposal?	The Environmental Impact Assessment process does not consider any potential impact on house prices. In the event that substantiated and tangible losses are incurred as a result of the project, they will be compensated for under the compensation code upon the implementation of the DCO.	No
Mon_039_001_250523	S47	Email	Proposal for sponsoring the Isle of Mann Netball team. within the project the changes to the maritime routes was classed within the overall scope of the project as an issue, but not significant. For the people of the Isle of Man, this will be seen as critical as soon as the reality hits that there will be an impact to their pocket/travel times will/could be longer. there is an opportunity to create visibility and a local brand awareness of the wider positive impacts this will bring and with this an aspect of Corporate and Social Responsibility. Isle of Man Netball are looking for sponsors/partners to support their growth from grass roots netball through to our performance squad, who are currently ranked 26th in the World. Isle of Man Netball are, with the exception of our Development Officer run fully by volunteers, and any funds generated go directly to supporting the growth of netball on the Island.	Noted - the project will be developing a community benefits fund and will be consulting with relevant communities in due course, including communities on the Isle of Man.	Yes
Mon_069_294_010623	S42	Email	Chapter 29 Socio-economics The TSC notes the specific reference to the Isle of Man as part of the Next Steps in the Socio Economic Assessment, and it welcomes the opportunity for continued engagement as part of this process. The TSC is keen to be involved as the commitments outlined by the applicant will be further developed, and to understand whether any of these commitments will alleviate any of the potential negative impacts that have been identified as being possible as part of the cumulative assessment for the shipping and navigation work.	Noted. Consultation with the TSC has continued throughout the preapplication process.	No
Mon_069_295_010623	S42	Email	The following commentary has been compiled by Department for Enterprise and Treasury, with review of draft IOMSPC comments.	The Applicant notes your response.	No
Mon_069_296_010623	S42	Email	General Observations- Of the three windfarms (Mona, Morgan, Morecambe), the Mona and Morgan arrays seem to represent the biggest economic risk to the Island. This is particularly the case when the multiple windfarm developments are looked at as a whole. This also includes existing windfarms (such as West of Duddon Sands) and the potential for developments within Isle of Man waters.	The Next Steps section indicated the need for further consideration of the potential socio-economic effects arising from the issues arising from potential impacts on ferry routes. The response to risk mitigation has primarily been addressed in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement. Where risks have not been fully mitigated, these have also been assessed in Volume 4, Chapter 3: Socio-economics of the Environmental Statement.	No
Mon_069_297_010623	S42	Email	•There would appear to be limited commentary in the consultation documents on the economic impacts on the Island. It is noted that the Morgan document PEIR 2.20 only covers the potential impacts of views of the windfarm from the Isle of Man, not the much more substantial economic effects on lifeline services.	The Next Steps section indicated the need for further consideration of the potential socio-economic effects arising from the issues arising from potential impacts on ferry routes. The response to risk mitigation has primarily been addressed in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement. Where risks have not been fully mitigated, these have also been assessed in Volume 4, Chapter 3: Socio-economics of the Environmental Statement.	Yes
Mon_069_298_010623	S42	Email	Economic Impacts –Lifeline Services- It is noted that SPCO have highlighted a number of apparently material inaccuracies in the consultation documents in relation to the frequency, importance, and expected impact of the developments on SPCO operations (and therefore the impact on the Island).	The Next Steps section indicated the need for further consideration of the potential socio-economic effects arising from the issues arising from potential impacts on ferry routes. The response to risk mitigation has primarily been addressed in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement. Where risks have not been fully mitigated, these have also been assessed in Volume 4, Chapter 3: Socio-economics of the Environmental Statement.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_069_299_010623	S42	Email	As a small Island nation, the Isle of Man is largely dependent on the import of goods. This includes time-critical deliveries such as food, medical supplies, chemicals, as well as construction supplies, durable goods, and many others.	The Next Steps section indicated the need for further consideration of the potential socio-economic effects arising from the issues arising from potential impacts on ferry routes. The response to risk mitigation has primarily been addressed in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement. Where risks have not been fully mitigated, these have also been assessed in Volume 4, Chapter 3: Socio-economics of the Environmental Statement.	Yes
Mon_069_300_010623	S42	Email	Any disruption of time-critical lifeline goods can have wider social impacts on the Island. The most obvious impact from a resident's perspective is in instances where there are multiple disrupted days' sailings, which can lead to shortages in shops and panic buying in some instances. This effect is likely materially different and proportionally much larger compared to a UK-Ireland service, for example.		Yes
Mon_069_301_010623	S42	Email	Wider impacts include general costs to businesses in terms of delayed imports/exports. The Island is at a competitive disadvantage in terms of transit times for goods and these issues would be exacerbated by an increase in delays/cancellations. This is particularly relevant in relation to seafood / agricultural export, manufacturing, and engineering sectors of the economy.	The Next Steps section indicated the need for further consideration of the potential socio-economic effects arising from the issues arising from potential impacts on ferry routes. The response to risk mitigation has primarily been addressed in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement. Where risks have not been fully mitigated, these have also been assessed in Volume 4, Chapter 3: Socio-economics of the Environmental Statement.	Yes
Mon_069_302_010623	S42	Email	There is only one other sea freight provider supplying the Island (Mezeron) and this operates at a substantially smaller scale than the SPCO. As a result and disruption to SPCO would be of proportionally much greater magnitude to the Isle of Man's economic and social wellbeing compared to routes where alternatives are available.	The Next Steps section indicated the need for further consideration of the potential socio-economic effects arising from the issues arising from potential impacts on ferry routes. The response to risk mitigation has primarily been addressed in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement. Where risks have not been fully mitigated, these have also been assessed in Volume 4, Chapter 3: Socio-economics of the Environmental Statement.	Yes
Mon_069_303_010623	S42	Email	·As noted by SPCO, the ferry service runs on a tight schedule with limited ability to make up time. For this reason, even fairly small increases in transit time would be expected to lead to a general increase in cancellations.	The Next Steps section indicated the need for further consideration of the potential socio-economic effects arising from the issues arising from potential impacts on ferry routes. The response to risk mitigation has primarily been addressed in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement. Where risks have not been fully mitigated, these have also been assessed in Volume 4, Chapter 3: Socio-economics of the Environmental Statement.	Yes
Mon_069_304_010623	S42	Email	Economic Impacts –Resident Travel- It is noted that the developments (especially in combination) will adversely affect journey times. This would have an economic cost to Island residents travelling via sea. In situations where longer delays or cancellations occur due to the impact of the developments, these would be exacerbated.	The Next Steps section indicated the need for further consideration of the potential socio-economic effects arising from the issues arising from potential impacts on ferry routes. The response to risk mitigation has primarily been addressed in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement. Where risks have not been fully mitigated, these have also been assessed in Volume 4, Chapter 3: Socio-economics of the Environmental Statement.	Yes
Mon_069_305_010623	S42	Email	Additional economic costs imposed on residents harms the Island's attractiveness as a place to live and work, though quantifying this effect is not possible.	The Next Steps section indicated the need for further consideration of the potential socio-economic effects arising from the issues arising from potential impacts on ferry routes. The response to risk mitigation has primarily been addressed in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement. Where risks have not been fully mitigated, these have also been assessed in Volume 4, Chapter 3: Socio-economics of the Environmental Statement.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_069_306_010623	S42	Email	Economic Impacts –Non-Resident Travel & Tourism ·It isnoted from SPCO's comments that the Liverpool services are particularly vulnerable to disruption in the Spring and Autumn due to weather and the need to avoid the developments.	The Next Steps section indicated the need for further consideration of the potential socio-economic effects arising from the issues arising from potential impacts on ferry routes. The response to risk mitigation has primarily been addressed in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement. Where risks have not been fully mitigated, these have also been assessed in Volume 4, Chapter 3: Socio-economics of the Environmental Statement.	Yes
Mon_069_307_010623	S42	Email	If cancellations occurred during 'peak' travel periods, this could lead to significant impact with a lack of capacity on alternative sailings; During super peak periods (i.e. TT / MGP), this could lead to passengers being delayed by extended periods (potentially days as other sailings are full); if visiting passengers travelling from the IoM were impacted, again during peak periods this could lead to a logistical challenge to accommodate people on Island, with accommodation providers potentially already being at capacity. There is precedent here when air and sea services have been disrupted and a civil contingency plan has been required to provide emergency overnight accommodation.	The Next Steps section indicated the need for further consideration of the potential socio-economic effects arising from the issues arising from potential impacts on ferry routes. The response to risk mitigation has primarily been addressed in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement. Where risks have not been fully mitigated, these have also been assessed in Volume 4, Chapter 3: Socio-economics of the Environmental Statement.	Yes
Mon_069_308_010623	S42	Email	The Consultation documents appear to speak in general terms with sailings averaged across the year, which does not reflect the very large peaks in traffic at particular points in the year, which would be severely impacted by any disruption. For example, while there are limited winter Liverpool sailings, the summer/TT sailings can be extremely busy.	The Next Steps section indicated the need for further consideration of the potential socio-economic effects arising from the issues arising from potential impacts on ferry routes. The response to risk mitigation has primarily been addressed in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement. Where risks have not been fully mitigated, these have also been assessed in Volume 4, Chapter 3: Socio-economics of the Environmental Statement.	Yes
Mon_069_309_010623	S42	Email	As with residents, additional economic costs (quantity unknown) would be borne by visitors to the Island, which would ultimately make the Island a less attractive place to visit to some degree.	The Next Steps section indicated the need for further consideration of the potential socio-economic effects arising from the issues arising from potential impacts on ferry routes. The response to risk mitigation has primarily been addressed in Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement. Where risks have not been fully mitigated, these have also been assessed in Volume 4, Chapter 3: Socio-economics of the Environmental Statement.	Yes
Mon_070_003_010623	S42	Email	The Council is therefore supportive of low carbon developments providing that they are sustainable in form and that local benefits including opportunities for local employment, skills enhancement and supply chain are maximised and realised.	The Applicant notes your response.	No
Mon_070_005_010623	S42	Email	. Maximising local Socio-economic benefits - Local Employment & Supply Chain Opportunities Chapter 29 together with Annex 29 of the PEIR provides an assessment of the potential impact of the Mona Offshore Wind Project during all of its phases on socioeconomics and community.	The Applicant notes your response.	No
Mon_070_006_010623	S42	Email	The Chapter confirms that the offshore wind sector is identified as a high priority industry within national, regional and local policies across the UK. This reflects the opportunities the sector provides for supporting economic development and growth and providing jobs and incomes for UK residents. The offshore wind sector is also identified as potentially offering employment opportunities for workers transitioning from other related industries, in particular activities that will require a significant degree of adaptation due to the continuation of efforts to decarbonise the economy.	The Applicant notes your response.	No
Mon_070_007_010623	S42	Email	Anglesey is identified within the socio economic and community tourism study area and included within the North Wales region within the assessment.	The Applicant notes your response.	No
Mon_070_008_010623	S42	Email	Chapter 29 confirms that the Mona offshore wind project has the potential to generate a total of 530 jobs and contribute £40 million towards the North Wales GVA in fabrications and installation activities. Furthermore, the project has the potential to generate a total	The Applicant notes your response.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			of 3,500 jobs and contribute £400 million towards the North Wales GVA in operation and maintenance activities. As such, the socio-economic receptor within the PEIR is assessed as high.		
Mon_070_009_010623	S42	Email	The impact on economic receptors across North Wales including employment, GVA, and supply chain demand during the construction and operations and maintenance phases are assessed to be significant in EIA terms (moderate beneficial).	The Applicant notes your response.	No
Mon_070_010_010623	S42	Email	The potential beneficial effects on employment opportunities for residents during the construction, and operations and maintenance phases are assessed to be not significant in EIA terms (minor beneficial).	The Applicant notes your response.	No
Mon_070_011_010623	S42	Email	The PEIR report acknowledges that the project will endeavour to support existing workforces within the supply chain as well as the creation of new roles where expansion of the sector is facilitated for local residents throughout all phases of the development.	The Applicant notes your response.	No
Mon_070_012_010623	S42	Email	For technical roles to be accessible to the economically inactive and unemployed individuals that want a job, this would very likely require a high degree of 'upskilling' and transitioning for workers. However, there are numerous indirect roles which support and facilitate technical roles, such as human resources, IT support, finance, and administration which are potentially more accessible to economically inactive and unemployed individuals that want a job.	The Applicant notes your response.	No
Mon_070_013_010623	S42	Email	The PEIR proposes that a Skills and Employment strategy will be prepared and submitted for approval under a requirement of the draft DCO.	The Outline Skills and Employment Plan (Document Reference J26) has been submitted with the Mona Offshore Wind Project application.	Yes
Mon_070_014_010623	S42	Email	The Council welcomes the approach as it is consistent with other major energy DCO proposals that have recently been examined. The Strategy should be comprehensive in terms of identifying - how opportunities for employment and skills will be made available during all stages of the project. The preparation of the Strategy should begin early and should include engagement with all the relevant stakeholders that can provide advice and input to the development of the Strategy.	The Outline Skills and Employment Plan (Document Reference J26) has been submitted with the Mona Offshore Wind Project application.	Yes
Mon_070_015_010623	S42	Email	The Council is eager to engage with you at an early stage to help influence and ensure that the strategy provides the level of detail and reassurance as to how skills and employment opportunities are to be secured for the local area.	The Outline Skills and Employment Plan (Document Reference J26) has been submitted with the Mona Offshore Wind Project application.	Yes
Mon_070_016_010623	S42	Email	In line with the vision of the Energy Island Programme and adoption of the proximity principle, the IACC strongly believes that a significant proportion of construction, operation and maintenance jobs should come from the region that is hosting the development. The IACC would encourage BP and EnBW to consider these opportunities now to enable local people and companies to train or ups Till to capitalise on these opportunities.	The Outline Skills and Employment Plan (Document Reference J26) has been submitted with the Mona Offshore Wind Project application.	Yes
Mon_070_017_010623	S42	Email	The Council would also like to see minimum local employment targets set as well as details as to the provision of apprenticeship and work placement opportunities that will be made available in order to ensure that local young people can capitalise on the opportunities during both construction and operation stage.	The Outline Skills and Employment Plan (Document Reference J26) has been submitted with the Mona Offshore Wind Project application.	Yes
Mon_070_018_010623	S42	Email	The preparation of the Strategy should begin early and should include engagement with all the relevant stakeholders that can provide advice and input to the development of the Strategy. The Council can advise further in relation to identifying the relevant stakeholders if this would prove useful to you.	The Outline Skills and Employment Plan (Document Reference J26) has been submitted with the Mona Offshore Wind Project application.	Yes
Mon_070_019_010623	S42	Email	The Council would encourage early and meaningful engagement with the Ambition North Wales, who will deliver the Growth Deal for North Wales, to maximise the potential economic value of the project for the region. The Council would also encourage early engagement with local education providers including primary schools, secondary schools, Coleg Llandrillo Menai and Bangor University to ensure that local	The Outline Skills and Employment Plan (Document Reference J26) has been submitted with the Mona Offshore Wind Project application.	Yes





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			young people are given the opportunity to train and work on these large infrastructure projects.		
Mon_070_020_010623	S42	Email	Similarly, local companies have the potential to be directly engaged in the development, fabrication, manufacturing, installation and maintenance process. However, local companies need to be made aware of the supply chain opportunities that will be made available during all stages of the project well in advance to allow them to plan accordingly and ensure that they can capitalise on the opportunities presented. In line with other major energy projects we would recommend that Meet the Buyer events are arranged so that early and direct engagement takes place.	The Outline Skills and Employment Plan (Document Reference J26) has been submitted with the Mona Offshore Wind Project application.	Yes
Mon_070_021_010623	S42	Email	Cumulative effects with other all Tier 1 and Tier 2 projects (including Awel y Môr and Mona offshore Wind Farms) have been assessed. The significance of cumulative construction phase employment and operations, maintenance phase employment and GVA impacts were assessed to be of moderate beneficial significant in Not Wales which is significant in EIA terms. The cumulative impact upon increase employment opportunities was assessed to be of minor beneficial significant which is not significant in EIA terms.	The Applicant notes your response.	Yes
Mon_070_022_010623	S42	Email	Given the numerous major energy projects that are proposed and consented within the North Wales region, the Council considers that there is potential for collaboration in order to ensure that socio-economic benefits for the region are maximised and aligned.	The Applicant notes your response. Further engagement will be undertaken with local and regional partners at the appropriate time to ensure that socio-economic benefits for the region are maximised and aligned in so far as possible	Yes
Mon_070_023_010623	S42	Email	The Council also confirms that it would welcome the opportunity to engage and advise on Supply chain Plan that will form a requirement of the Contract for Difference (CfD) application process.	The Applicant notes your response. Regional opportunities for engagement will be publicised at the appropriate time	Yes
Mon_070_024_010623	S42	Email	2. Community Fund: Offshore Wind Farms often provides a community fund as part of the development. Such funds involve an annual payment being made by the developer to those communities hosting the development. Funds are used to allow the communities surrounding a wind farm to benefit by investing in local initiatives or people.	The Applicant notes your response	Yes
Mon_070_025_010623	S42	Email	The Council has adopted a Community Benefit Contributions Strategy1 which provides developers with confirmation of the Councils aspirations in relation to securing community benefit from major energy developments. The strategy aims to maximise local benefits from such major developments to support the long-term sustainability, quality of life and wellbeing of the Island and its communities.	The Applicant notes your response	Yes
Mon_070_026_010623	S42	Email	The Council would welcome the opportunity to discuss the possibility of setting up a community fund as part of the Mona Offshore Wind Farm further with you to benefit the North Wales region and those communities that will host and be impacted by the development across all of the project phases.	The Applicant notes your response. Further engagement will be undertaken with local and regional partners at the appropriate time to ensure that socio-economic benefits for the region are maximised and aligned in so far as possible	Yes
Mon_070_027_010623	S42	Email	3. Potential use of Holyhead Port It is noted that the PEIR does not specify the final selection of ports, potential manufacturing and fabrication facilities, and delivery models required for the Morgan Offshore Wind Project. It is understood that BP and EnBW is currently exploring options in relation to ports, supporting infrastructure and labour markets in order to understand the potential capabilities, capacities and availability that exists.	A single port or multiple ports could be used to support the Mona Offshore Wind Project. The final port(s) have not been chosen at the time of application.	Yes
Mon_070_031_010623	S42	Email	A joint Freeport Bid between the Council and Stena Line has recently been successful. The Freeport will eliminate barriers to trade and provide easements that simplify how businesses can operate which brings significant new investment and additional funding streams to help develop new infrastructure.	The Applicant notes your response.	Yes





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Mon_070_032_010623	S42	Email	Anglesey is already a hub for the creation of sustainable energy, with our coastline pioneering some industry-leading initiatives which are driving the UK towards its net zero objectives. The Council is confident that the freeport status will support in creating a business environment that is appealing for potential investors and businesses within the energy sector.	The Applicant notes your response.	Yes
Mon_070_035_010623	S42	Email	4. Tourism and Recreation The Isle of Anglesey is a unique and popular destination for visitors and local people alike. The Island offers peace, tranquillity, adventure and experiences along with fantastic views and vistas, a distinct Area of Outstanding Natural Beauty covering practically the whole coastline of the Island, UNESCO World Geo Park, Beaumaris Castle – UNESCO sites and a multitude of other attractions.	The Applicant has noted your response. Volume 4, Chapter 3: Socio- economics of the Environmental Statement acknowledges the visual amenity of North Wales and that the area supports a wide range of recreation activities which draw in tourists.	Yes
Mon_070_036_010623	S42	Email	Anglesey's tourism industry currently attracts over 1.79million visitors annually with a total economic impact in excess of £362million. The sector also supports over 4000 jobs on the island and is now one of Anglesey's largest industries.	The Applicant has noted your response. A description of the visitor economy within North Wales is set out within the baseline section of Volume 4, Chapter 3: Socio-economics of the Environmental Statement.	Yes
Mon_070_037_010623	S42	Email	Tourism contributes to local prosperity and quality of life in Anglesey. The Island needs to manage and develop tourism because this is where it has a natural comparative advantage.	The Applicant has noted your response. Prosperity and quality of life is addressed in the baseline economic and social sections of Volume 4. Chapter 3: Socio-economics of the Environmental Statement.	Yes
Mon_072_099_010623	S47	Email	Socio-economics (a)Stena Line reserves the right to comment further in respect to the Morgan and Morecambe Transmission Assets before it is able to comment substantively on any socio-economic impacts that may impact Stena Line's operations.	The Applicant notes your response.	Yes
Mon_079_001_040623	S42	Email	There are numerous issues but the key ones are (1) the visual impact and other impacts of the proposed Mona substation due to its large scale; (2) the cumulative effect of the proposed Mona substation when considered with other existing and proposed schemes; (3) the proportionality of their impacts all falling on one community; (4) the role of National Grid in determining the scale on which the community will be affected; and (5) the complete absence of any strategic or coordinated approach to the planning of large-scale projects making important contributions to the future of renewables and net zero, but having critical impacts on the small community most impacted by them.	The visual impact of the onshore substation is assessed in Volume 3, Chapter 6: Landscape and Visual Resources (Document Reference F3.6). Cumulative effects of the onshore substation with other existing and proposed schemes in the vicinity are considered within all chapters within Volume 3 (Document Reference: F3). The role of National Grid in the selection of the point of interconnection is detailed in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference F1.4).	No
Mon_079_002_040623	S42	Email	(1) The very large scale of the proposed substation is entirely incompatible with and insensitive to the rural landscape of Cefn Meiriadog in which it is proposed to site it. It and its associated infrastructure will have extremely deleterious effects on that landscape, and therefore on our rural community living within it. The visual impact will clearly be extreme, and there will be large and unacceptable impacts on agricultural land and farming businesses, road usage, and other aspects of life in the community. The essential nature of the community will be changed irreversibly.	The effects on landscape character, visual effects and cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document reference J3). As stated in Volume 4, Chapter 4: Human health assessment of the Environmental Statement: "Visual impacts of onshore infrastructure, including the onshore substations, are not expected to be of a scale that could affect population health outcomes'.	Yes
Mon_079_003_040623	S42	Email	(2) The cumulative impact of the Mona proposal taken with other existing and proposed developments is, by extension, even more unacceptable. Cefn Meiriadog has recently seen unprecedented development, and this continues to accelerate alarmingly. The community was once overwhelmingly, and remains predominantly, rural in character, which is why its residents have chosen to live here. With three existing large substations and five large-scale projects currently in development (Awel y Môr, Mona, National Grid substation extension, Mares Connect substation, St Asaph Solar Farm), the cumulative effect is necessarily seriously detrimental, if not completely destructive, to that essentially rural character. Existing substations have already taken up any areas that could be considered as relatively (but by no means completely) unobtrusive through topography and tree cover. The ones currently in development, including Mona, are	The cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document reference J3). The proposed mitigation is shown on the Illustrative Landscape and Ecology Strategy Plan (Figure A.6.4). An outline LEMP has been included in the application (Document reference J22). As stated in Volume 4, Chapter 4: Human health assessment of the Environmental Statement: "Visual impacts of	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			therefore planned to be in highly visible locations. The numerous large pylons and gantries accompanying them also have a substantial and irreversible impact in themselves.	onshore infrastructure, including the onshore substations, are not expected to be of a scale that could affect population health outcomes'.	
Mon_080_001_040623	S47	Email	Thank you for the opportunity to respond to the BP/EnBw Morgan and Mona windfarms consultation which ends today. Our response welcomes the development proposals, their preferred locations, landfall point, development methods, scale and commitments to invest in recruiting the required construction and operations and maintenance skills in and around the still to be selected preferred port locations from the shortlist of England's ports of Barrow, Heysham and Liverpool /Birkenhead and from Holyhead and Mostyn in Wales. We have reviewed the documentation in the light of national and regional policy contexts including the Net Zero North West Economic Investment Prospectus and the Cumbria Clean energy strategy (see 2208-CumbriaCleanEnergyStrategy.pdf (thecumbrialep.co.uk)). The Clean energy strategy focus is on stimulating new developments in: • offshore wind, • hydrogen, • Carbon capture and storage • nuclear power generation both for electricity generation and steam raising for use in in nuclear powered submarines • improving adoption of lower carbon technology and new energy efficiency measures Its ambition is for "Cumbria ports will provide the O&M hub of a growing regional offshore wind capacity making a significant contribution to UK clean energy requirements. This is further supported by growing Cumbria's specialist manufacturing capability and a world-wide reputation for offshore operations skills development." It adds, "there isa significant role that can be played by Barrow and Workington to both support construction and importantly to provide the maintenance and operations bases."		No
Mon_080_002_040623	S47	Email	The Furness area has engaged with the offshore wind industry since 2002 and enabled four phases of development in 2005/2006, 2010/2012, 2014 and 2018. The planned build of the Morgan and Mona projects over 4 "annual build seasons" between 2026 and 2030 is a fifth opportunity to further grow this relatively new sector, diversify the local economy and enable BP/EnBw to capitalise on the skills infrastructure and support services within the Furness peninsula and NW England.	Whilst the project provides opportunities for good quality employment, which are noted as beneficial for health, these are not on a scale with the potential for significant population level effects. Consideration has been given to how benefits, including for local and vulnerable groups, could be enhanced. An Outline Skills and Employment Plan (Document Reference J24) has been produced. The potential for tailoring opportunities to local and vulnerable groups will be considered as that plan is developed	
Mon_080_003_040623	S47	Email	Exiting offshore wind operations within southwest Cumbria support around 350 jobs each year directly with wind farm operators, original equipment manufacturers and with specialist contractors and up to 17 crew change vessels out of the port of Barrow. SOV support ships also use the port as a base. This skills base has built from nothing prior to 2005 through people transferring skills from existing locally based industry, people relocating to the area, through growth and graduation of apprentice skills learning and through weekly resident contractors supplementing that workforce. It is anticipated that trend would continue to underpin availability of the skills to support construction operation and maintenance of the Morgan Mona and Morecambe windfarm projects both during the 2026-2-30 build period and in the subsequent 35 year operating life of the turbines and any future repowering. The area has a track record as one of the fastest growing coastal regions of the UK, offering good wages and career prospects, since 2003 the shipyard workforce has	The Applicant notes your response	Yes





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			grown from 3,000 to nearly 10,500 and a further 6000 to 7000 are planned. Offshore wind has grown from 10 jobs in 2006 to the 350 now. These people and their organisations have accumulated 17-18 years operating experience in the E. Irish Sea, that will be 20+ years by the time the BP/EnBw build starts. Additional families will create a larger pool of labour to call upon by the BP/Enbw team as it delivers its projects.		
			Furness College delivers offshore windfarm technician apprenticeship training alongside specialist engineering apprentice training. Gen 2 also has a local presence. University of Cumbria is building a multimillion-pound new campus at Barrow which will focus on delivering degree courses in its institute of engineering, computing and manufacturing under professor Jill Stewart.		
			Each year around 1,000 secondary school students go on to take apprenticeships or further education courses. Barrow has one of the highest apprenticeship take up rates in England.		
Mon_080_004_040623	S47	Email	Each year Furness Education and Skills Partnership delivers Build my skills engagement between businesses and schools throughout Furness supplementing this with Stem Fest days designed to interest young people in careers in offshore wind and other energy transition sectors.	The Applicant notes your response	Yes
			One of the locally based wind farm operators has also started using its facilities at Barrow to train technicians from overseas working alongside the technicians embedded locally.		
			Accommodating skilled people is identified as a requirement by BP /EnBw. In Furness we have a mature Accommodation Hub advisory service supporting companies and individuals with finding accommodation it links networks of providers with companies whose staff may need to identify housing apartments hotels or guest house accommodation, since 2015 it has been supporting a wide range of personnel and businesses as part of our effort to grow business tourism and attract investment by internationally branded hotels and by developers offering new accommodation.		
			Current work is focusing on a housing growth strategy		
Mon_080_005_040623	S47	Email	Infrastructure Associated British Ports owners of the port of Barrow has recently met with BP EnBw to brief them on port capacity potential and possible synergies with existing port activity able to assist elements of offshore construction and future operations and maintenance using sov vessels and helicopters for the Sandscale heliport in north Barrow or Walney airport. THE heliport is a unique asset that could work alongside for example Blackpool airport facilities.	The Applicant notes your response	Yes
			Northern rail now run six coach trains on its Barrow Manchester via Lancaster and Preston services guaranteeing additional capacity, National Highways is continuing to invest in improving the A590 link to the M6.		
			At Sowerby Woods Barrow, Park Road barrow and at Ulverston on part of GSK's land new business sites are being provided and there is the 16,000ft2 Waterfront Gateway Managed office space at the entrance to the port which suppliers could make use of.		
Mon_080_006_040623	S47	Email	Taking advantage of Supply Chain strengths	The Applicant notes your response	Yes
			Over 160 supply chain companies have been involved in supporting offshore windfarm construction and subsequent operations and maintenance activity through Barrow since 2005/6.there is scope to access this range of expertise and established suppliers from		





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			outside the northwest who already support the existing offshore wind operations. Local business support agencies continue to engage and introduce new suppliers through energy forums involving established operators, the most recent was on 26 may 2023		
			Barrow's offshore windfarms are now out of warranty and the operators are benefitting from new ways of operating efficiently which might create learning opportunities for BP/EnBw		
			Operation and maintenance expertise is embedded in a workforce that is generally required to reside within a 30 minute drive time of the bases at the port of Barrow		
			Local quarries have provided stone for scour protection export by sea to Irish sea windfarms.		
Mon_080_007_040623	S47	Email	Commentary on the consultation documentation Barrow is delivering a national endeavour to provide the royal navy with new submarine fleets between now and the 2050s, it will be important to consult BAE systems maritime and Royal Navy to ensure that future submarine movements out of Barrow can occur safely.	The Applicant notes your response	Yes
			With Spirit Energy intending to develop CCSYU technology and Hydrogen generation BP and EnBw may wish to explore potential for energy transition related collaboration with the company and with D carbon X on its Bains gas field reuse proposal.		
			We hope these observations are helpful. Best regards		
Mon_080_008_040623	S47	Email	APPENDIX A FIVE PRIORITIES ACTIONS IN CUMBRIA CLEAN ENERGY STRATEGY: OFFSHORE WIND 1. Extend the life and use of existing developments and identify plans for de or recommissioning. 2. Maximise Cumbria manufacturing opportunities from the UK wide and export expansion of offshore wind. 3. Continue to work with Port Operators to establish Cumbrian ports as the O&M Hub for Round 4 Lease developments. 4. Lobby Crown Estates for future Round 5 Lease and co-production/off-grid solutions. 5. Maximise synergies with the nuclear sector with expertise in management of assets in challenging environments (e.g., robotics/remote inspection/data analysis/ safety systems)		Yes
Mon_080_009_040623	S47	Email	APPENDIX B KLOSINSKI ECONOMIC DEVELOPMENT LTD Klosinski Economic Development Ltd is an economic development consultancy (former May 2015) that helps companies develop supply chain opportunities, enables public sector organisations realise masterplans, delivery of business support programmes and projects. It works with charitable organisations such as Furness Education and Skills Partnership involved in furthering schools and business links with primary and secondary schools to develop students interest in stem based careers and acts as secretariat for a national organisation that champions skills and supply chains growth in the defence naval industry. Its principal consultant is also a Board member of Furness Education and Skills Partnership (FESP), works closely with Furness College, and is a member of the Northern England advisory Board of the UK and Scottish Government funded Global Underwater Hub (Global Underwater Hub - Championing the UK's underwater sectors) Prior to 2020 he led the Furness Economic Development Forum chaired by the area's Member of Parliament. Prior to 2015 was Industrial development Manager of Furness Enterprise Development Agency helping facilitate new inward investment and organic	The Applicant notes your response	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			growth of companies including past offshore gas landfall treatment and attraction of offshore wind support base developments.		
Mon_085_003_040623	S47	Email	3. Community Impact. Scale and location of project will impact negatively on rural character of Cefn Meiriadog, changing the nature and character of the community irreversibly.	The Applicant is a responsible developer committed to operating as part of the North Wales community for many decades to come. Throughout this period they are committed to working in partnership with the local community to ensure any impacts created by the Project are identified and appropriately mitigated.	Yes
				The effects on landscape character, visual effects and cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement. The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document Reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline LEMP (Document J22).	
Mon_108_001_010623	S44	Feedback form	Q3 (Do you have comments on how the project could support and work with local, regional and national communities and the economy) - Yes: Have an open meeting with residents, councils, county councils, environmental organisations etc. Compensation to property owners	Throughout the pre-application stage the Applicant has hosted a number of in-person and online events, attended by both local residents and statutory consultees. The Applicant is committed to being open, constructive, collaborative and solutions-focused and believes it is delivering the Mona Offshore Wind Project in a way that demonstrates these behaviours. They also recognise the importance of continuing to work with the communities in which it is operating, and this ongoing engagement via various methods, will continue throughout the construction period and into operation. With regards to compensation, should a mitigated and substantiated claim be brought where losses have been incurred as a direct result of	No
				the project, such claims will be reviewed according to the compensation code.	
Mon_123_002_100723	S42	Email	The development could also be positive in providing employment in the green sector. We also appreciate the need for wide consultation, to minimize the impact of the development on the marine/ terrestrial environments and on local communities.	The Applicant notes your response and recommends reviewing the Socio-Economics chapter (Document Reference F4.3) for information on employment, and the Chapters within Volume 2, 3 and 4 of the Environmental Statement for information on the applicant's proposals to minimise and mitigate against any potential effects on the marine and terrestrial environments.	No
Mon_123_005_100723	S42	Email	We would also welcome the opportunity to bid for community funding from your project as Llanfairfechan has so far missed out as we are out of the catchment area for the Gwynt y Mor Community Funding. We have many projects that would benefit from a boost in funding, and I have added information websites about our town here: Home Llanfairfechan Town Council Discover Llanfairfechan We would be grateful if we could be kept in the loop regarding the project and any funding for community projects which may become available.	The applicant notes your response.	No
Mon_127_002_230423	S44	Feedback form	Offering training apprenticeships to members of the local North Wales community as part of the project would leave a positive legacy.	An Outline Skills and Employment Plan has been included in the DCO application (Document Reference J24).	No
			Working in collaboration with local schools, colleges and universities, offering placements, training etc would be beneficial.		
			Ensuring that once the project is completed that the members of the local community		





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			will be trained and skilled so they can be part of the maintenance crew.		
			Support services should be recruited form within the local area.		
Mon_131_002_280423	S47	Feedback form	There are no benefits to the local community and no reduction in costs.	The benefits of the project are set out in each of the Environmental Statement Chapters, and the applicant would like to draw the consultee's attention specifically to Volume 4, Chapter 3 Socio-economic of the Environmental Statement (Document Reference F4.3)	No
Mon_133_002_050523	S47	Feedback form	Will bring very little to the UK economy	The Applicant notes your response	Yes
Mon_149_002_260523	S47	Feedback form	It would be ideal if the project could support the local community and economy with a substantial monetary grant to residents and local council. Training the local residents to help with construction on site would be ideal, in an area of local deprivation.	An Outline Skills and Employment Plan has been included in the DCO application. (Document Reference J26). This document sets out our proposals for ensuring the Mona Offshore Wind Project creates demonstrable benefits for the community. Given the size and scale of the project, we recognise this plan will need to take a holistic approach which delivers economic benefits for the region over the short, medium and long term. We also recognise that North Wales, and Conwy specifically, has a long history of supporting offshore wind development and that there are opportunities to plug into existing skills and experience.	No
Mon_151_001_270523	S47	Feedback	This is part of a large project within the Irish Sea that has will produce good benefits for the UK but, as it stands, appears to offer no benefit to the Isle of Man and will adversely impact the island significantly due to disruption to shipping. The effects will be significant increased costs and reduced reliability with higher costs in the economy, disruption for residents and reduced tourism, with no benefit from the energy generated. Shipping to Northern Ireland may also be adversely impacted.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (Volume 6, Annex 7.1) and Environmental Statement Chapter (Volume 2, Chapter 7) submitted as part of the Application. Potential impacts to tourism are assessed in Volume 4, Chapter 3 Socioeconomics of the Environmental Statement.	Yes
Mon_151_002_270523	S47	Feedback form	Benefits for the UK but none for the Isle of Man. The island will suffer higher economic costs and damage to tourism	Potential impacts to tourism and the economy more widely are assessed in Volume 4, Chapter 3 Socio-economics of the Environmental Statement.	No
Mon_153_001_280523	S47	Feedback form	The placement of this wind farm has serious implications for the trade of the Isle of Man - the ferry is already one of the most expensive for freight and if the Mona and Morgan wind farms get the go ahead will devastate the trade to the Island. The whole purpose of green energy is to improve the planet not impact on a Countries ability to trade and destroy their trade route whilst increasing their amount of carbon utilization.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the	Yes





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				developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (Volume 6, Annex 7.1) and Environmental Statement Chapter (Volume 2, Chapter 7) submitted as part of the Application.	
Mon_156_003_010623	S47	Feedback form	It will destroy Manx's economy and food channel. So I honestly don't see why this project is even on the table.	Impacts to on the economy are assessed in Volume 4, Chapter 3 of the Environmental Statement.	Yes
				The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (Volume 6, Annex 7.1) and Environmental Statement Chapter (Volume 2, Chapter 7) submitted as part of the Application.	
Mon_156_005_010623	S47	Feedback form	The whole project MUST be abandoned because it is damaging to the Manx people, industries, and economy, plus ecology and marine life.	Impacts to marine ecology receptors and human receptors (e.g. shipping and navigation, commercial fisheries and socio-economics including the interaction with lifeline ferry services) have been fully assessed for all phases of the project, based on a maximum design scenario approach. Designated sites within the Isle of Man territorial waters, and their associated habitats and species, have been considered and documented in the assessment process. Seascape and visual impacts and impacts on designated heritage assets from the offshore infrastructure have also been considered. The assessment has engaged with stakeholders from the Isle of Man to ensure all relevant and available data has been included and is therefore based upon the best evidence to underpin the assessment of impacts. Most assessments have determined that there will be no significant effect from the Mona Offshore Wind Project. Where a significant effect has been identified, the Applicant has set out appropriate mitigation within the application. Detailed mitigation will be determined post-consent once the project parameters are fully refined and understood. Key stakeholders, including those on the Isle of Man, will be consulted to ensure the mitigation approach is suitable.	Yes
Mon_158_002_020623	S44	Feedback form	Cefn Meiriadog now has the St Asaph Business Park as its neighbour, but this should not result in BP using this as an excuse to industrialise a rural community any further than it already has been. Resultant ill effects on the community health and wellbeing will be for certain. Farming life will have unacceptable restrictions, resulting in farming	(IEMA 2022) in providing a population health assessment. The	No





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			businesses suffering losses and mental ill-health. It may likely be irrevocable, after generations of same family farming!	methodology set out in guidance) does not reach conclusions on individual level health outcomes. The Environmental Statement Human Health chapter has had regard to local sensitivities, including in relation to age, health status and income, across the scope of issues covered by the assessment. The health assessment scope includes the public health implications of construction effects. The Land Use chapter of the Environmental Statement has assessed the impacts on agriculture.	
Mon_158_012_020623	S44	Feedback form	I do have a viewpoint though - stop the Community Benefit Funds. These are merely a sweetener tempting (and designed to tempt) people who just see the short term £ signs and not the bigger picture. If the projects were truly looking to care for communities and those directly negatively affected, CBF money would not need to exist.	The Applicant notes your response.	No
Mon_161_002_020623	S47	Feedback form	The Project will move more jobs away from the area and collapse the local communities	The Applicant notes your response. However, it believes the generation of renewable energy brings a range of benefits to its host communities such as job creation, supply chain opportunities, skills growth and the chance to contribute to the generation of renewable energy.	No
Mon_162_002_040623	S47	Feedback form	Any disruption/construction work is likely to be temporary, Project could bring employment into local area. Existing infrastructure for Wylfa A and B could be used.	The Applicant notes your response.	No
Mon_162_021_040623	S47	Feedback form	Positive impact on local economy	Thank you for your response. The Applicant believes there will be significant levels of opportunities created for businesses operating in - and supplying goods and services to - the offshore wind industry in North Wales. Local jobs will also be created by the Project.	No
Mon_164_007_040623	S44	Feedback form	The current plan will be hugely disruptive to farms, tourism, and all forms of local commerce.	The Applicant believes there will be significant levels of opportunities created for businesses operating in - and supplying goods and services to - the offshore wind industry in North Wales. Local jobs will also be created by the Project. Impacts of industries such as agriculture and tourism have been identified and measured, with appropriate mitigation being proposed within our Environmental Statement (see Volume 3, Chapter 7 Land use and recreation and Volume 4, Chapter 3 Socioeconomics).	No
Mon_166_003_070623	S47	Feedback form	Employ us local people + creating more jobs, are essential	The Applicant believes the generation of renewable energy brings a range of benefits to its host communities such as job creation, supply chain opportunities, skills growth. An Outline Skills and Employment Plan has been included in the DCO application (Document Reference J24).	No
Mon_174_002_230423	S47	Consult Online	Furthermore, what commercial benefits will this bring to UK residents	The Applicant believes the generation of renewable energy brings a range of benefits to its host communities - as well as regionally and nationally - such as job creation, supply chain opportunities, skills growth and the chance to contribute to the generation of renewable energy. An assessment of the impact to the economy is included in Volume 4, Chapter 3 of the Environmental Statement.	No
Mon_180_001_280423	S47	Consult Online	Well, nice you UK wants "green" energy. But gets the Isle of Man the energy? Main practical objections are the ferry connections. These will be in jeopardy. This will increase the costs of crossing permanently, so the inflation will rise even more for the Isle. Do we get compensation? Remember 70% of the food price is energy price.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in unacceptable risks to navigation safety and significant effects on lifeline ferry services. These impacts were identified both alone and cumulatively with other offshore wind projects within the Irish Sea. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the	Yes





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				developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (Volume 6, Annex 7.1) and Environmental Statement Chapter (Volume 2, Chapter 7) submitted as part of the Application.	
Mon_189_004_020623	S47	Consult Online	It will devalue our house prices and ruin the beautiful city we have all worked hard to build. It is a disgrace to even consider building it in our beautiful city. We will have NO benefit of you building it here just the destruction of more green belt land. If it isn't houses, we are having to oppose its now substations?? Call yourself environmentally friendly energy sources yet you are willing to destroy that amount of woodland??? You should closer to the coast.	In the event that substantiated and tangible losses are incurred as a result of the project, they will be compensated for under the compensation code upon the implementation of the DCO.	No
Mon_190_002_020623	S47	Email	this is a well-established site, and we mainly serve the elderly on our site for a quiet and peaceful retreat some also have illnesses and love the rural area	The Applicant notes your response.	No
Mon_197_026_190623	S44	FREEPOST	Community benefits, your scheme and others have advised of this, residents of Glascoed Road, have seen no benefits of these from past schemes.	The Applicant notes your response & will engage with the local community as the community benefits fund is being developed	No
Mon_201_003_190623	S44	Email	• I note that the land connectivity with the wind turbines is further East from Llandudno, and any community grants seem to be focused around the land connectivity, we would argue that if this scheme goes ahead, there should be grants for both the community and businesses in Llandudno, as there visual impact and business are likely to be affected	The applicant notes your response. The Applicant will engage with relevant local communities as the community benefits scheme is being designed	No

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D.25.29 Human health assessment table of responses



Table D.25. 29: Human health assessment table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_072_100_010623	S47	Email	Human Health Assessment (a)Stena Line notes that there is insufficient information in respect of the cumulative impact of the Mona, Morecambe and Morgan Offshore Wind Farms on Human Health deriving from navigational risks or otherwise, to be able to make a cumulative effects assessment ("CEA") (see Mona PEIR Chapter 30at section 30.11.1.10, Morecambe PEIR Chapter 19 at section 19.190). Although, it is queried why Morgan Offshore Wind Project Generation Assets has not included a similar reservation (see Morgan PEIR Chapter 19 at section 19.10).	A full CEA is presented in Volume 4, Chapter 4: Human health assessment of the Environmental Statement (Document Reference: F4.4).	No
Mon_072_101_010623	S47	Email	(b) It is understood that the CEA for the Wind Farms will be contained within the Environmental Statement health chapter submitted in support of the application for Development Consent (see Mona PEIR Chapter 30, section 30.11.1.10, Morecombe PEIR Chapter 19 section 19.193).	A full CEA is presented in Volume 4, Chapter 4: Human health assessment of the Environmental Statement (Document Reference: F4.4).	No
Mon_072_102_010623	S47	Email	(c) It is therefore not possible to fully comment or appreciate the collective impact of the Wind Farms at this stage, save that it is noted that the potential cumulative impact: (i) on commercial operators (including strategic routes and lifeline ferries) is considered to be "moderate adverse"; (ii) on adverse weather routeing is considered to be "major adverse"; (iii) to vessel collision risk is considered to be "major adverse"; and (iv) collision risks to vessels is considered to be "moderate adverse" (see Morgan PEIR Chapter 19,section 19.10.2.1, Mona PEIR Chapter 30,section 10.11.2.1).	A full CEA is presented in Volume 4, Chapter 4: Human health assessment of the Environmental Statement (Document Reference: F4.4), the findings of which have been consulted on will statutory consultees and relevant stakeholders, including Stena Line.	No
Mon_072_107_010623	S47	Email	(d)The Mona PEIR Submissions also suggest that there may be adverse cumulative impact to essential recognised sea lanes and access to ports and harbours (see Mona PEIR Chapter 30, section 10.11.2.1), which is not reflected in the corresponding PEIR Submissions made in respect of the Mona and Morecambe Wind Farms.	The NRA and Shipping and Navigation Chapter of the PEIR identified that the Mona Offshore Wind Project would result in cumulative impacts to sea lanes and access to ports and harbours. Following the PEIR and S42 responses, the Mona Offshore Wind Project has committed to modifications of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (Volume 6, Annex 7.1 of the Environmental Statement, Document Reference F6.71)) and Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement (Document reference F2.7) submitted as part of the Application. The Applicant refrains from commenting on the content of the Morgan Generation Assets or Morecambe Generation Assets PEIRs.	
Mon_072_108_010623	S47	Email	(e) The impact of the above is stated to have the potential to be "influential in widening health inequalities" as a result of "ongoing and more frequent disruption in access to goods and services and increased shipping risk" (Mona PEIR Chapter 30, section 30.11.2.8). It is thought to be of moderate adverse significance if unmitigated (se Mona PEIR Chapter 30, section 30.11.2.6).	As per the assessment presented in Volume 4, Chapter 4: Human health assessment of the Environmental Statement, the reduction in the Mona Array Area has reduced the cumulative effect from that reported in the PEIR.	Yes
Mon_072_109_010623	S47	Email	(f) There is the potential for adverse effects associated with shipping's access to human health, when Mona, Morecambe and Morgan are considered together. The Morecombe PEIR Chapter 19, section 19.193 states: "Discussions between the projects developers is ongoing to develop measures to avoid navigational impacts that could constitute a likely significant effect for public health" (emphasis added).	As per the assessment presented in Volume 4, Chapter 4: Human health assessment of the Environmental Statement, the reduction in the Mona Array Area has reduced the cumulative effect from that reported in the PEIR.	Yes
Mon_072_110_010623	S47	Email	(g) As stated above, Stena Line's concerns are that the shipping risks are not going to be properly mitigated effectively. To emphasise, Stena Line provides a lifeline ferry	As per the assessment presented in Volume 4, Chapter 4: Human health assessment of the Environmental Statement, the reduction in the Mona	Yes



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			service to several communities. In particular, Stena Line's concerns in respect of overcrowded shipping lanes and the associated increased collision and allision risks, which will in turn affect human health, are restated.	Array Area has reduced the cumulative effect from that reported in the PEIR. Ferry routes will be able to be adequately maintained.	
Mon_072_111_010623	S47	Email	(h) Stena Line requires further details to be provided as to the mitigation steps being taken to reduce the impact of human health, particularly where there is an increased risk of fatalities and injuries during navigation, to make an informed opinion and position. Noting that section 12.8.4.19 of the Mona PEIR, Chapter 12, refers to "possible minor injuries" arising from vessel heading options being constrained during adverse weather, the PEIR clearly underestimates the sheer number of passengers and crew carried by Stena Line. As an example, there are up to 1,000 persons carried onboard the E-Flexer class vessels. The prospect of minor injuries across such a large passenger and crew base is significant.	Noted. Changes to the Mona Array Area will adequately maintain commercial ferry routes during normal and adverse weather conditions and avoid any adverse significant effects.	Yes
Mon_076_002_030623	S44	Email	They wish to raise the following matters: 1. Utilities and flooding Work areas 10D and 20 will cut off their water supply which runs through that field from the top road to their house. The field slopes down towards their house and in the past has brought down surface water which has caused flooding. They have paid for work to be undertaken which has now remedied the flooding, however they are concerned that any construction work in the field will cause disruption and potentially cause the flooding to return. 2. Noise and pollution All three routes are extremely close to their home. Given their close proximity, they are concerned about continuous noise and pollution from plant and vehicles that will emanate from the construction site over a period of time and the adverse impact this will have upon their health and well being. 3. Health They are elderly and this is their retirement home. During the last 9 months they have both suffered with significant ill health and both been hospitalised. Peace and quiet enjoyment of their home is very important for their health. 4. Financial They purchased the land and two stone barns in 1989. They spent the next 12 years developing the site at their own cost which involved considerable hard work. They moved to live there in 2001. Their home is their principle investment and the prospect of this work to the adjacent land will almost certainly have devalued their home already. This will have a significant impact upon their finances. Should the need arise to sell the property, the construction work will have to be disclosed to any potential buyer and will act as a deterrent to any future sale.	The Applicant is working with all utility suppliers to determine the precise location of buried utilities, and the project does not intend to interrupt or divert the delivery of any current utility service. Volume 4, Chapter 4: Human Health of the Environmental Statement (Document Reference: F4.4) follows guidance (IEMA 2022) in providing a population health assessment. The assessment has regard to vulnerable groups, and in this case assigns them the highest level of sensitivity, but (in line with the assessment methodology set out in guidance) does not reach conclusions on individual level health outcomes. The Environmental Statement Human Health chapter has had regard to local sensitivities, including in relation to age, health status and income, across the scope of issues covered by the assessment. The health assessment scope includes the public health implications of construction effects. Measures to minimise the impacts of construction are set out in the Outline CoCP (Document Reference 26) and its appendices. This includes measures for managing flood risk, dust and noise. A detailed CoCP will be agreed with the relevant stakeholder before construction commences. In the event that substantiated and tangible losses are incurred as a result of the project, they will be compensated for under the compensation code upon the implementation of the DCO.	
Mon_076_003_030623	S44	Email	Please can you confirm whether there will be recompense for the following during the construction work: (a) Disruption caused to quality of life and quiet enjoyment. (b) III health (c) Financial loss I look forward to hearing from you. Kind regards,	In the event that substantiated and tangible losses are incurred as a result of the project, they will be compensated for under the compensation code upon the implementation of the DCO.	No
Mon_079_001_040623	S42	Email	There are numerous issues but the key ones are (1) the visual impact and other impacts of the proposed Mona substation due to its large scale; (2) the cumulative effect of the proposed Mona substation when considered with other existing and proposed schemes; (3) the proportionality of their impacts all falling on one community; (4) the role of National Grid in determining the scale on which the community will be affected; and (5) the complete absence of any strategic or coordinated approach to the planning of large-	Chapter 6: Landscape and Visual Resources of the Environmental	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			scale projects making important contributions to the future of renewables and net zero, but having critical impacts on the small community most impacted by them.	consideration of alternatives of the Environmental Statement (Document Reference: F1.4).	
Mon_079_002_040623	S42	Email	(1) The very large scale of the proposed substation is entirely incompatible with and insensitive to the rural landscape of Cefn Meiriadog in which it is proposed to site it. It and its associated infrastructure will have extremely deleterious effects on that landscape, and therefore on our rural community living within it. The visual impact will clearly be extreme, and there will be large and unacceptable impacts on agricultural land and farming businesses, road usage, and other aspects of life in the community. The essential nature of the community will be changed irreversibly.	The effects on landscape character, visual effects and cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement (Document Reference F3.6). The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document Reference J3). As stated in Volume 4, Chapter 4: Human health assessment of the Environmental Statement (Document Reference: F4.4): 'Visual impacts of onshore infrastructure, including the onshore substations, are not expected to be of a scale that could affect population health outcomes'.	Yes
Mon_079_003_040623	S42	Email	(2) The cumulative impact of the Mona proposal taken with other existing and proposed developments is, by extension, even more unacceptable. Cefn Meiriadog has recently seen unprecedented development, and this continues to accelerate alarmingly. The community was once overwhelmingly, and remains predominantly, rural in character, which is why its residents have chosen to live here. With three existing large substations and five large-scale projects currently in development (Awel y Môr, Mona, National Grid substation extension, MaresConnect substation, St Asaph Solar Farm), the cumulative effect is necessarily seriously detrimental, if not completely destructive, to that essentially rural character. Existing substations have already taken up any areas that could be considered as relatively (but by no means completely) unobtrusive through topography and tree cover. The ones currently in development, including Mona, are therefore planned to be in highly visible locations. The numerous large pylons and gantries accompanying them also have a substantial and irreversible impact in themselves.	The cumulative landscape and visual effects are assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement (Document Reference F3,6). The project has reduced the height and scale of the substation buildings, as well as micro-siting the substation platform, to reduce impacts. The design of the substation is outlined in the Design Principles Document (Document reference J3). The proposed mitigation is shown on the Illustrative Landscape and Ecology Strategy Plan (Figure A.6.4). An outline LEMP has been included in the application (Document reference J22). As stated in Volume 4, Chapter 4: Human health assessment of the Environmental Statement (Document Reference: F4.4): 'Visual impacts of onshore infrastructure, including the onshore substations, are not expected to be of a scale that could affect population health outcomes'.	Yes
Mon_080_001_040623	S47	Email	Thank you for the opportunity to respond to the BP/EnBw Morgan and Mona windfarms consultation which ends today. Our response welcomes the development proposals, their preferred locations, landfall point, development methods, scale and commitments to invest in recruiting the required construction and operations and maintenance skills in and around the still to be selected preferred port locations from the shortlist of England's ports of Barrow, Heysham and Liverpool /Birkenhead and from Holyhead and Mostyn in Wales. We have reviewed the documentation in the light of national and regional policy contexts including the Net Zero North West Economic Investment Prospectus and the Cumbria Clean energy strategy (see 2208-CumbriaCleanEnergyStrategy.pdf (thecumbrialep.co.uk)). The Clean energy strategy focus is on stimulating new developments in: • offshore wind, • hydrogen, • Carbon capture and storage • nuclear power generation both for electricity generation and steam raising for use in in nuclear powered submarines • improving adoption of lower carbon technology and new energy efficiency measures Its ambition is for "Cumbria ports will provide the O&M hub of a growing regional offshore wind capacity making a significant contribution to UK clean energy requirements. This is further supported by growing Cumbria's specialist manufacturing capability and a world-wide reputation for offshore operations skills development." It adds, "there is a significant role that can be played by Barrow and Workington to both support construction and importantly to provide the maintenance and operations bases."	The Applicant notes your response	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_080_002_040623	S47	Email	The Furness area has engaged with the offshore wind industry since 2002 and enabled four phases of development in 2005/2006, 2010/2012, 2014 and 2018. The planned build of the Morgan and Mona projects over 4 "annual build seasons" between 2026 and 2030 is a fifth opportunity to further grow this relatively new sector, diversify the local economy and enable BP/EnBw to capitalise on the skills infrastructure and support services within the Furness peninsula and NW England.	Whilst the project provides opportunities for good quality employment, which are noted as beneficial for health, these are not on a scale with the potential for significant population level effects. Consideration has been given to how benefits, including for local and vulnerable groups, could be enhanced. An Outline Skills and Employment Plan has been produced (Document Reference J24). The potential for tailoring opportunities to local and vulnerable groups will be considered as that plan is developed	
Mon_080_003_040623	S47	Email	Exiting offshore wind operations within south west Cumbria support around 350 jobs each year directly with wind farm operators, original equipment manufacturers and with specialist contractors and up to 17 crew change vessels out of the port of Barrow. SOV support ships also use the port as a base. This skillsbase has built from nothing prior to 2005 through people transferring skills from existing locally based industry, people relocating to the area, through growth and graduation of apprentice skills learning and through weekly resident contractors supplementing that workforce. It is anticipated that trend would contribute to underpin availability of the skills to support construction operation and maintenance of the Morgan Mona and Morecambe windfarm projects both during the 2026-2-30 build period and in the subsequent 35 year operating life of the turbines and any future repowering. The area has a track record as one of the fastest growing coastal regions of the UK, offering good wages and career prospects, since 2003 the shipyard workforce has grown from 3,000 to nearly 10,500 and a further 6000 to 7000 are planned. Offshore wind has grown from 10 jobs in 2006 to the 350 now. Thes people and their organisations have accumulated 17-18 years operating experience in the E. Irish Sea, that will be 20+ years by the time the BP/EnBw build starts. Additional families will create a larger pool of labour to call upon by the BP/Enbw team as it delivers its projects. Furness College delivers offshore windfarm technician apprenticeship training alongside specialist engineering apprentice training. Gen 2 also has a local presence. University of Cumbria is building a multimillion pound new campus at Barrow which will focus on delivering degree courses in its institute of engineering, computing and manufacturing under professor Jill Stewart. Each year around 1,000 secondary school students go on to take apprenticeships or further education courses. Barrow has one of the highest apprenticeship take up rates in England.	The Applicant notes your response	Yes
Mon_080_004_040623	S47	Email	Each year Furness Education and Skills Partnership delivers Build my skills engagement between businesses and schools throughout Furness supplementing this with Stem Fest days designed to interest young people in careers in offshore wind and other energy transition sectors. One of the locally based wind farm operators has also started using its facilities at Barrow to train technicians from overseas working alongside the technicians embedded locally. Accommodating skilled people is identified as a requirement by BP /EnBw. In Furness we have a mature Accommodation Hub advisory service supporting companies and individuals with finding accommodation it links networks of providers with companies whose staff may need to identify housing apartments hotels or guest house accommodation, since 2015 it has been supporting a wide range of personnel and	The Applicant notes your response	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			businesses as part of our effort to grow business tourism and attract investment by internationally branded hotels and by developers offering new accommodation. current work is focusing on a housing growth strategy		
Mon_015_021_160623	S42/S44	Email	Other matters Members of the Planning Committee have raised concerns over the potential for heat radiation from the underground cables to affect human health and animal health. The developer is requested to address these matters in the ES.	Please refer to Volume 4, Chapter 4: Human health assessment of the Environmental Statement (Document Reference: F4.4).	Yes
Mon_128_001_230423	S44	Feedback form	It is unclear from the documentation about the specific impact the construction of the onshore elements will have on the local communities. What plans are in place to manage disruption to local traffic, farmland. and infra structure. What if any are the benefits to the local communities? are there any proposals in place eg provision of cheaper energy to the local communities, financial assistance to local	The management of construction traffic is set out in the Construction Traffic Management Plan. Impacts on local communities are assessed in Volume 4, Chapter 4: Human health assessment of the Environmental Statement (Document Reference: F4.4).	No
Mon_131_001_280423	S47	Feedback form	community groups/ charities? There are enough wind farms in the Irish sea already. The hum they produce are causing me to have sleep disturbances and the hum is constant which I can only escape when I am away from home.	The Applicant notes your response	No
Mon_149_005_260523	S47	Feedback form	The health and well being of local residents will be disrupted by the infrastructure arriving.	Volume 4, Chapter 4: Human Health of the Environmental Statement (Document Reference: F4.4) follows guidance (IEMA 2022) in providing a population health assessment. The assessment has regard to vulnerable groups, and in this case assigns them the highest level of sensitivity, but (in line with the assessment methodology set out in guidance) does not reach conclusions on individual level health outcomes. The Environmental Statement Human Health chapter has had regard to local sensitivities, including in relation to age, health status and income, across the scope of issues covered by the assessment. The health assessment scope includes the public health implications of construction effects.	
Mon_158_002_020623	S44	Feedback form	Cefn Meiriadog now has the St Asaph Business Park as its neighbour, but this should not result in BP using this as an excuse to industrialise a rural community any further than it already has been. Resultant ill effects on the community health and wellbeing will be for certain. Farming life will have unacceptable restrictions, resulting in farming businesses suffering losses and mental ill-health. It may likely be irrevocable, after generations of same family farming!	Volume 4, Chapter 4: Human Health of the Environmental Statement (Document Reference: F4.4) follows guidance (IEMA 2022) in providing a population health assessment. The assessment has regard to vulnerable groups, and in this case assigns them the highest level of sensitivity, but (in line with the assessment methodology set out in guidance) does not reach conclusions on individual level health outcomes. The Environmental Statement Human Health chapter has had regard to local sensitivities, including in relation to age, health status and income, across the scope of issues covered by the assessment. The health assessment scope includes the public health implications of construction effects. Volume 3, Chapter 7: Land use and Recreation of the Environmental Statement (Document Reference F3.7) has assessed the impacts on	
	0.11			agriculture.	
Mon_158_017_020623	S44	Feedback form	Human health is vital as is electricity, there is not only financial cost. NSIP's must be proportionate; a small community must not bear all 'human cost'. Cefn Meiriadog residents are facing disproportionate energy projects which due to the size, number of projects, length of work, rural loss will have huge negative impacts resulting in poor mental health/illness. UK Suicide rates are increasing, this must not be ignored especially in a farming community. For onshore electrical infrastructure, the project will adopt ICNIRP guidelines 1998.	Volume 4, Chapter 4: Human Health of the Environmental Statement (Document Reference: F4.4) follows guidance (IEMA 2022) in providing a population health assessment. The assessment has regard to vulnerable groups, and in this case assigns them the highest level of sensitivity, but (in line with the assessment methodology set out in guidance) does not reach conclusions on individual level health outcomes. The Environmental Statement Human Health chapter has had	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			ICNIRP is not concerned with precaution in the face of uncertainty but sets higher compliance levels for 'established' harm. BP fail to mention evidence-based concern of POSSIBLE health risk. Childhood leukaemia risk doubles at around 0.4 microtesla. WHO classifies such exposures as IARC 2B, a possible human carcinogen. Cumulative EMF health risks must not be ignored with multiple projects. Precaution is relevant, but not mentioned in PEIR.	regard to local sensitivities, including in relation to age, health status and income, across the scope of issues covered by the assessment. The health assessment scope includes the public health implications of construction effects.	
Mon_158_023_020623	S47	Feedback form	There will be considerable disruption with noise and vibration during construction. This MUST be evaluated cumulatively with other concurrent energy developments (Awel y Mor, NG extensions and other works, Mares Interconnect, Solar farm). It is a failure and intransigent of BP to just provide indicative figures for BP Mona alone, as Cefn Meiriadog will be affected by many large infrastructure construction projects simultaneously. Residents are described as being highly vulnerable (agreed), have high recoverability (disagreed as mental health will definitely be seriously affected; what measures are used to specify this term?) and be of medium value (what specific measure decides the value of a noise receptor?). You state that CoCP includes a noise management plan including communication with the local community. In reality, there is no real-time mechanism allowing residents to deal with daily problems, leading to residential stress and ill health. The noise will not be 9-5 Mon-Fri!	The noise and vibration impacts associated with the Mona Offshore Wind Project are assessed in Volume 3, Chapter 9: Noise and vibration of the Environmental Statement (Document Reference F3.9). Cumulative impacts are also assessed where information on project is publicly available	No
Mon_161_003_020623	S47	Feedback form	How are Mona plus future projects and National Grid propose to protect staff and electronic equipment in the St. Asaph Business Park which will have at least ten substation surrounding the park generating health and safety issue.	Volume 4, Chapter 4: Human health of the Environmental Statement (Document Reference: F4.4) follows guidance (IEMA 2022) in providing a population health assessment. This assesses the impact of electrical equipment on people's health, there will be no impact from the Mona Offshore Wind Project or cumulatively when considering other planned projects.	No
Mon_164_012_040623	S44	Feedback form	The impact of two years of construction will be very negative on local tourism, and the wellbeing of local resident.	The Applicant is committed to minimising disruption to local residents. A Code of Construction Practice (CoCP) will be produced and agreed with the relevant local authority. An Outline Code of Construction Practice (Document Reference J26) is provided as part of the application. The CoCP will identify the likely impacts of constructions works and propose appropriate mitigation measures and set out how those measures will be communicated to local communities.	No
Mon_189_003_020623	S47	Consult Online	The noise will impact those nearby and it is too close to St Asaph centre.	The impacts of noise and vibration are assessed in Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement (Document Reference F3.8)	No
Mon_190_002_020623	S47	Email	this is a well established site and we mainly serve the elderly on our site for a quiet and peaceful retreatsome also have illnesses and love the rural area	The Applicant notes your response.	No

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D.25.30 Draft Habitats Regulations Assessment table of responses



Table D.25. 30: Draft Habitats Regulations Assessment table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_007_001_230423	S44	Email	In the Habitats Regulation Assessment Stage 2 - Information to support appropriate assessment. Page 87 schematic (updated 9/2/23) shows Mares interconnect as connection to National Grid via the Dee estuary into Connahs Quay. Can you confirm that the connection point for Mares is subsea connection to Connahs Quay as shown	The Mares Connect project is at an early stage of planning, and therefore has multiple potential connection options. These are shown on a number of figures within the Environmental Statement, for example Figure 10.7 of Volume 2, Chapter 10: Other Sea users of the Environmental Statement.	No
Mon_054_105_010623	S42/S44	Email	 Habitats Regulations Assessment Stage 2 Information to Support an Appropriate Assessment Please note that some of the concerns raised above are also applicable to the Habitats Regulations Assessment (HRA)Stage 2 Information to Support and Appropriate Assessment (ISAA), in particular: No survey data has been presented in the PEIR to understand whether there are any potential Annex I features present within the cable route •Information on the potential locations of cable protection along the export cable route has not been presented Without the above information it is not possible to fully assess the potential impacts of the development on the Menai Strait and Conwy Bay SAC. 	therefore be no direct impacts to any designated feature of the SAC and	No
Mon_054_106_010623	S42/S44	Email	NRW (A) seek clarification regarding Table 1.3 A summary of all European sites for which the potential for LSE could not be discounted at the Stage 1 screening stage and for which appropriate assessment is required, on why the Dee Estuary SAC features have been screened into the ISAA and not into the PEIR. If a potential impact pathway is identified here, it is also applicable in the PEIR.	As demonstrated by the physical processes modelling (which was not available at the time of writing the LSE screening), there is no route to impact for the Dee Estuary SAC as it is outside the ZoI of the Mona Offshore Wind Project. Therefore the features of the Dee Estuary SAC have not been considered in the Benthic subtidal and intertidal ecology chapter of the Environmental Statement. The LSE screening for the final application has also been updated to now screen out the Dee Estuary for Annex I habitats on the basis of no receptor-impact pathway.	No
Mon_054_107_010623	S42/S44	Email	Also regarding Table 1.3, NRW(A) advise that the potential introduction of invasive non-native species should also be screened in for the relevant qualifying features of the Menai Strait and Conwy Bay SAC. The impact should then be taken through to the stage 2 appropriate assessment stage where the relevant mitigation measures i.e. the production and adherence to a Biosecurity Risk Assessment can then be implemented.		No
Mon_054_108_010623	S42/S44	Email	Furthermore in Table 1.3, NRW (A) note that only the Annex I Reef and Annex I Sandbanks which are slightly covered by seawater all the time features have been screened in for the Menai Strait and Conwy Bay SAC. Clarification is sought on whether the potential for increases in Suspended Sediment Concentration (SSC)and sediment deposition could extend to other features of the SAC i.e. Submerged or partially submerged seacaves? It would be useful to see a map with the extent of the plume against the features of the Menai Strait and Conwy Bay SAC and also against the Dee Estuary SAC features to understand any potential overlap.	The assessment of increased SSC and sediment deposition in section 2.9.2 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and the Stage 2 ISAA has been updated to include further detail regarding the predicted nature of extent of plumes resulting from export cable installation in the Menai Strait and Conwy Bay SAC and noting that sandwave clearance has been removed from the PDE for the SAC. The modelled output presented in Volume 6, Annex 1.1: Physical processes technical report of the Environmental Statement includes scale bars and the applicable designated areas to aid in the interpretation of findings. The appropriate text relating to the modelled outputs and the SAC has been incorporated into the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and the Stage 2 ISAA. Due to the nature of the tidal flow, mobilised sediment is carried offshore and will not accumulate along the coastline (including the coastline within the SAC) and therefore there is considered to be no potential for an LSE on the submerged or partially submerged seacaves feature of the SAC.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_054_109_010623	S42/S44	Email	In Section 1.7.2.41Conservation Objectives, NRW (A) advise that the conservation objectives for the Dee Estuary SAC should be taken from the Regulation 33 advice package as these are the agreed conservation objectives for cross-border sites: Dee Estuary-Reg33-Volume 1-English-091209_1.pdf (naturalresources.wales)	Noted and the conservation objectives for the Dee Estuary SAC has been taken from the Regulation 33 advice package in the ISAA.	No
Mon_054_110_010623	S42/S44	Email	With reference to Table 1.7: Measures adopted as part of the Mona Offshore Wind Project relevant to the assessment of adverse effect on European sites designated for Annex 1 habitat features from temporary habitat loss/disturbance, NRW (A) advise that a full Biosecurity Risk Assessment and Invasive Non-Native Species (INNS) Management Plan is completed in relation to all marine operation activities associated with the current proposal. The risk assessment and management plan should include consideration of all activities, vehicles and equipment used as well as how the risk will be minimised through appropriate mitigation and adherence to best practice guidance and management measures. The risk assessment should include a review of all the available data in relation to the presence of marine INNS where applicable to the current proposal, and the potential risks associated with each species identified.	Response noted. A Biodiversity Risk Assessment and INNS Management Plan will be included within the Environmental Management Plan.	No
Mon_054_111_010623	S42/S44	Email	With reference to Sections1.7.3.36–38 Reefs, as noted previously, no spatial figures have been presented to understand the extent of the sediment plume and potential interactions with Annex I features of the Menai Strait and Conwy Bay SAC. Furthermore, until the results of the export cable route survey are presented, NRW (A) are unable to assess whether there are any potentially sensitive habitats that could be impacted by the plume, we are therefore unable to agree with the conclusions at this point.	The assessment of increased SSC and sediment deposition in section 2.9.2 of the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and in the Stage 2 ISAA has been updated to include further detail regarding the predicted nature of extent of plumes resulting from export cable installation in the Menai Strait and Conwy Bay SAC and noting that sandwave clearance has been removed from the project design for the SAC. The modelled output presented in Volume 6, Annex 1.1: Physical processes technical report of the Environmental Statement includes scale bars and the applicable designated areas to aid in the interpretation of findings. The appropriate text relating to the modelled outputs and the SAC has been incorporated into the Benthic subtidal and intertidal ecology chapter of the Environmental Statement and the Stage 2 ISAA. Due to the nature of the tidal flow, mobilised sediment is carried offshore and will not accumulate along the coastline (including the coastline within the SAC) and therefore there is considered to be no potential for an LSE on the submerged or partially submerged seacaves feature of the SAC.	No
Mon_054_112_010623	S42/S44	Email	With reference to Sections1.7.3.95–99, should the results of the ECR survey data show that the cable route interacts with Annex I features of the Menai Strait and Conwy Bay SAC, the applicant will need to assess and carefully consider any potential long-term habitat loss to these features against the conservation objectives for the SAC. At this point and without the survey data, NRW (A)are unable to agree with the conclusions presented here for the potential long-term habitat loss of Annex I Reef and Annex I Sandbanks which are slightly covered by seawater all the time. We note there is a commitment to investigate opportunities to limit the extent of cable protection within the Menai Strait and Conwy Bay SAC. NRW (A) welcome this commitment and as per our advice during pre-application consultation, encourage the applicant to not place any cable protection within the SAC and in particular within Annex I features.	Furthermore, the refinements to the project design since PEIR have resulted in a reduction in the extent of cables requiring cable protection within the SAC from 2,800 m in the PEIR to 800 m for the final application resulting in the long term loss of 8,000 m2 of non-designated habitats in the SAC (a reduction from 28,000m2 at PEIR), which represents 0.003% of the total area of the SAC.	
				HRA: on the basis that there is no direct overlap with any designated features of the Menai Strait and Conwy Bay SAC, all direct impacts, including long term habitat loss, have been screened out of the ISAA on the basis of no LSE.	
Mon_054_113_010623	S42/S44	Email	With reference to Section 1.7.3.107-122Changes in Physical Processes, further information on the potential locations of the cable protection inside and outside the	Cable protection will only be used where sufficient trenching depths cannot be achieved. Investigations have be undertaken to identify opportunities to limit	Yes



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			SAC is required in order to understand any potential impacts to changes in physical processes which may have indirect impacts on Annex I benthic features of the SAC. Furthermore no assessment on secondary scour has been carried out. Please refer to Section 1.1Physical Processes of the current document for further information.	protection higher than 70 cm will be installed within in the Menai Strait and	
Mon_054_126_010623	S42/S44	Email	Detailed comments 1.4.2.1 HRA Screening Report, Screening Matrices and Integrity Matrices. With reference to Section 1.3.3.6, Initial Identification for Annex II fish, NRW(A) welcomes the adaptation of the regional screening approach for Atlantic salmon (and pearl mussel).	The Applicant notes your response	No
Mon_054_127_010623	S42/S44	Email	With reference to Section 1.4.4.3, Dee Estuary/Aber Dyfrdwy SAC, NRW (A) note that although twaite shad (Alosa fallax) have been recorded in a fish trap on Chester weir near the tidal limit of the River Dee, there are no records of a spawning population in the river.	Thank you for this feedback, reference to this statement has been incorporated into Volume 6, annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement to support baseline characterisation, and the HRA Stage 2 ISAA Part 1: Intro and background and Part 2: SAC assessments.	No
Mon_054_172_010623	S42/S44	Email	Marine Mammals1.5.1Key Issues NRW (A) does not agree with the approach taken to assess the area disturbed for harbour porpoise. Only the Effective Deterrent Range (EDR) approach has been used for the assessment of disturbance associated with pile driving during the construction phase to assess impacts on harbour porpoise features in the North Anglesey Marine SAC. Based on the modelled contours provided in the PEIR, it is difficult to rule out absence of an adverse effect on the North Anglesey Marine SAC for the Maximum Design Scenario (MDS) of two simultaneous monopiles drives. NRW (A) strongly advise that further information based on noise thresholds is provided, as we are currently unable to rule out an absence of Adverse Effect On Site Integrity (AEOSI) for harbour porpoise. NRW (A) recommends that in addition / in parallel to EDRs, an unweighted noise threshold of 143 dB re 1μPa (or 103 dB re 1μPa VHF-weighted) single strike sound exposure level (Brandt et al.,2018; Heinis et al.,2019) should be used to represent the minimum fixed noise threshold at which significant disturbance would occur from impulsive noise sources.		No
Mon_054_191_010623	S42/S44	Email	With reference to Table 9.17 Tertiary measures: Measures included as part of the project design and Section 9.7 Measures adopted as part of the Mona Offshore Wind Project, the use of noise mitigation strategies / attenuation technology such as bubble curtains, timing of piling (given North Anglesey MarineSACis a summer site), or piling methods have not been proposed as potential mitigation methods. Given the impact ranges calculated in Volume 5, Annex 3.1: Underwater sound technical report, NRW (A) strongly recommend that these are considered and included in any future mitigation plan. Whilst there is the potential that mitigation might not be formally required for the purposes of removing AEOSI in the Habitats Regulations Assessment (HRA) or reducing significant effects in the Environmental	The assessment of effects has determined that there is only one potential significant effect predicted for the Mona project alone, for UXO clearance of the maximum UXO size where high order detonation is required. Recognising this and the potential for cumulative effects, the Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Consequently, if NAS is	Yes



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			Impact Assessment (EIA), it should be incorporated in accordance with industry best practice, to reduce effects in relation to European Protected Species (EPS).	required a detailed exploration of available technologies will be undertaken and information presented to demonstrate how such technology would contribute to the reduction in underwater sound from piling. Project refinements and potential mitigation options will be considered within the Underwater sound management strategy, an outline of which has been submitted with the application for consent with a more detailed marine mammal mitigation protocol. The Underwater sound management strategy will be updated post-application, discussed and agreed with stakeholders.	
Mon_054_198_010623	S42/S44	Email	Based on the contours provided in Figure 9.5 Concurrent piling of monopiles at a maximum hammer energy of 5,000 kJ at the greatest spatial extent showing SELSS contours in 5dB isopleths, it could be difficult to rule out an adverse effect on the North Anglesey Marine SAC for the MDS of two simultaneous monopiles. NRW (A) strongly advise that further information based on noise thresholds is provided as currently, we are unable to rule out an AEOSI for harbour porpoise. During EWG2 (July 2022) and EWG03 (November 2022), and in subsequent written comments, NRW (A) recommended that in addition / in parallel to EDRs, an unweighted noise threshold of 143 dB re 1µPa (or 103 dB re 1µPa VHF-weighted) single strike sound exposure level (Brandt et al.,2018; Heinis et al.,2019)should be used to represent the minimum fixed noise threshold at which significant disturbance would occur from impulsive noise sources. This fixed noise threshold is the modelled average of six different studies of full-scale pile driving operations and thereby represents a large amount of empirical data (Tougaard 2021). Following bespoke noise modelling the 143 dB re 1µPa noise contour should be displayed on a map of the area to determine the extent of the SAC that would be ensonified to this level of noise disturbance. Further information on NRW's approach to assessing disturbance from piling for harbour porpoise can be obtained from our recent position statement (NRW, 2023b).	NRW's position statement (NRW, 2023b) has been reviewed and subsequently the approach to the assessment of disturbance resulting from piling sound has been reviewed and updated. An unweighted sound threshold of 143 dB re 1µPa (or 103 dB re 1µPa VHF-weighted) has been presented in the Volume 2, Chapter 4: Marine mammals of the Environmental Statement to represent a fixed sound threshold at which significant disturbance could occur. This has been carried forward to the HRA and presented alongside the effective deterrence range (EDR) as a area-based threshold for the purposes of understanding potential overlap with SAC habitat.	
Mon_054_244_010623	S42/S44	Email	The use of noise mitigation strategies / attenuation technology such as bubble curtains, timing of piling (given North Anglesey Marine is a summer site), or piling methods have not been proposed as potential mitigation methods in Table 9.55 Summary of potential environmental effects, mitigation and monitoring. Given the impact ranges calculated in Volume 5, Annex 3.1: Underwater sound technical report, NRW (A) strongly recommend that these are considered and included in any future mitigation plan. Whilst there is the potential that mitigation might not be formally required for the purposes of removing AEOSI in HRA or reducing significant effects in EIA, it should be incorporated in accordance with industry best-practice to reduce effects in relation to EPS protection.	The approach to the assessment of disturbance resulting from piling sound has been reviewed and updated. An unweighted sound threshold of 143 dB re 1 μ Pa has been applied to represent the minimum fixed sound threshold at which significant disturbance could occur for the final application in addition to the EDR approach for the purposes of HRA. The position statement (NRW, 2023b) has been reviewed and incorporated to the assessment where relevant.	No
Mon_054_258_010623	S42/S44	Email	HRA Screening Report, Screening Matrices and Integrity Matrices NRW (A) recommend that barrier effects are scoped into the Likely Significant Effects (LSE) in Section 1.4.5 Assessment of LSE for Annex II marine mammals.	Barrier effects have been considered within the underwater sound impact assessment for marine mammals. Additional detail has been provided in Volume 2, Chapter 4: Marine mammals of the Environmental Statement to cover this impact. The potential for barrier effects has also been carried forward for consideration in the HRA.	No
Mon_054_259_010623	S42/S44	Email	NRW (A) tentatively agree to the conclusion of no LSE from vessel collision risk in Section 1.4.5.8Assessment of LSE for Annex II marine mammals, however, we advise that the increase in the number of vessels versus the baseline should be quantified.	We note NRW advice on the quantification of effects from injury/disturbance due to vessel sound. We agree that there is evidence to suggest that vessel sound can lead to disturbance to some marine mammals species, and have modified the assessment approach to give additional quantification as to the potential effects from vessel disturbance based on further review of published studies. The LSE screening has been updated to include baseline levels of vessel movements in the Mona Offshore Wind project together with the uplift in vessels anticipated during the construction, operation and maintenance and decommissioning phases. There is no overlap between the Mona Offshore Wind Project and any SAC designated for Annex II marine mammals (the	No





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				closest SAC being the North Anglesey Marine/Gogledd Môn Forol SAC which is located at a distance of 22.8 km from the Mona Array Area, all other SACs are located >80 km from the Mona Array Area). Therefore, the likelihood of collisions occurring between vessels and marine mammal features of SACs is considered to be low. Vessel collision risk has, therefore, been screened out of the ISAA on the basis of no LSE.	
Mon_054_260_010623	S42/S44	Email	NRW (A) disagree with the statement in Section 1.4.5.31Assessment of LSE for Annex II marine mammals, "Given the highly precautionary method for site selection applied during this Screening assessment". The use of MUs as the appropriate screening distance is due to the fact that marine mammal populations are wide ranging, and MUs appropriately capture the range of such populations.	Comment noted and text has been reviewed and updated within Volume 2, Chapter 4: Marine mammals of the Environmental Statement and updated within the HRA Stage 1 Screening Report.	No
Mon_054_261_010623	S42/S44	Email	Habitats Regulations Assessment Stage 2 Information to Support an Appropriate Assessment NRW (A) disagree with the statement in Section 1.5.3.6 Summary of LSE screening conclusions, that the approach to selection of relevant sites was precautionary. As noted above, the use of MUs appropriately captures the wide-ranging nature of marine mammal populations.	Comment noted and text has been reviewed and updated within Volume 2, Chapter 4: Marine mammals of the Environmental Statement and updated within the HRA Stage 1 Screening Report.	No
Mon_054_262_010623	S42/S44	Email	In Section 1.5.3.7 Summary of LSE screening conclusions, with regard to the grey seal MU, reference should be made to the OSPAR Region III interim MU and the relevant NRW position statement (NRW, 2022).	The use of OSPAR Region III has been discussed further with the marine mammal EWG and will be used for the CEA screening area for grey seals in Volume 2, Chapter 4: Marine mammals of the Environmental Statement. The HRA Stage 1 Screening report now considers European sites within the OSPAR Region III Interim MU designated for grey seal, however telemetry data from Wright and Sinclair (2022) has then been used to capture any SACs with potential connectivity to the Mona Offshore Wind Project.	No
Mon_054_263_010623	S42/S44	Email	NRW (A)recommend that Section 1.9.1.6 Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, is amended for clarification. For grey seal, NRW (A) previously advised the use of the OSPAR Region III MU as per NRW's Position Statement on the use of marine mammal MU's for screening and assessment in HRA for SACs with marine mammal features. We agreed with the proposal to use the combined Wales MU, North West England MU, SW Scotland and Northern Ireland MU for grey seal in parallel with the OSPAR RegionIII MU. We recommend that any similar statements within the document be amended. NRW (A) also agreed that the foraging ranges from Carter et al.,(2022)would be a suitable alternative as these also capture the movement ranges of grey seal.		No
Mon_054_264_010623	S42/S44	Email	NRW (A)recommend that Section 1.9.2.77 Baseline information, is amended for clarification. There is also strong evidence (through photo-ID and telemetry studies) that grey seals range beyond Welsh SACs, also encompassing Southwest England, Northwest France and Ireland (Baines et al.,1995; Carter and Russell,2018; Jones et al.,2013; Keily et al.,2000; Langley et al.,2018, 2020; Pomeroy et al.,2014; Russell et al.,2017; Vincent et al.,2005, 2017; Russell et al.,2019, Carter et al.,2020, Luck et al.,2020). We recommend that any similar statements within the PEIR documents are amended.	The baseline presents a comprehensive assessment of the foraging ranges of grey seals moving between key haul outs and the Mona Array Area. Further detail has been provided with respect to connectivity in Volume 2, Chapter 4: Marine mammals of the Environmental Statement and relevant information has been carried forward to the HRA.	No
Mon_054_265_010623	S42/S44	Email	With reference to Table 1.101 Measures adopted as part of the Mona Offshore Wind Project relevant to the assessment of adverse effect on European sites designated for Annex II marine mammal features from underwater sound during the construction phase, please refer to Paragraphs 151 and 164of the current document advising the use of noise mitigation strategies / attenuation technology.	Measures adopted as part of the Mona Offshore Wind Project have been presented in Volume 2, Chapter 4: Marine mammals of the Environmental Statement including use of low order UXO clearance methods, limitations on vessel speed and consideration of NAS based on the information available at application. The Applicant will continue to explore options for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Mona Offshore Wind Project design have been made on this basis. A commitment to Noise Abatement Systems (NAS) will be considered as part of a stepped strategy	Yes



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				post consent and following the mitigation hierarchy - avoid, reduce, mitigate. Consequently, if NAS is required a detailed exploration of available technologies will be undertaken and information presented to demonstrate how such technology would contribute to the reduction in underwater sound from piling. Project refinements and potential mitigation options will be considered within the Underwater Sound Management Strategy (USWMS), an outline of which has been submitted with the application for consent with a more detailed marine mammal mitigation protocol. The USWMS will be updated post-application, discussed and agreed with stakeholders.	
Mon_054_266_010623	S42/S44	Email	NRW (A)disagree with the conclusion presented in Section 1.9.3.18 Assessment of adverse effects alone, that the extent of disturbance (from piling) is likely to be an overestimate due to impulsive noise losing its characteristics with range, particularly for harbour porpoise. Please refer to our comments in Paragraph 170of the current document relating to Section 9.8.3.39 Behavioural Disturbance. We also recommend including reference to the Level B Harassment threshold for continuous noise of 120 dB SPLrms.	how sound propagates, how the waveform of impulsive sounds elongates with distance and reflects the current understanding of the	Yes
Mon_054_267_010623	S42/S44	Email	In Section 1.9.3.19 Assessment of adverse effects alone, please refer to our comments in Paragraphs146and 157, regarding the use of a more up to date peak seasonal density for harbour porpoise from the latest edition of the Marine Mammal Atlas (Evans and Waggitt, 2023). NRW (A) advise that any assessments of magnitude and significance, population modelling, and conclusions for harbour porpoise in the PEIR documents are revised with an updated density.	The quantitative assessment for Volume 2, Chapter 4: Marine mammals of the Environmental Statement has applied the most recent, and precautionary, densities from the Welsh Marine Mammal Atlas (Evans and Waggitt, 2023) as recommended by NRW and therefore the number of animals predicted to be affected has been adjusted accordingly. The amendments made to the text and numbers presented in Volume 2, Chapter 4: Marine Mammals of the Environmental Statement have been carried over to the assessments presented in the ISAA.	No
Mon_054_268_010623	S42/S44	Email	NRW (A)note in Section 1.9.3.20 Assessment of adverse effects alone, that for bottlenose dolphin, dual densities have been used for the assessment; the outer Cardigan Bay density (0.035 / km2) within a 6km region from the coastline, and the Scans III block E densities elsewhere (0.0082 / km2). As per our comments in Paragraph 158,to avoid the use of dual densities and overly precautionary conclusions, we have previously advised (and provided) the use of densities taken from the newest version of the Marine Mammal Atlas (Evans and Waggitt, 2023). Density values provided for the Mona array area and Mona study area were 0.0011/ km2and 0.0018 / km2respectively.	The quantitative assessment for Volume 2, Chapter 4: Marine mammals of the Environmental Statement has applied the most recent, and precautionary, densities from the Welsh Marine Mammal Atlas (Evans and Waggitt, 2023) as recommended by NRW and therefore the number of animals predicted to be affected has been adjusted accordingly. The amendments made to the text and numbers presented in Volume 2, Chapter 4: Marine Mammals of the Environmental Statement have been carried over to the assessments presented in the ISAA.	No





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Mon_054_269_010623	S42/S44	Email	NRW (A) do not agree with the approach taken in Sections 1.9.3.26 –30 / 1.9.4.10 –15 Assessment of adverse effects alone, to assess the area disturbed for harbour porpoise. Only the EDR approach has been used for the assessment of disturbance associated with pile driving during the construction phase to assess harbour porpoise features in the North Anglesey Marine SAC. Although the use of an EDR can be a useful, practical way of calculating the area over which effects may occur, NRW (A) considers that there is still considerable uncertainty in the evidence underpinning the calculation of these EDRs. As such, in contrast to the text in Section 1.9.3.26, this approach is not in line with guidance from NRW. Based on the modelled contours provided in Volume 2 Chapter 9, Figure 9.5Concurrent piling of monopiles at a maximum hammer energy of 5,500 kJ at the greatest spatial extent showing SELss contours in 5dB isopleths, it is difficult to rule out absence of an adverse effect on the North Anglesey Marine SAC for the MDS of two simultaneous monopiles. It is crucial that further information is provided as currently NRW(A) would not be unable to rule out an absence of adverse effect on site integrity for harbour porpoise. Further information on NRW's approach to assessing disturbance from piling for harbour porpoise can be obtained from our recent position statement (NRW, 2023b). Please also refer to our comments in Paragraph 171of the current document.	The approach to the assessment of disturbance resulting from piling sound has been reviewed and updated. An unweighted sound threshold of 143 dB re 1µPa has been applied to represent the minimum fixed sound threshold at which significant disturbance could occur for the final application in addition to the EDR approach for the purposes of HRA. The position statement (NRW, 2023b) has been reviewed and incorporated to Volume 2, Chapter 4: Marine mammals of the Environmental Statement where relevant and the ISAA.	No
Mon_054_270_010623	S42/S44	Email	Further detail should be provided in Section1.9.4.2 Assessment of adverse effects in-combination, with respect to how collective contributions were assessed for impact pathways where LSE had been ruled out with respect to Mona OWF alone.	Further detail has been added in the HRA Stage 1 Screening report where collective contributions assessed for impact pathways had been ruled out with respect to Mona Offshore Wind Project alone for the purpose of determining LSE.	No
Mon_054_271_010623	S42/S44	Email	NRW (A) recommend inclusion of Project Valorous in the list of Tier 2 projects in Table 1.167List of other projects and plans with potential for in-combination effects on Annex II marine mammal features	Project Valorous has been included in the CEA long list for consideration in all cumulative assessment where relevant.	No
Mon_054_272_010623	S42/S44	Email	With reference to Sections 1.9.4.10 –15 Assessment of adverse effects incombination, the use of MUs as the appropriate screening distance has not always been followed when screening in projects for the assessment of potential cumulative effects. No justification has been provided for only considering the cumulative impacts of piling from Awel y Môr. Marine mammal populations are wide ranging, and MUs appropriately capture the range of such populations. The purpose of the cumulative assessment is to assess the impact of all projects whose construction phases overlap temporally with the construction phase for the Mona Offshore Wind Project and could potentially impact a population within a given MU. Thus all projects that fall within that MU should be screened in.		No
Mon_054_273_010623	S42/S44	Email	In conjunction with our comment on the use of EDRs above, NRW (A) note that the in-combination assessment has been carried out using only the EDR disturbance footprint from Awel yMôr. In the Awel yMôr Report to Inform Appropriate Assessment (RIAA), an alternative approach using dose response curves was also presented. In our response to the AwelyMôr application, NRW(A)disagreed with the use of dose response curves for area-based assessment. Although there is a strong link between the area of habitat and number of animals it supports, loss of habitat quality is a binary event as an area is either ensonified by a sound at a given level (and hence 'lost'), or not. This differs from behavioural disturbance of animals which occurs over a continuum and relates to the numbers of animals affected; the spatial / temporal thresholds for HRA are not concerned with numbers of animals. This is because harbour porpoise is a highly mobile species, able to travel hundreds of kilometres in a short period of time, part of a large wide-ranging population with highly variable numbers of animals spatially and temporally, hence the concept of a 'site population' does not apply. The chosen approach for assessing the impacts of noise on harbour porpoise SACs was grounded in quantifying the loss of habitat available to harbour porpoise as a result of	(Tougaard, 2021) (detailed in Volume 2, Chapter 4: Marine mammals of the Environmental Statement) and EDR area based thresholds to the HRA (HRA Stage 1 Screening report) for final Application and removed the use of dose-	No





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			disturbance, given that the SACs were designated based on higher persistent densities than other areas within the harbour porpoise MU(JNCC 2020a, b; NRW 2023b). Despite this, sufficient information was provided in Table 13 of the Awel y Môr RIAA to allow NRW (A) to conclude no adverse effect on the North Anglesey Marine SAC. This was done by adding the areas of the 145 and 140 dB noise contours which overlapped the SAC (17.77 + 103.23). This gave a total daily disturbance footprint of 3.72%. Further information on NRW's approach to assessing disturbance from piling for harbour porpoise can be obtained from our recent position statement (NRW, 2023b).		
Mon_054_274_010623	S42/S44	Email	In Section 1.9.4 Assessment of adverse effects in-combination, it is unclear whether all Tier 1 and Tier 2 projects have been considered for the assessment of incombination injury and disturbance from underwater sound generated during piling, and whether the contribution to disturbance from all projects was considered in the IPCoD modelling. NRW (A) recommend consideration of any Tier 1 and Tier 2 projects which overlap temporally, and if required the results should be updated. For assessing cumulative effects from piling, NRW (A) recommend the methodology used in the SNH Report 1081 (Carter et al.,2019) as an example.	Marine mammals of the Environmental Statement and the ISAA has been checked and aligned with this advice. All Tier 2 projects cannot be included in population modelling as numbers of species impacted are required which are not provided in the relevant scoping reports.	No
Mon_054_275_010623	S42/S44	Email	With reference to Section 1.9.4 Assessment of adverse effects in-combination, NRW (A)recommend using the results from IPCoD modelling when assessing impacts of disturbance on a population against conservation objectives related to the population maintaining itself on a long-term basis. These results could also inform and strengthen conclusions made for harbour porpoise. NRW (A) recommend that the ratio of the impacted versus unimpacted population over a set period of time (for example the first 6 years, based on the former Favourable Conservation Status (FCS) reporting period), and the full 25 year modelled period are provided. If, as a result of PTS or disturbance, a population shows a continued decline of >1% per year (versus a modelled unimpacted reference population over, for example, the first 6 years since the start of piling) then there is a high likelihood that a significant effect and AEOSI cannot be ruled out (NRW 2023a).	The position statement (NRW, 2023) has been reviewed and the assessment within Volume 2, Chapter 4: Marine mammals of the Environmental Statement and the ISAA has been updated where required. The results from IPCoD modelling have been presented when assessing impacts of disturbance on a population against conservation objectives. Impact are discussed after 6 years in addition to 25 years in the main text.	No
Mon_054_276_010623	S42/S44	Email	With reference to Section 1.9.4 Assessment of adverse effects in-combination, please see Paragraphs171and 242ofthe current document regarding assessment of injury and disturbance from vessel use and use of the term 'habituation'. Conclusions drawn may also need to be updated for the ISAA.	The language around habituation to disturbance (specific to the metric being measured) has been reconsidered throughout with further evidence provided where available (in Volume 2, Chapter 4: Marine mammals of the Environmental Statement and ISAA).	No
Mon_054_277_010623	S42/S44	Email	A conclusion of no adverse effect has been predicted in Section 1.9.4.377 Assessment of adverse effects in-combination, based on the assumption that the absence of prey will not impact marine mammals since they would also be displaced to potentially greater distances. However, this conclusion is dependent on recovery time of both receptors and no evidence regarding the length of time for fish species to return to the displaced area has been provided. This also differs from the conclusions made when assessing impacts on marine mammal disturbance from piling, where it was concluded that: "The impact (elevated underwater sound arising during piling) is predicted to be of regional spatial extent, medium term duration, intermittent and high reversibility (the impact itself occurs only during piling). Similarly, the effect of behavioural disturbance is reversible as receptors are expected to recover within hours/days." If recovery in marine mammals occurs within hours / days (and literature suggests it does for example Brandt et al.,2018), there may be an in-combination impact from loss of prey, and/or energetic costs of foraging in a different (potentially less preferred) area.	Further detail has been provided to justify the conclusions of the assessment throughout Volume 2, Chapter 4: Marine mammals of the Environmental Statement and this is carried to the HRA Stage 1 Screening report and ISAA where necessary.	No
Mon_054_288_010623	S42/S44	Email	Approach to LSE screening and hence sites taken through to HRA Stage 2 assessment. Further information on each of these issues is set out in the detailed comments below.	Noted, detailed response has been provided against the detailed comments.	No





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Mon_054_336_010623	S42/S44	Email	HRA Stage 1: Screening Report As has been discussed during the Offshore Ornithology EWGs (particularly EWG3 and EWG4 in November2022and February 2023 respectively), NRW (A)do not agree with the approach to LSE screening as set out in the HRA Screening Report. This is because LSE is a coarse screening filter, should be simple and if further evidence is brought in, then effectively this should be part of the appropriate assessment. This provides a transparent approach that can be followed through the Stage 2 ISAA. Therefore, NRW (A)would expect all sites where a qualifying feature has been recorded on the development site and where there is potential connectivity and an impact pathway and hence the potential to undermine the conservation objectives for the feature, to be screened in for LSE and carried through to the Stage 2 ISAA. Any additional work looking at, for example apportioning impacts, size of predicted collision or displacement impacts and assessments of predicted impacts against baseline mortality etc. should be included in the Stage 2 ISAA. NRW (A)advise Furness (2015) is used to identify potential connectivity in the non-breeding season.	The updated approach to the HRA Stage 1 Screening Report has been discussed and agreed through the evidence plan process.	No
Mon_054_337_010623	S42/S44	Email	Therefore, NRW (A)do not agree that sites and features should be screened out from LSE for the project alone based on predicted impacts equating to <1% of baseline mortality. Additionally, NRW (A)does not agree that sites are screened out of in-combination assessments where the predicted impact from the project alone is <0.5% of the baseline mortality of the site population, as while 0.5% of baseline mortality can be considered to be insignificant in the context of the population, this does not mean that this level of additional mortality should not be added to an assessment of in-combination impacts. Whilst these approaches may have been taken for the Round 4 Plan Level HRA, NRW (A)does not consider these assessment principles to be relevant at the project level, as the approach does not take into account the level of granularity required at the individual project level.	The updated approach to the HRA Stage 1 Screening Report has been discussed and agreed through the evidence plan process.	No
Mon_054_338_010623	S42/S44	Email	Based on the above, NRW (A) consider that LSE cannot be discounted for the following Welsh sites alone and in-combination: Liverpool Bay / Bae Lerpwl SPA –red-throated diver, common scoter (non-breeding displacement, habitat loss, indirect effects on prey) (note taken through to Stage 2 ISAA) •Aberdaron Coast and Bardsey Island / Glannau Aberdaron ac Ynys Enlli SPA – Manx shearwater (breeding displacement) •Grassholm SPA –gannet (breeding and non-breeding displacement, collision risk and combined displacement plus collision) (note taken through to Stage 2 ISAA for in-combination disturbance/displacement plus collision only) •Skomer, Skokholm and seas of Pembrokeshire / Sgomer, Sgogwm a moroedd Penfro SPA –Manx shearwater (breeding displacement), puffin, razorbill1, guillemot1 (non-breeding displacement); lesser black-backed gull, kittiwake1 (non-breeding collision) •Anglesey Terns / Morwenoliaid Ynys Môn SPA –roseate tern, common tern, Arctic tern, Sandwich tern (passage collision) •The Dee Estuary SPA / Ramsar –non-breeding waterbirds (passage collision). Sandwich tern, common tern (SPA only, passage collision). •Lavan Sands, Conway Bay / Traeth Lafan SPA –non-breeding waterbirds (passage collision) •Burry Inlet SPA / Ramsar –non-breeding waterbirds (passage collision) •Severn Estuary SPA / Ramsar –non-breeding waterbirds (passage collision)	The HRA Stage 1 Screening Report includes Welsh designated sites and Chapter 1.3: HRA Stage 2 ISAA Part 3 – SPA assessments presents all sites and species screened into stage 2 of the HRA assessment.	No





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Mon_054_339_010623	S42/S44	Email	NRW (A)understands that a revised approach to LSE screening for offshore ornithology will be taken for the final submission and that this approach is currently being reviewed and discussed through the EWG. NRW (A)will continue to input to these discussions.	The updated approach to the HRA Stage 1 Screening Report has been discussed and agreed through the evidence plan process.	No
Mon_054_340_010623	S42/S44	Email	HRA Stage 2: Information to Support Appropriate Assessment (ISAA) Report As noted for the LSE screening above, NRW (A)consider the additional sites and features listed above should also be screened in for LSE and taken through to the HRA Stage 2 ISAA. All work considering and explaining what may potentially happen in terms of apportioned impacts, size of predicted collision or displacement impacts and assessments of predicted impacts against baseline mortality etc. should be presented and considered in the Stage 2 ISAA and not at LSE screening. This may be based on quantitative or qualitative assessments depending on evidence available and assessments can be very short or require more detail. Where quantitative assessments are possible/used, NRW (A)suggest use of <1% of baseline mortality to rule out Adverse Effect on Site Integrity (AEOSI)from the project alone or in-combination in the ISAA integrity assessment, with further detailed assessment of any site/feature combinations where predicted mortality exceeds 1% of baseline mortality, for example, through PVA and consideration of impacts against conservation objectives.		No
Mon_054_341_010623	S42/S44	Email	Volume 6, Annex 10.5: Offshore ornithology apportioning assessment As noted above, NRW (A)consider that all work on apportionment of impacts should be undertaken as part of the HRA and not as part of LSE screening.	The updated approach to the HRA Stage 1 Screening Report has been discussed and agreed through the evidence plan process. This includes apportionment of impact at the LSE screening stage.	No
Mon_054_342_010623	S42/S44	Email	NRW (A)suggest that the list of SPA colonies for the different species presented in Appendix A of Annex 10.5(and the relevant species tables within this annex) are checked, as for the Welsh sites at least, there are some colonies listed as being SPAs, that are not designated as SPAs, for example: •Great Orme and Little Orme is incorrectly listed as being an SPA. However, Great Orme's Head is a designated SSSI with breeding guillemot, razorbill and kittiwake as features—as Mona is located within mean-maximum foraging range of all three of these species from this SSSI, a quantitative assessment of displacement for guillemot and razorbill and of collision for kittiwake should be undertaken for EIA within the ES, as impacts to SSSIs with connectivity to Mona have not been assessed anywhere within the PEIR. Little Orme's Head is also a designated SSSI with breeding cormorant as a feature, but we note that Mona is located outside of mean-maximum foraging range from this site for this species. •South Stack is not a designated SPAor SSSI in its own right, but is part of the Holy Island Coast SPA and SSSI. Both sites do not have seabird notified features. For Welsh designated sites, we suggest considering: Natural Resources Wales / Find protected areas of land and sea	Collision and displacement impacts have been apportioned to SSSIs sites with seabird features within the foraging ranges of the Mona Array Area. Results are presented in volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement. The impact of the increase in baseline in mortality on the common guillemot breeding population at Great Orme's Head SSSIs is investigated in Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report of the Environmental Statement. No other species was investigated due to apportioning highlighting the impact did not go above 1% hence no further assessment needed. The ES chapter assessed the impact of collision and displacement on features of SSSI sites connected to the Mona Array Area.	No
Mon_054_349_010623	S42/S44	Email	Habitats Regulations Assessment Stage 2 Information to Support Appropriate Assessment Report, Section 1.10 Assessment of Potential Adverse Effect on Integrity: Offshore ornithology –Liverpool Bay SPA Assessment of Impacts NRW (A)agree that an Environmental Management Plan (EMP) should be produced and secured through a condition in the marine licence(s). The EMP should include provisions for a vessel management plan (to include provisions for vessels and vessel transit corridors, measures to minimise disturbance to rafting seabirds etc.) and planning for accidental spills, address all potential contaminant releases and include key emergency details.	The Applicant notes your response.	No
Mon_054_350_010623	S42/S44	Email	As noted in the ISAA report the new conservation advice package is now available for the Liverpool Bay SPA and is available from: JP046 Edition 4 Liverpool Bay Bae Lerpwl SPA Conservation Advice Package.pdf Assessments need to be made	The updated conservation package for the Liverpool Bay SPA has been considered in the ISAA submitted with the application for consent.	No





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			against the new conservation objectives, hence NRW (A)welcome the commitment in the Stage 2 ISAA report that these will be fully reviewed and considered in the ISAA submitted with the application for consent.		
Mon_054_351_010623	S42/S44	Email	With reference to Disturbance and displacement from airborne sound and presence of vessels and infrastructure> Construction and decommissioning phase > Red-throated diver and common scoter, for the Mona project alone, NRW (A)advise that rather than taking a 4x4km area of the offshore export cable route to be impacted by displacement, the approach should take the area of sea occupied by a cable installation vessel plus a 2km buffer all around the vessel. This area should then be multiplied by the worst-case scenario number of cable laying vessels that may be present within the cable corridor area at any one time to give the total area that may be affected by displacement due to the presence of the vessel(s) (as has been done by other recent projects, for example Awel y Môr, Norfolk Boreas). NRW (A)then advise that 100% displacement across this area is assumed and as mortality resulting from cable laying will be temporary, we recommend a range of 0.5-1% mortality is considered.	using 2 km buffer around each vessel x number of vessels - assuming 100% displacement and 0.5-1% mortality. With reference to disturbance and displacement, the assessment for red-throated diver and common scoter is presented in Volume 2, Chapter 5: Offshore Ornithology ES.	No
Mon_054_352_010623	S42/S44	Email	NRW (A) welcome the assessment of in-combination impacts from the cable laying activities for Mona with those of Awel y Môr combined with impacts from the operational wind farms located within the SPA. Any updated figures for impacts from Mona alone should be taken through to the in-combination assessment.	The Applicant notes your response	No
Mon_054_353_010623	S42/S44	Email	As noted during Offshore Ornithology EWG4, NRW (A)suggest consideration could be given to timing restrictions on Mona's cable laying through the SPA so that the cable is not laid during key times for the red-throated diver and common scoter features (i.e. avoid November-March).	Considerations are being given to timing restrictions using latest findings from digital aerial surveys carried out in the SPA (HiDef Aerial Surveying Limited, 2023).	No
Mon_054_354_010623	S42/S44	Email	With reference to Disturbance and displacement from airborne sound and presence of vessels and infrastructure > Operations and Maintenance Phase(O&M)> Red-throated diver and common scoter: In addition to consideration of disturbance and displacement from presence of vessels for cable repairs and maintenance from Mona alone, assessment should also be made of disturbance and displacement of these qualifying features on vessel movements associated with O&M of the array itself. As the port location is currently unknown there is the potential that O&M vessels may transit through the Liverpool Bay SPA enroute from port to the array and vice versa. This should also be considered in-combination.	The impact of vessel movement associated with operation and maintenance for project alone and in-combination is presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_054_355_010623	S42/S44	Email	Habitats Regulations Assessment Stage 2 Information to Support Appropriate Assessment Report, Section 1.10.4 Assessment of adverse impacts incombination, Grassholm SPA Assessment of Impacts. NRW (A)note that Grassholm SPA has only been taken through to the Stage 2 ISAA assessment for in-combination assessment of impacts of collision plus displacement for gannet. As noted above, as the Mona project is located within foraging range of gannets from Grassholm SPA, gannets have been recorded on the Mona survey area and gannets are considered to be sensitive to displacement and collision impacts. NRW (A)consider that there is connectivity and hence this site and feature should be screened in as an LSE cannot be ruled out, and taken through to the HRA Stage 2 for the project alone. All work considering apportioned impacts, size of predicted collision or displacement impacts, and assessments of predicted impacts against baseline mortality etc. should be presented and considered in the Stage 2 ISAA and not at LSE screening.	The updated approach to the HRA Stage 1 Screening Report has been discussed and agreed through the evidence plan process. This includes apportionment of impacts at the LSE screening stage. The Grassholm SPA has been screened into the HRA Stage 2 ISAA- Part 3 for northern gannets for displacement, collision risk and in-combination effects.	No
Mon_054_356_010623	S42/S44	Email	Please note our comments on the apportionment of impacts in Section 1.6.2.5.1 of the current document. With reference to In-combination disturbance and displacement from airborne sound, presence of vessels and infrastructure and collision risk combined impacts, Paragraph 10.10.4.87states: "During all phases of the Mona Offshore Wind Project,	All relevant project within the non-breeding season BDMPS 'UK Western Waters' of northern gannet were included in the CEA presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No





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			potential displacement and collision impacts are attributed to Grassholm SPA from the Mona Offshore Wind Project. The in-combination assessment therefore combines these impacts, alongside impacts from other plans and projects within mean-maximum foraging range + 1SD (Woodward et al.,2019) attributed to the Grassholm SPA. "Whilst inclusion in the in-combination assessment of impacts from other plans and projects within foraging range is acceptable for the breeding season, annual impacts need to be considered and hence non-breeding season(s) impacts from a wider range of projects, i.e. all those located within the relevant non-breeding season BDMPS in Furness (2015) (in this case for gannet is the UK western waters) should be included in Table 1.266Grassholm SPA predicted annual mortality rate of breeding adult norther gannet resulting from collision risk, disturbance and displacement from projects considered in-combination during the operation and maintenance phase.		
Mon_054_357_010623	S42/S44	Email	With regard to the level of predicted impact included in Table 1.266for the Mona project, consideration should be given to our comments on the apportionment of impacts to colonies in Section 1.6.2.5.1 of the current document, and the level of impact amended accordingly.	Consideration of comments on the apportioning assessment are detailed and addressed within Volume 6, Annex 5.5: Offshore Ornithology Apportioning Technical Report.	No
Mon_054_358_010623	S42/S44	Email	Consideration should also be given to our comments in Section 1.6.2.2.3 of the current document, regarding the numbers and other plans and projects to include within the in-combination assessment and the total in-combination level of impact amended accordingly.	Projects where effects were not historically assessed were included in the CEA presented in Volume 2, Chapter 5: Offshore Ornithology and the incombination assessment in the ISAA and treated as unavailable. A more detailed qualitative assessment has been added to further assess the historic offshore wind projects. This has been discussed with the EWG and the Applicant has provided a detailed response via a technical note.	No
Mon_054_359_010623	S42/S44	Email	Reference should be given to the year and source of the Grassholm gannet colony size count given in Paragraph 1.10.4.91–it is assumed that this is based on the 2015 count of 36,011 Apparently Occupied Nests (AONs), which equals 72,022 breeding adults. Reference should also be given to the source of the background mortality of 0.081 given in Paragraph 1.10.4.91–it is assumed this is calculated from the adult gannet survival rate of 0.919 in Horswill & Robinson (2015).	Reference (including year) to Grassholm northern gannet colony count is given in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement. Background mortality is calculated form Horswill & Robinson (2015) and presented in Volume 6, Annex 5.2: Offshore ornithology displacement technical report of the Environmental Statement.	No
Mon_054_448_010623	S42/S44	Email	It should be noted in Section 1.8.2.12, from our own tagging and trapping programmes, downstream migrating Salmon juveniles (Smolts) have been found to move from March –May.	The Applicant notes your response	No
Mon_054_449_010623	S42/S44	Email	Clarification is sought in Table 1.51Measures adopted as part of the project which are relevant to the assessment of adverse effect on European sites designated for Annex II diadromous fish features from underwater sound, on whether there will be continuous piling of 24hrs+, and if so, mitigation should be put in place that would allow a window of undisturbed movement for migrating fish.	The maximum design scenario assessed is based upon up to 20.5h of active piling per day, thus allowing a window for movement by migratory fish. Further, site specific underwater sound modelling demonstrates that piling will not lead to barrier effects between the Mona Array Area and the coast of the UK and therefore migration to/from relevant freshwater habitats (including Special Areas of Conservation) will not be adversely affected	
Mon_060_080_010623	S42	Email	Habitats Regulations Assessment Stage 2 Information to Support an Appropriate Assessment Note: In line with JNCCs offshore remit, our comments focus on harbour porpoise SACs and we defer to NRW regarding sites within Welsh territorial waters i.e. those for bottlenose dolphin and seals.	Comment noted	No
Mon_060_081_010623	S42	Email	1.5 Summary of LSE screening conclusions1.5.3.6, LSE in-combination for Annex II marine mammals "A precautionary approach to selection of relevant sites for Annex II marine mammals was adopted in the HRA Stage 1 Screening Report. As marine mammals are highly mobile animals with the potential to forage over wide areas, all European sites for marine mammal features with a range that overlaps with the Mona Offshore Wind Project were considered. "This is not the advised approach to screening in sites for HRA. To screen in sites, please use the relevant Management Unit (MU). Please change the approach and alter all relevant documents accordingly to use the correct screening process.	Sites to assess for a potential LSE as a result of the Mona Offshore Wind Project. The relevant foraging ranges of Annex II marine mammal features have also been presented and considered, to ensure all relevant European Sites have been identified.	No





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Mon_060_082_010623	S42	Email	1.9 Assessment of potential Adverse Effect on integrity: Annex II marine mammals Figure 1.11:Location of European Sites designated for Annex II marine mammal features for which an Appropriate Assessment is required. As noted in the comments on "Volume 2, Chapter 9, Marine Mammals", it would be useful to see this or a similar map of the Mona Array Area and Mona Offshore Cable Corridor with nearby protected areas of interest in Chapter 9, for reference.	A figure showing the European Sites considered in the HRA and Mona Offshore Wind Project infrastructure has been added to Volume 2, Chapter 4: Marine mammals of the Environmental Statement	No
Mon_060_083_010623	S42	Email	Injury and disturbance from underwater sound generated during piling, page 147 Please refer to previous comments on these sections of the impact assessment, which will also apply here as it supports the HRA conclusions.	Comments on Volume 2, Chapter 4: Marine mammals of the Environmental Statement have been reviewed and text has been updated where required.	No
Mon_060_084_010623	S42	Email	Table 1.100, Maximum design scenario considered for the assessment of potential impacts on marine mammals from injury and disturbance from underwater sound generated during piling during the construction phase. In the construction phase the table notes that there will be "up to 68 wind turbines [monopiles]", whereas elsewhere it is quoted as up to 70. Please clarify if this is correct and amend if needed.	Monopiles have been removed from the Project Design Envelope for the final Application. All numbers for jacket foundations have been checked for consistency.	Yes
Mon_060_085_010623	S42	Email	Table 101:Measures adopted as part of the Mona Offshore Wind Project relevant to the assessment of adverse effect on European sites designated for Annex II marine mammal features from underwater sound during the construction phase. As previously commented, noise abatement technology should be listed as a potential measure to reduce the impact of underwater noise. This is especially important given the impact ranges mentioned in Volume 2, Chapter 9 and in the Underwater sound technical report and will help support a conclusion of no adverse effect on the North Anglesey Marine SAC.		Yes
Mon_060_086_010623	S42	Email	Injury and disturbance from underwater sound generation from unexploded ordnance (UXO) detonation, page 165Please refer to previous comments on UXO clearance. We do not believe there is sufficient information available at this stage to conclude no adverse effect on the North Anglesey Marine SAC from UXO clearance.	As per response to comments on the Chapter, we have revisited the assessment on UXO and updated accordingly. Updates have also been carried forward to the HRA.	No
Mon_060_121_010623	S42	Email	HRA Screening Report, Screening Matrices and Integrity Matrices. There has been discussion throughout the EWG meetings that we do not agree with the approach to LSE screening as outlined in the PEIR. LSE is a coarse screening filter, should be simple and if further evidence is bought in, then effectively this should be part of the appropriate assessment. This provides a transparent approach that can be followed through the RIAA. Therefore, we would expect all sites where a qualifying feature has been recorded on the development site and where there is potential connectivity (e.g. within foraging range) and a potential impact pathway (e.g. displacement or collision) and hence the potential to undermine the conservation objectives for the feature to be carried through to the AA phase. Any additional work looking at e.g. apportioning impacts and assessments of predicted impacts against baseline mortality etc. should be included in the AA. Therefore, we do not agree with the SPAs and features screened out of from LSE. We understand that a revised approach to LSE screening for offshore ornithology will be taken for the final submission and that this approach is currently being reviewed and discussed through the EWG. We will continue to input to these discussions.	As discussed through the evidence plan process, a 'two step' integrity test has been carried out in the ISAA. This involves a high level initial step 1 assessment to determine those SPAs with low risk of Adverse Effect on Integrity (AEOI), and a more detailed step 2 assessment for those SPAs where there is greater risk of an AEOI. This approach is described and presented in the HRA Stage 2 ISAA- Part 3.	No





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Mon_060_122_010623	S42	Email	1.3.7.10Why is Skomer and Skokholm and the Seas off Pembrokeshire SPA classed as a marine SPA and not included in apportioning? The SPA contains breeding seabird colonies; therefore, a foraging range should be applied to the breeding colonies, and apportioning of impacts should be carried out. This appears to have been done for kittiwake within the Volume 6: Annex 10.5 Offshore ornithology apportioning assessment, but not for lesser black-backed gull, which is within foraging range of the Mona OWF.	Apportioning of relevant qualifying species at the Seas off Pembrokeshire SPA is presented in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report of the Environmental Statement.	No
Mon_060_126_010623	S42	Email	Habitats Regulations Assessment Stage 2 Information to Support an Appropriate Assessment. As noted for the HRA screening document, we do not agree with the approach to LSE screening and disagree with the SPAs and features taken through to the Appropriate Assessment stage. We understand that a revised approach to LSE screening for offshore ornithology will be taken for the final submission and that this approach is currently being reviewed and discussed through the EWG. We will continue to input to these discussions.	As discussed through the evidence plan process, a 'two step' integrity test has been carried out in the ISAA. This will involve a high level initial step 1 assessment to determine those SPAs with low risk of Adverse Effect on Integrity (AEOI), and a more detailed step 2 assessment for those SPAs where there is greater risk of an AEOI. This approach is described and presented in the HRA Stage 2 ISAA- Part 3.	No
Mon_060_127_010623	S42	Email	Table 1.3: A summary of all European sites for which the potential for LSE could not be discounted at the Stage 1 screening stage, and for which Appropriate Assessment is required. & Table 1.23: Conclusions against the conservation objectives of the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC for long-term habitat loss during the decommissioning phase. Given the comments made regarding Volume 6: Annex 10.5 Offshore ornithology apportioning assessment and Volume 6: Annex 10.3 Offshore ornithology non-migratory seabird collision risk assessment, we cannot agree with the results within these tables.	The approach to the potential for LSE has been revised and agreed with the offshore ornithology EWG since PEIR submission to address concerns, and all European Sites connected to the Mona Offshore Wind Project have been listed in Chapter 1.4: HRA Stage 1 screening report.	No
Mon_060_128_010623	S42	Email	1.10.2Baseline Information Given the comments made regarding Volume 6: Annex 10.5 Offshore ornithology apportioning assessment and Volume 6: Annex 10.3 Offshore ornithology non-migratory seabird collision risk assessment, we cannot agree that all relevant SPAs have been included here.	All SPAs with seabird features within the mean-max foraging + 1 SD of the Mona Array Area have been considered in the assessment.	No
Mon_060_129_010623	S42	Email	1.10.2.37Note that new conservation objectives for the Irish Seafront SPA have recently been published and are available here: hiips://jncc.gov.uk/our-work/irish-sea-front-spa/#conservation-adviceand should be referred to in the next iteration of this document.	Updated conservation objectives for the Irish Sea Front SPA have been considered in HRA Stage 2 ISAA Part 3 – SPA assessments.	No
Mon_060_130_010623	S42	Email	1.10.3.46,1.10.3.47,1.10.4.15 & 1.10.4.16This assessment of red-throated diver disturbance by construction vessels within the cable corridor uses an example of a 4km by 4km buffer around a vessel. This therefore gives a number of birds displaced and number of mortalities per vessel. However, as stated in table 1.235 there are predicted to be up to 91 vessels present at any one time. Therefore, the assessment, in terms of the conservation objectives regarding both population size and distribution, should be scaled to this total vessel presence. We advise that an assessment of red-throated diver vessel disturbance is undertaken by using a 2km buffer around each vessel such that the total impacted area also included the size of vessel. We are content with the displacement and mortality rates applied. We advise that a restriction to vessel works during the wintering period is considered to prevent disturbance to red-throated diver.	We have followed the approach taken by Awel y Môr and Norfolk Boreas by using 2 km buffer around each vessel x number of vessels - assuming 100% displacement and 0.5-1% mortality. With reference to disturbance and displacement, the assessment for red-throated diver and common scoter is presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_060_131_010623	S42	Email	1.10.3.56, 1.10.3.57,1.10.4.22 & 1.10.4.23. This assessment of common scoter disturbance by construction vessels within the cable corridor uses an example of a 4km by 4km buffer around a vessel. This therefore gives a number of birds displaced and number of mortalities per vessel. However, as stated in table 1.235 there are predicted to be up to 91 vessels present at any one time. Therefore, the assessment, in terms of the conservation objectives regarding both population size and distribution, should be scaled to this total vessel presence. We advise that an assessment of common scoter vessel disturbance is undertaken by using a 2.5km buffer around each vessel (Fliessbach et al., 2019) such that the total impacted	We have followed the approach taken by Awel y Môr and Norfolk Boreas Offshore Windfarms by using 2.5 km buffer around each vessel x number of vessels - assuming 100% displacement and 0.5-1% mortality. With reference to disturbance and displacement, the assessment for red-throated diver and common scoter is presented in Volume 2, Chapter 5: Offshore Ornithology Environmental Statement.	No



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			area also included the size of vessel. We are content with the displacement and mortality rates applied. We advise that a restriction to vessel works during the wintering period is considered to prevent disturbance to common scoter.		
Mon_060_132_010623	S42	Email	Table 1.237: Conclusions against the conservation objectives of the Liverpool Bay/Bae Lerpwl SPA for disturbance and displacement from airborne sound and presence of vessels and infrastructure during the construction and decommissioning phase. With regard to the conservation objective to maintain or restore the distribution of the qualifying features within the site, the effect due to vessel presence is due to be temporary, however will persist over up to four years, which in respect to the lifespan of red-throated diver and common scoter, with typical lifespans of 9 years and 6 years respectively, is a significant proportion of their lifespan. Given this and the comments above, we cannot agree with the results in this table. We advise that a restriction to vessel works during the wintering period is considered to prevent disturbance to red-throated diver.	Volume 2, Chapter 5: Offshore ornithology chapter of the Environmental Statement sets out measures adopted to reduce impacts to offshore ornithology. The Applicant has committed to no offshore export cable laying works within the Liverpool Bay SPA from 1st November to 31st March, following this feedback and discussions in the offshore ornithology EWGs.	No
Mon_060_133_010623	S42	Email	1.10.3.73Please clarify why vessel disturbance occurring in and around the export cable for red-throated diver results in "lower disturbance during the operations and maintenance phase than during the construction phase". Fewer vessels may be present, and the displacement rate remains the same, however why is the mortality rate lower? We advise that a restriction to vessel works during the wintering period is considered to prevent disturbance to red-throated diver.	Volume 2, Chapter 5: Offshore ornithology chapter of the Environmental Statement sets out measures adopted to reduce impacts to offshore ornithology. The Applicant has committed to no offshore export cable laying works within the Liverpool Bay SPA from 1st November to 31st March, following this feedback and discussions in the offshore ornithology EWGs.	Yes
Mon_060_134_010623	S42	Email	1.10.3.75 & 1.10.3.76 & 1.10.4.35This assessment of red-throated diver disturbance by operations and maintenance vessels within the cable corridor again gives a number of birds displaced and number of mortalities per vessel. Table 1.235 lists up to 2,351 operations and maintenance vessel movements (return trips) each year with up to a total of 21 operations and maintenance vessels on site at any one time. It is not mentioned how many of these will transit Liverpool Bay SPA, and how many (if any) of these vessel movements are for the maintenance of the export cable. The assessment, in terms of the conservation objectives regarding both population size and distribution, should be scaled to this total vessel presence including vessels for export cable maintenance and transiting the SPA to reach the wind farm. We advise that a restriction to vessel works during the wintering period is considered to prevent disturbance to red-throated diver.	Clarifications have been added to Volume 2, Chapter 5: Offshore ornithology chapter of the Environmental Statement since PEIR. The chapter sets out measures adopted to reduce impacts to offshore ornithology. The Applicant has committed to no offshore export cable laying works within the Liverpool Bay SPA from 1st November to 31st March, following this feedback and discussions in the offshore ornithology EWGs.	Yes
Mon_060_135_010623	S42	Email	1.10.3.86Please clarify why vessel disturbance occurring in and around the export cable for common scoter results in "lower disturbance during the operations and maintenance phase than during the construction phase". Fewer vessels may be present, and the displacement rate remains the same, however why is the mortality rate lower? We advise that a restriction to vessel works during the wintering period is considered to prevent disturbance to common scoter.	Clarifications have been added to Volume 2, Chapter 5: Offshore ornithology chapter of the Environmental Statement since PEIR. The chapter sets out measures adopted to reduce impacts to offshore ornithology. The Applicant has committed to no offshore export cable laying works within the Liverpool Bay SPA from 1st November to 31st March, following this feedback and discussions in the offshore ornithology EWGs.	Yes
Mon_060_136_010623	S42	Email	1.10.3.87,1.10.3.88 & 1.10.4.41 This assessment of common scoter disturbance by operations and maintenance vessels within the cable corridor again gives a number of birds displaced and number of mortalities per vessel. Table 1.235 lists up to 2,351 operations and maintenance vessel movements (return trips) each year with up to a total of 21 operations and maintenance vessels on site at any one time. It is not mentioned how many of these will transit Liverpool Bay SPA, and how many (if any) of these vessel movements are for the maintenance of the export cable. The assessment, in terms of the conservation objectives regarding both population size and distribution, should be scaled to this total vessel presence including vessels for export cable maintenance and transiting the SPA to reach the wind farm. We advise that a restriction to vessel works during the wintering period is considered to prevent disturbance to common scoter.	Clarifications have been added to Volume 2, Chapter 5: Offshore ornithology chapter of the Environmental Statement since PEIR. The chapter sets out measures adopted to reduce impacts to offshore ornithology. The Applicant has committed to no offshore export cable laying works within the Liverpool Bay SPA from 1st November to 31st March, following this feedback and discussions in the offshore ornithology EWGs.	Yes
Mon_060_137_010623	S42	Email	Table 1.238: Conclusions against the conservation objectives of the Liverpool Bay/Bae Lerpwl SPA for disturbance and displacement from airborne sound and	Clarifications have been added to Volume 2, Chapter 5: Offshore ornithology chapter of the Environmental Statement since PEIR. The chapter sets out	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			presence of vessels and infrastructure during the operations and maintenance phase. &Table 1.251: Conclusions against the conservation objectives of the Liverpool Bay/Bae Lerpwl SPA for in-combination disturbance and displacement from airborne sound, and presence of vessels and infrastructure impacts during the construction phase. Given the above comments with regard to the vessel disturbance assessment during operation and maintenance, we cannot agree with the results in this table. We advise that a restriction to vessel works during the wintering period is considered to prevent disturbance to red-throated diver and common scoter.	measures adopted to reduce impacts to offshore ornithology. The Applicant has committed to no offshore export cable laying works within the Liverpool Bay SPA from 1st November to 31st March, following this feedback and discussions in the offshore ornithology EWGs.	
Mon_060_138_010623	S42	Email	Table 1.242: Conclusions against the conservation objectives of the Irish Sea Front SPA for changes in prey availability during the construction phase. Note that new conservation objectives for the Irish Seafront SPA have recently been published and are available here: hiips://jncc.gov.uk/our-work/irish-sea-front-spa/#conservation-adviceand should be referred to in the next iteration of this document.	Updated conservation objectives for the Irish Sea Front SPA have been considered in HRA Stage 2 ISAA Part 3 – SPA assessments.	No
Mon_060_139_010623	S42	Email	1.10.4.2It is stated that schemes other than offshore wind farms and tidal energy projects are considered to be unlikely to impact in-combination, however vessel disturbance by other activities may act in-combination, for instance vessel activities associated with aggregate activities, which should be accounted for in an incombination assessment.	The impact of vessel movement associated with operation and maintenance for project alone and in-combination is presented in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement.	No
Mon_060_140_010623	S42	Email	1.10.4.8 & 1.10.4.10Given the comments made regarding Volume 6: Annex 10.5 Offshore ornithology apportioning assessment and Volume 6: Annex 10.3 Offshore ornithology non-migratory seabird collision risk assessment, we cannot agree that all relevant SPAs and features have been included here.	All SPAs with seabird features within the mean-max foraging + 1 SD of the Mona Array Area have been considered in the assessment.	No
Mon_066_057_020623	S42	Email	Finally, Natural England has concerns with the approach to HRA methodology and provision of updates out with the PEIR submission. We suggest the project continues to work through the EWG to agree the approach.	The updated approach to HRA methodology has been approved through evidence plan process.	No
Mon_076_003_030623	S44	Email	Please can you confirm whether there will be recompense for the following during the construction work: (a) Disruption caused to quality of life and quiet enjoyment. (b) III health (c) Financial loss I look forward to hearing from you. Kind regards,	In the event that substantiated and tangible losses are incurred as a result of the project, they will be compensated for under the compensation code upon the implementation of the DCO.	No
Mon_088_011_040623	S42	Email	A draft Information to Support Appropriate Assessment (ISAA); more commonly known as a Report to Inform Appropriate Assessment (RiAA), is provided alongside the PIER but a project-level Habitats Regulation Assessment (HRA)7 has not. It is accepted that a plan level HRA was conducted by The Crown Estate (TCE) for the Leasing Round 4 Plan, and that a Project Level HRA should be conducted by the developer.	The Applicant has provided a HRA Stage 1 Screening Report (Document Reference E1.4) and HRA Stage 2 ISAA part 1 (intro and background), part 2 (SAC assessments) and part 3 (SPA assessments) (Document References E1.1 - E1.3) for the Mona Offshore Wind Project with the DCO Application, which fulfils the requirements of the Habitats Regulations and provides the relevant information for the Competent Authority to undertake the Appropriate Assessment.	
Mon_089_004_020623	S42	Email	Any interactions and impact should be considered long-term and the various project stages of construction, operation, maintenance and decommissioning of the Isle of Man Offshore Windfarm should be considered by you. It is important to ensure that all environmental impacts of your project are properly and fully assessed including any potential cumulative or in combination effects with the Isle of Man Offshore Windfarm. We refer you to our response to the Morgan Offshore Wind Project which outlines our concerns as to the approach taken to the in-combination and	The Mooir Vannin Offshore Wind Farm Scoping Report was published in October 2023. Accordingly, the Mooir Vannin Offshore Wind Farm is considered in the cumulative effects assessment as a Tier 2 project, where relevant.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			cumulative assessments to date. We would also expect consideration in your Report to Inform Appropriate Assessment.		





D.25.31 Draft Development Consent Order (including deemed marine licences) table of responses



Table D.25. 31: Draft Development Consent Order (including deemed marine licences) table of responses

Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_043_003_290523	S42	Email	SPEN have requested the following: - ensure that where there are impacts these can be managed in an appropriate way through agreed protective provisions	It has been identified that SP Energy Networks assets are located within the order limits of the Mona Offshore Wind Project. The Applicant has included protective provisions for the protection of SP Energy Networks in the draft DCO and the Applicant remains in ongoing dialogue with SP Energy Networks to ensure its assets are correctly identified and, where necessary, appropriate mitigation is put in place.	Yes
Mon_043_004_290523	S42	Email	SPEN have requested the following: - ensure the agreed measures are made clear to contractors working on site through required method statements	It has been identified that SP Energy Networks assets are located within the order limits of the Mona Offshore Wind Project. The Applicant has included protective provisions for the protection of SP Energy Networks in the draft DCO and the Applicant remains in ongoing dialogue with SP Energy Networks to ensure its assets are correctly identified and, where necessary, appropriate mitigation is put in place.	Yes
Mon_043_005_290523	S42/S44	Email	SPEN have requested the following: - ensure that where existing land rights are interfered with then these are replaced with new rights which retain SPEN's existing rights or new rights	It has been identified that SP Energy Networks assets are located within the order limits of the Mona Offshore Wind Project. The Applicant has included protective provisions for the protection of SP Energy Networks in the draft DCO and the Applicant remains in ongoing dialogue with SP Energy Networks to ensure its assets are correctly identified and, where necessary, appropriate mitigation is put in place.	Yes
Mon_043_006_290523	S42/S44	Email	SP Energy Networks will require all SPM land rights affected by the scheme that need to be amended to be agreed in full agreement with SPM. Reference is made to the Book of Reference where SP Manweb interests are included. Reviewing the BoR and confirming existing and proposed rights is likely to be an expansive task and the applicant is asked to engage with SPM regarding a timetable and cost undertakings to support working with SP Energy Networks in this regard.	It has been identified that SP Energy Networks assets are located within the order limits of the Mona Offshore Wind Project. The Applicant has included protective provisions for the protection of SP Energy Networks in the draft DCO and the Applicant remains in ongoing dialogue with SP Energy Networks to ensure its assets are correctly identified and, where necessary, appropriate mitigation is put in place.	Yes
Mon_047_004_300523	S42/S44	Email	Where the Promoter intends to acquire land, extinguish rights, or interfere with or work within close proximity to any of NGET's apparatus and interests, this will require appropriate protection and further discussion on the impact to its apparatus and rights.	The Applicant has included protective provisions for the protection of National Grid in the draft DCO.	No
Mon_047_009_300523	S42/S44	Email	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	The Applicant has included protective provisions for the protection of National Grid in the draft DCO.	No
Mon_047_010_300523	S42/S44	Email	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).	The location, orientation and layout of the onshore substation has been purposefully sited and has reduced the height and scale of the onshore substation buildings, as well as micro-siting the substation platform to ensure clearance distances from overhead lines are adhered to in line with EN 43-8. For details of the site selection process for the siting and orientation please see Chapter 1, Volume 4: Site Selection and Consideration of Alternative. The design of the substation is outlined in the Design Principles Document (Document reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline LEMP (Document J22).	Yes
Mon_047_011_300523	S42/S44	Email	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.	in the draft DCO. The Applicant has included protective provisions for the protection of National Grid in the draft DCO.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_047_013_300523 S42/S44	S42/S44	Email	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.	The location, orientation and layout of the onshore substation has been purposefully sited and has reduced the height and scale of the onshore substation buildings, as well as micro-siting the substation platform to ensure clearance distances from overhead lines are adhered to in line with EN 43-8. For details of the site selection process for the siting and orientation please see Chapter 1, Volume 4: Site Selection and Consideration of Alternative. The design of the substation is outlined in the Design Principles Document (Document reference J3). An Illustrative Landscape and Ecology Strategy has been prepared and is included in the Outline LEMP (Document J22).	Yes
				The Applicant has included protective provisions for the protection of National Grid in the draft DCO.	
Mon_047_015_300523	S42/S44	potential to any existing the existing	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	The Illustrative Landscape and Ecology Strategy Plan excludes woodland or tree planting, beneath the overhead lines. Trees that are already in a 40 m wide exclusion zone will be retained. Hedgerows that link the two areas of mature/Ancient Woodland will be retained/restored/created. Wildflower meadows/species rich grassland will be created.	Yes
				The Applicant has included protective provisions for the protection of National Grid in the draft DCO.	
Mon_047_016_300523	S42/S44	Email	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	The Applicant has included protective provisions for the protection of National Grid in the draft DCO.	Yes
Mon_047_017_300523	S42/S44	Email	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	The applicant will open negotiations on protective provisions with the affected party. The Applicant has included protective provisions for the protection of National Grid in the draft DCO.	No
Mon_050_009_310523	S42	Email	Cable Routes Export cable routes, cable burial protection index and cable protections are issues that are yet to be fully developed. However due cognisance needs to address cable burial and protection, particularly close to shore where impacts on navigable water depth may become significant. Any consented cable protection works must ensure existing and future safe navigation is not compromised. The MCA would accept a maximum of 5% reduction in surrounding depth referenced to Chart Datum. Where burial depths are not achieved, consultation will need to take place with MCA regarding the locations, impact and potential risk mitigation measures.	The Draft DCO submitted alongside the application secures a condition not to exceed 5% reduction in navigable depth without permission from NRW in consultation with MCA	Yes
Mon_050_012_310523	S42	Email	Draft Development Consent Order (DCO) The draft DCO has been reviewed and we have the following comments to Schedule 14, Part 2: Condition 14(8) must include Trinity House	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_050_013_310523	S42	Email	Condition 14(11) should be amended to: In case of damage to, or destruction or decay of, the authorised project or any part thereof, excluding the exposure of cables and faults, the undertaker must as soon as reasonably practicable and no later than 24 hours following the undertaker becoming aware of any such damage, destruction or decay, notify NRW, MCA, Trinity House, the Kingfisher Information Service of Seafish and UKHO.	Condition 13 of the dML has been updated to reflect this comment.	No



Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_050_014_310523	S42	Email	Condition 14(12) should be amended to :In case of buried cables becoming exposed on or above the seabed, the undertaker must within three days following identification of a cable exposure, notify mariners, regional fisheries contacts and the Kingfisher Information Service of Seafish of the location and extent of exposure. Copies of all notices must be provided to the MMO, MCA, Trinity House, and the UKHO within 5 days.	Condition 13 of the dML has been updated to reflect this comment.	No
Mon_050_015_310523	S42	Email	Condition 26 must include MCA, Trinity House and UKHO.	Condition 26 of the dML has been updated to reflect this comment.	No
Mon_054_535_010623	S42/S44	Email	NRW Marine Licensing Team: Regulatory Comments The Planning Act 2008 provides the ability to include or 'deem' a Marine Licence within the Development Consent Order (DCO) granted by the Secretary of State for licensable activities that are wholly within Welsh Offshore waters (beyond 12nm from the coast). NRW agrees with the principle that a deemed Marine Licence can be included in the DCO for the licensable activities that are wholly within Welsh Offshore Waters.	NRW's comment is noted and the Applicant welcomes this confirmation.	No
Mon_054_538_010623	S42/S44	Email	NRW exercise the role of the Licensing Authority under the Marine and Coastal Access Act (2009) on behalf of Welsh Government. However the enforcement provisions have not been delegated to NRW and remains with Welsh Government. Chapter 2 Policy and Legislation Section 2.3.3.2of the PEIR incorrectly refers to NRW as the Enforcement body for Marine Licences in Wales. Similarly, Welsh Government should be referred to as the Enforcement Authority within the draft deemed Marine Licence.	Noted and this has been updated in Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement. The Welsh Government has been referred to as the enforcing authority within the dML and reference to marine enforcement officers included as appropriate.	No
Mon_054_539_010623	S42/S44	Email	NRW MLT note the applicant intends to apply for 3 Marine Licences; one deemed Marine Licence in respect of activities wholly in Welsh Offshore Waters (Schedule 14 of the draft DCO), one in relation to activities in English Waters (Schedule 15 of the draft DCO) and, as detailed above, a separate marine licence application will be submitted to NRW MLT in relation to activities in inshore Welsh waters (within 12nm). NRW MLT note that the parameters provided within both deemed Marine Licences cover the project as a whole (for example Schedule 14 section 3 and 11), rather than detailing specific parameters for each separate Licence. No description of parameters for the licensable activities that will fall in the non-deemed marine licence has been provided. NRW MLT would request that specific parameters are provided for each proposed licence. Where this cannot be achieved at this stage, justification should be provided (for example, currently 107 turbines and 4 offshore substation platforms are included in both deemed Marine Licences, in English Waters and Welsh Waters).	offshore works which are to be included within the deemed marine licence are included in Schedule 14, Part 2, Table 5.	No
Mon_054_540_010623	S42/S44	Email	Each chapter of the PEIR has identified mitigation and monitoring that the applicant considered necessary for the project. NRW MLT would advise that a document is presented that compiles all the mitigation and monitoring proposed within the ES, and identifies where it is proposed these mitigation and monitoring actions are secured, identifying the relevant condition(s) of all the deemed Marine Licences where relevant. This document should also identify which monitoring and mitigation the applicant considers will be relevant to the separate non-deemed Marine Licence	Please see the Mitigation and Monitoring Schedule (Document Reference J10).	No
Mon_054_541_010623	S42/S44	Email	NRW MLT note that no co-ordinates have been provided within the schedules or the DCO in relation to the area of works. NRW MLT recognise that reference has been given in Schedule 14 section (5) to work plans, however NRW MLT consider that the co-ordinates bounding the areas of works covered by each marine licence is required.	Coordinates for the whole of the offshore works are included in Schedule 1, Part 1, Table 1 of the draft DCO. Coordinates for the elements of the offshore works which are to be included within the deemed marine licence are included in Schedule 14, Part 2, Table 3 of the draft DCO.	
Mon_054_542_010623	S42/S44	Email	NRW MLT note that no expiry date has been given to the licence and that there is no requirement that the decommissioning takes place prior to a	As is standard for DCOs there is no end date specified in the draft Order. As a result the dML will remain in force until the authorised scheme has been	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			specific date. NRW MLT note that within Chapter 1 Introduction, Section 1.4.1.2, reference is made to the 60 years lease from the Crown Estate in connection with the project and also a 35-year design life of the project. Clarification is required regarding the proposed duration of the project, and whether the assessment has been carried out in light of that period. Additionally, clarification is required whether the deemed Marine Licence includes activities associated with decommissioning, as construction operation and maintenance of the project are detailed within the deemed licence however decommissioning is not referred to.	decommissioned in accordance with a programme approved by the Secretary of State under section 106 (approval of decommissioning programmes) of the 2004 Act. The Applicant does not intend for the deemed Marine Licence to cover decommissioning activities.	
Mon_054_544_010623	S42/S44	Email	Please find below further detailed comments on the draft DCO and deemed Marine Licence. These are not intended to be comprehensive, rather to assist in the development of the deemed Marine Licence. Accordingly, NRW MLT may wish to make further comment at a future stage, and in response to any further information that may be submitted. Part 6 (43) Service of notices Part 6 (45) Requirements, appeals, etc Part 6 (46) Arbitration Schedule 13 Arbitration rules Clarification is required to the applicability of these provisions to the deemed Marine licence.	Service of notices: Schedule 14, Part 1, paragraph 1(5) of the draft DCO details the notice provisions for the dML. Requirements, appeals, etc: Article 45 only relates to matters under the TCPA 1990 and therefore it does not apply to NRW. Arbitration: article 46(2) has been updated to include NRW such that the arbitration provisions are specifically excluded where there is a dispute between the Applicant and NRW as to any provisions in the Order. Schedule 13 is consequently also excluded.	No
Mon_054_545_010623	S42/S44	Email	Part 2 Section 7(3), and Section 7(10) Schedule 14 –Section 8 - Clarification is required why the DCO is seeking that the ability to transfer the deemed Marine Licence is passed to the Secretary of State (SoS) rather than remaining with NRW as the Licensing Authority. Has this been requested by the SoS?		No
Mon_054_546_010623	S42/S44	Email	Schedule 14 -Interpretation - Reference is made within the Interpretation, and for the purpose of submission of notification to the Marine Case Management System (MCMS). The MCMS is a case management system used by the MMO and is not used by NRW MLT, reference to this system within the licence should be removed. As referred to above, Welsh Government remain the relevant Enforcement Authority for the purpose of the Marine Licence. This should be made clear within the interpretation, and relevant contact details included. Welsh Government Marine Enforcement contact details are: REDACTED Addresses listed include CEFAS and Cadw, however there is no reference within the licence of any requirements to contact either of these parties, we would therefore advise these are removed.	Reference to MCMS has been removed from Schedule 14 of the draft DCO. Cefas and Cadw have been removed from Schedule 14, Part 1, paragraph 1(5) and Welsh Government Marine Enforcement Officers have been added.	No
Mon_054_547_010623	S42/S44	Email	Section 3 –"In connection with the licensed activities in Work Area 1 and to the extent that they do not otherwise form part of any such work, further associated development comprising such other works as may be necessary or expedient for the purposes of or in connection with the relevant part of the authorised project and which fall within the scope of the work assessed by the environmental statement, including" - NRW MLT consider that this sentence is unclear please clarify its purpose.	This is standard DCO drafting to ensure that the full scope of works assessed as part of the project within the Environmental Statement can be constructed without having to list out every element of those works	No
Mon_054_550_010623	S42/S44	Email	Section 5-Co-ordinates in latitude and longitude decimal degrees should be provided for the licensable area covered by this licence within which the works consented by this licence will be bounded.	Coordinates for the elements of the offshore works which are to be included within the deemed marine licence are included in Schedule 14, Part 2, Table 3 of the draft DCO.	No
Mon_054_551_010623	S42/S44	Email	Section 7 - See Paragraph 484 above in relation to the duration of the licence.	The Applicant notes your response.	No
Mon_054_552_010623	S42/S44	Email	Section 10 - NRW MLT are unclear what this section is seeking to achieve, please provide further clarification surrounding the intention/purpose of the condition.	The deemed marine licence will be in force for the period of time in which the DCO is in force.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_054_553_010623	S42/S44	Email	Section 11 - See Paragraph 481above, NRW MLT consider the parameters should be bespoke to each licence to identify what will take place under each specific licence.	This paragraph deals with potential amendments and variations to the approved details, plans and schemes, which can only be agreed with NRW where it is demonstrated that such amendment or variation is unlikely to give rise to any materially new or materially different environmental effects from those assessed in the Environmental Statement. This approach is entirely in accordance with general planning and Environmental Impact Assessment (EIA) principles and the process routinely undertaken to apply for amendments and variations of any consent in an EIA context.	No
Mon_054_554_010623	S42/S44	Email	Section 11- Table 3NRW MLT cannot find reference to the following parameters within the PEIR Chapter 3 –Offshore project description:•Maximum total rotor swept area (m2)•Maximum total length of cables (inter-array and interconnector) (km)•Maximum number of cable crossings (inter-array and interconnector) (km)Please clarify where these parameters are detailed within the ES.	Rotor diameter, cable length and number of cable crossings are provided in Volume 1, Chapter 3: Project description of the Environmental Statement (see Tables 3.1, 3.6, 3.20 and 3.26). Maximum total rotor swept area (m2) is not a controlling parameter for the purposes of the Application and is therefore not included as a parameter in the draft DCO. Maximum total length of cables (interarray and interconnector) (km) this parameter is included in Schedule 14, Part 2, Table 3 of the draft DCO. Maximum number of cable crossings (inter-array and interconnector) (km) this parameter is included in Schedule 14, Part 2, Table 3 of the draft DCO.	No
Mon_054_555_010623	S42/S44	Email	Section 12(1) -The undertaker may at any time maintain the authorised project, except to the extent that this licence or an agreement made under this licence provides otherwise. NRW MLT consider that this sentence is unclear please clarify its purpose.	This is standard DCO drafting to confirm that the dML includes allow for the general ability to maintain the authorised scheme unless stated or modified elsewhere.	No
Mon_054_556_010623	S42/S44	Email	Section 12(3) "substantially" can be removed	This has been removed.	No
Mon_054_557_010623	S42/S44	Email	Section 13 Please identify any time frames that appear to set a deadline for NRW MLT as Licensing Authority and why. The Licence sets out obligation for the undertaken, we do not consider it appropriate that the licence should set deadlines for the Licensing Authority.	This is standard DCO dML drafting to ensure that the discharge of the dML conditions are achieved within a reasonable timeframe and to avoid delays to the project.	No
Mon_054_558_010623	S42/S44	Email	Section 14 Notifications should be sent to both NRW MLT and the Welsh Government Marine Enforcement Officers (MEO), and likewise provision for inspections should reference both NRW and the MEO.	Condition 13 of the dML has been updated to reflect this comment.	No
Mon_054_559_010623	S42/S44	Email	Section 14(6 and 7) NRW MLT would expect to be informed at least 10 days prior to commencement of the licenced activities.	Condition 13 of the dML has been updated to reflect this comment.	No
Mon_054_560_010623	S42/S44	Email	Section 16(4) NRW MLT would expect disposal returns to be submitted by the 31 January detailing quantities disposed of in July to December, and by the 31 July detailing quantities disposed of between January –June. This is in line with OSPAR reporting requirements on all other disposal licences in Wales.	Condition 16 of the dML has been updated to reflect this comment.	No
Mon_054_561_010623	S42/S44	Email	Section 16(7) This should reference MEO as well as NRW MLT	Noted. This wording has been added to the application DCO and dML	No
Mon_054_562_010623	S42/S44	Email	Section 16(10) NRW MLT do not have a dropped object procedure form, however, NRW MLT would expect notification to be provided.	Approval of a dropped objects plan prior to commencement has been added to condition 18 and reference to notifications being given to NRW of dropped objects in accordance with this plan has been included in condition 16(10).	No
Mon_054_563_010623	S42/S44	Email	Section 17 Any loss should also be notified to MEO, Trinity House (TH) and Maritime and Coastguard Agency (MCA). In relation to Force Majeure NRW licences usually also include the condition below: Should it be necessary for the Licence Holder to recover or remove from the Licensed Area any equipment, plant or machinery accidentally dropped when undertaking the Licensed Activities, the Licence Holder is permitted to do so provided that the methodology for such recovery or removal has been approved by the Licensing Authority.	Reference to the MEO has been included in condition 17.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_054_564_010623	S42/S44	Email	Section 16(10) and Section 17NRW licences usually contain the following standard condition: The Licence Holder must remove any deposited material within one month of notice being given by Licensing Authority or Marine Enforcement Officers if they consider this necessary or advisable for the safety of navigation and shall not replace such material until the Licensing Authority or Marine Enforcement Officers have given their written approval.	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_054_565_010623	S42/S44	Email	Section 16NRW licences usually contain the following standard condition: The Licence Holder must ensure that plant, vehicles, and machinery are not refuelled on the foreshore or in the sea.	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_054_566_010623	S42/S44	Email	Section 18 (2) Is there a reason why the plan showing the area of works and the programme of works are excluded here? If they are excluded what is the proposed timeframe for their submission?	These details will form part of the documents submitted prior to commencement and details in condition 18 of the draft DCO.	No
Mon_054_568_010623	S42/S44	Email	Section 18In relation to activities including Unexploded Ordnance (UXO) clearance and Impact Piling it is expected that information is inputted into the Joint Nature Conservation Committee (JNCC) noise registry.UK Marine Noise Registry) The Licence Holder must complete an entry into the UK Marine Noise Registry detailing the proposed dates and locations and nature of the [insert activities] at least 10 days prior to its commencement. b) The Licence Holder must amend the marine noise registry proposed activity form should the timing of the [insert activities] alter or no longer remain part of the project. c)The Licence Holder must complete an entry into the Marine Noise Registry detailing the actual dates, location(s) and nature of the [insert activities] every 6monthsfollowing the commencement of [insert activities] until the completion of [insert activities] with the final entry to be completed within 8 weeks of completion of the noisy activity.	A new marine noise registry condition has been added to the dML (condition 29).	No
Mon_054_569_010623	S42/S44	Email	Section 19(1) –"insofar as is relevant to that activity or phase "This gives a level of ambiguity to the condition. The condition should make clear when each plan is required.	This wording is included to make it clear that the undertaker may submit and have discharged a plan that covers the relevant stage or part of the licenced activities rather than the whole of those activities. The plan submitted to NRW would be clear as to the extent of the licenced activities any plan is intended to cover.	No
Mon_054_570_010623	S42/S44	Email	Section 19(1) Reference is made to Plans to be agreed with TH, MCA and UK Hydrographic Office (UKHO). A number of the plans detailed relate to matters outside their remit e.g. archaeology, marine mammals. NRW MLT would advise if reference is made to these organisations, the specific relevant plans should be referred to.	Condition 18(1) states that these bodies will be consulted "as appropriate" so will not need to be consulted on matters outside of their remit.	No
Mon_054_571_010623	S42/S44	Email	Section 19(1)(c) This section sits within Pre-construction plans and documents, however, sets out timeframes for submission of operation monitoring which is proposed to be agreed during the construction phase.	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_054_572_010623	S42/S44	Email	Section 20 NRW MLT are unclear what this section is seeking to achieve, please provide further clarification surrounding the intention/purpose of the condition.	This is a standard ML condition required by MCA.	No
Mon_054_573_010623	S42/S44	Email	Section 21 Notification should also be provided to the MEO.	Noted, this has been added to the application DCO and dML	No
Mon_054_574_010623	S42/S44	Email	Section 22 NRW MLT would suggest the relevant timing for submission referred to in 19(1)(c) is replicated here. This condition refers to the statutory nature conservation body. Clarification is required whether this preconstruction monitoring condition also seeks to ensure adequate navigation, or archaeological surveys and monitoring is agreed orif these are to be achieved under separate conditions.	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_054_575_010623	S42/S44	Email	Section 23(1) NRW MLT would suggest the relevant timing for submission referred to in 19(1)(c) is replicated here. This should specify that works cannot commence until the construction monitoring has been agreed.	Condition 25 follows the timings in condition 18(1)(c) and condition 18(1) includes the prohibition on commencement until construction monitoring has been agreed.	No
Mon_054_576_010623	S42/S44	Email	Section 23(2) Clarification whether monitoring of 4 piles has been requested by the SNCB.	This is a standard condition for offshore wind projects.	No
Mon_054_577_010623	S42/S44	Email	Section 23(7) Suggest reordering so that this comes before Section 23(6) which relates to navigation monitoring.	Condition 25 of the dML has been updated to reflect this comment.	No
Mon_054_578_010623	S42/S44	Email	Section 24(1) NRW MLT would suggest the relevant timing for submission referred to in 19(1)(c) is replicated here. This should specify that operations cannot commence until the post construction monitoring has been agreed by NRW MLT as the Licensing Authority.	Condition 26 follows the timings in condition 18(1)(c) and condition 18(1) includes the prohibition on commencement until post-construction monitoring has been agreed.	No
Mon_054_579_010623	S42/S44	Email	Section 23(3)(a)-(c) Assume these have been requested and agreed with relevant stakeholders.	The Applicant assumes the comment refers to 24(3)(a)-(c) of the dML consulted on at PEIR (as 23 does not include (3)(a)-(c) clauses). Post construction monitoring has been a subject of discussion at relevant Expert Working Groups, or other technical engagement groups. An Offshore in-principle monitoring plan (Document reference J15) has been submitted as part of the DCO application.	No
Mon_054_580_010623	S42/S44	Email	Section 22, 23 and 24All those conditions referring to agreement of monitoring should also specify that environmental monitoring reports must be submitted to NRW MLT for approval of the Licensing Authority in line with the timetable agreed within the Monitoring Plan.	See conditions 24(1), 25(7) and 26(4).	No
Mon_054_581_010623	S42/S44	Email	Section 24 (5) This statement appears unclear. Please could you clarify its intention.	The wording of this condition has been revised to align with condition 19(1)(d)(i)(cc)	No
Mon_054_582_010623	S42/S44	Email	Section 25NRW MLT would usually expect in 4 months not 6. Should also include the final location and technical specification of the cables, and location of buried and surface laid cables.	Condition 25 of the dML has been updated to reflect this comment.	No
Mon_054_583_010623	S42/S44	Email	No reference has been made to the submission of decommissioning plans under the Marine licence or for a post decommissioning survey which are usually a requirement of the MCA and UKHO.	Please see Marine Licence Principles Document (Document Reference J9).	No
Mon_054_584_010623	S42/S44	Email	NRW MLT would seek that a compliance report is submitted prior to commencement of work that identify how conditions have been and are to be addressed.	Please see Marine Licence Principles Document (Document Reference J9).	No
Mon_054_585_010623	S42/S44	Email	In relation to the disposal activity: The Licence Holder must keep a log detailing the time, date, location (latitude and longitude position (in decimal degrees) of the deposit within the Deposit Area.) and quantity of material deposited at sea. This log must be available for inspection by appropriately authorised officers of the Licensing Authority and Marine Enforcement Officers.	Waste disposal arrangements form part of the offshore environmental management plan secured under condition 18(1)(e).	No
Mon_055_003_010623	S42/S44	Email	Asset Protection The proposed development site is crossed by public sewers and watermains. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times. No part of any building or operational development will be permitted within 3 metres either side of the: 180mm combined MDPE rising main (292292.56, 378213.11). 4" upvc watermain (294423.36, 378676.41).	The location of existing water management infrastructure has been taken into account in the site selection and refinement of the design (see Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement). The Applicant has included protective provisions for the protection of Welsh Water in the draft DCO.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			 525mm foul conc sewer (294586.11, 378565.99). 32mm MDPE watermain (294575.32, 378586.40). 		
			• 63mm MDPE watermain (94591.51, 378588.76).		
			4" uPVC watermain (292147.85, 378079.10).3" CI watermain (291717.48, 378061.56).		
			100mm uPVC foul sewer (292837.92, 378026.48).		
			 3" uPVC watermain (292268.71, 375532.36). 		
			 3" CI watermain (292735.70, 374831.21). 		
			 3" CI watermain (293622.97, 373715.42). 		
			3" uPVC watermain (294531.70, 373261.93).		
			 2" watermain (294706.33, 373295.01). 		
			 8" abandoned raw watermain at (297383.92, 373023.15). 		
			62mm MDPE watermain (297796.48, 373366.31).		
			• 6", 8", 10", 200mm watermains (299242.88, 374048.84).		
			• 90mm MDPE watermain (300411.23, 373355.20).		
			• 90mm MDPE watermain (300353.37, 372785.03).		
			• 280mm HPPE, 500mm DIEL, 500mm GRP watermain (301119.75, 373661.25).		
			• 225mm surface water and VC foul sewers (301555.46, 373804.27).		
			• 150mm and 225mm combined sewers (303449.45, 373816.32).		
			• 10" CI, 280mm HPPE 5" CI, 500mm abandoned GRP, 350mm DIEL watermains (303147.85, 373829.49).		
			• 150mm VC foul sewer (301690.85, 371603.71).		
			• 90mm MDPE watermain (301965.38, 371258.66).		
			• 63mm MDPE watermain (301729.89, 371103.77).		
			• 32mm MDPE watermain (301305.51, 371212.07).		
Mon_055_005_010623	S42/S44	Email	Our strong recommendation is that your site layout takes into account the location of the assets crossing the site and should be referred to in any master-planning exercises or site layout plans submitted as part of any subsequent planning application. We also request an accurate location plan of the proposed pipeline so that we can assess its impacts on our infrastructure further. Further information regarding Asset Protection is provided in the attached Advice & Guidance note.	The location of existing water management infrastructure has been taken into account in the site selection and refinement of the design (see Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement). The Applicant has included protective provisions for the protection of Welsh Water in the draft DCO.	No
Mon_063_001_020623	S42	Email	Standard navigation conditions for inclusion within Deemed Marine Licences (DML) for offshore renewable energy installations. Agreed by Marine Management Organisation (MMO), Trinity House, Maritime and Coastguard Agency (MCA) and UK Hydrographic Office (UKHO)	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_063_002_020623	S42	Email	Notifications and Inspections: 1) The undertaker must inform the MMO Coastal Office in writing at least 5 days prior to the commencement of the authorised projector any part thereof, and within 5 days of completion of the authorised project.	Notifications will be provided to NRW under condition 13 of the dML.	No





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Mon_063_003_020623	S42	Email	2) The Kingfisher Information Service of Seafish, must be informed of details of the vessel routes, timings and locations relating to the construction of the authorised projector any part thereof by email to REDACTED:	Condition 13 of the dML has been updated to reflect this comment.	No
Mon_063_004_020623	S42	Email	a)at least 14 days prior to the commencement of offshore activities, for inclusion in the Kingfisher Fortnightly Bulletin and offshore hazard awareness data, and;	Condition 13 of the dML has been updated to reflect this comment.	No
Mon_063_005_020623	S42	Email	b) as soon as reasonably practicable and no later than 24 hours of completion of all offshore activities.	Condition 13 of the dML has been updated to reflect this comment.	No
Mon_063_006_020623	S42	Email	Confirmation of notification must be provided to the MMO within 5 days.	Notifications will be provided to NRW under condition 13 of the dML.	No
Mon_063_007_020623	S42	Email	3) The undertaker must ensure that a local notification to mariners is issued at least 14 days prior to the commencement of the authorised projector any part there of advising of the start date of each Work No. <insert>and the expected vessel routes from the construction ports to the relevant location. Copies of all notices must be provided to the MMO, MCA and UKHO within 5 days.</insert>	Condition 13 of the dML has been updated to reflect this comment. Notifications will be provided to NRW under condition 13 of the dML.	No
Mon_063_008_020623	S42	Email	4) The undertaker must ensure that local notifications to mariners are updated and reissued at weekly intervals during construction activities and at least 5 days before any planned operations (or otherwise agreed) and maintenance works and supplemented with VHF radio broadcasts agreed with the MCA in accordance with the construction and monitoring programme approved under deemed marine licence condition <insert>.Copies of all notices must be provided to the MMO and UKHO within 5 days.</insert>	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_063_009_020623	S42	Email	5) The undertaker must notify the UKHO of the completion(within 14 days) of the authorised projector any part thereof in order that all necessary amendments are made to nautical charts .Copies of all notices must be provided to the MMO and MCA within 5 days.	Condition 13 of the dML has been updated to reflect this comment. Notifications will be provided to NRW under condition 13 of the dML.	No
Mon_063_010_020623	S42	Email	6) In case of damage to, or destruction or decay of, the authorised project seaward of MHWS or any part thereof, excluding the exposure of cables, the undertaker shall as soon as reasonably practicable and no later than 24 hours following the undertaker becoming aware of any such damage, destruction or decay, notify MMO, MCA, Trinity House, UKHO, the Kingfisher Information Service of Seafish and regional fisheries contacts.	Condition 13 of the dML has been updated to reflect this comment. Notifications will be provided to NRW under condition 13 of the dML.	No
Mon_063_011_020623	S42	Email	7) In case of buried cables becoming exposed on or above the seabed, the undertaker must within three days following identification of a cable exposure, notify mariners, regional fisheries contacts and the Kingfisher Information Service of Seafish of the location and extent of exposure. Copies of all notices must be provided to the MMO, MCA, Trinity House, and the UKHO within 5 days.	Condition 13 of the dML has been updated to reflect this comment. Notifications will be provided to NRW under condition 13 of the dML.	No
Mon_063_012_020623	S42	Email	Pre-construction plans and documents: The authorised project shall not commence until the following have been submitted to and approved by the MMO. Each programme, statement, plan, protocol, scheme or other detail required to be approved under this condition must be submitted to the MMO for approval at least 6 months prior to the commencement of the authorised project except where otherwise stated.	Notifications will be provided to NRW under condition 18 of the dML.	No
Mon_063_013_020623	S42	Email	A plan to be agreed in writing with the MMO following appropriate consultation with Trinity House, the MCA and UKHO, setting out proposed details of the authorised project, including the:	Condition 18(1)(a) requires the submission of a design plan for approval.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_063_014_020623	S42	Email	a) number, dimensions, specification, foundation type(s) and depth for each WTGs, offshore platforms, substations and meteorological masts;	Condition 18(1)(a) requires the submission of a design plan for approval.	No
Mon_063_015_020623	S42	Email	b) the grid coordinates of the centre point of the proposed location for each WTG, platform, substation and meteorological mast;	Condition 18(1)(a) requires the submission of a design plan for approval.	No
Mon_063_016_020623	S42	Email	c) proposed layout of all cables; and	Condition 18(1)(a) requires the submission of a design plan for approval.	No
Mon_063_017_020623	S42	Email	d) location and specification of all other aspects of the authorised project.	Condition 18(1)(a) requires the submission of a design plan for approval.	No
Mon_063_018_020623	S42	Email	2) An Aids to Navigation Management Plan to be agreed in writing by the MMO following appropriate consultation with Trinity House specifying how the undertaker will ensure compliance with conditions (1) to (4) of 'Aids to Navigation' from the commencement of construction of the authorised project to the completion of decommissioning.	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_063_019_020623	S42	Email	3)No part of the authorised project may commence until the MMO,in consultation with the MCA, has confirmed in writing that the undertaker has taken into account and, so far as is applicable to that stage of the project, adequately addressed all MCA recommendations as appropriate to the authorised project contained within MGN654 "Offshore Renewable Energy Installations (OREIs) –Guidance on UK Navigational Practice, Safety and Emergency Response Issues" and its annexes.	Condition 22 requires the undertaker to take account of the Offshore Renewable Energy Installations (OREIs) –Guidance on UK Navigational Practice, Safety and Emergency Response Issues.	No
Mon_063_020_020623	S42	Email	4)A construction method statement in accordance with the construction methods assessed in the environmental statement and including details of –	Condition 18(1)(d) requires the submission of an offshore construction method statement for approval.	No
Mon_063_021_020623	S42	Email	i) Cable specification, installation and monitoring, to include:	Condition 18(1)(d) requires the submission of an offshore construction method statement for approval.	No
Mon_063_022_020623	S42	Email	a) technical specification of offshore cables below MHWS;	Condition 18(1)(d) requires the submission of an offshore construction method statement for approval.	No
Mon_063_023_020623	S42	Email	b) a detailed cable laying plan for the Order limits, incorporating a burial risk assessment encompassing the identification of any cable protection that exceeds 5% of navigable depth referenced to chart datum and, in the event that any area of cable protection exceeding 5% of navigable depth is identified, details of any steps (to be determined following consultation with the MCA and Trinity House) to be taken to ensure existing and future safe navigation is not compromised or such similar assessment to ascertain suitable burial depths and cable laying techniques, including cable protection; and	Condition 18(1)(d) requires the submission of an offshore construction method statement for approval.	No
Mon_063_024_020623	S42	Email	c) proposals for monitoring offshore cables including cable protection during the operational lifetime of the authorised scheme which includes a risk based approach to the management of unburied or shallow buried cables.	Condition 18(1)(d) requires the submission of an offshore construction method statement for approval.	No
Mon_063_025_020623	S42	Email	Pre-construction monitoring and surveys 5) Aswath bathymetric survey to IHO Order 1a of the area within the Offshore Order Limits extending to an appropriate buffer around the site, must be undertaken. The survey shall include all proposed cable routes. This should fulfil the requirements of MGN654 and its supporting 'Hydrographic Guidelines for Offshore Renewable Energy Developers', which includes the requirement for the full density data and reports to be delivered to the MCA and the UKHO for the update of nautical charts and publications. This must be submitted as soon as possible, and no later than [three months] prior to construction. The Order Limit shapefiles must be submitted to MCA. The Report of Survey must also be sent to the MMO.	Condition 24 requires the undertaker to do a swath-bathymetry survey. Notifications will be provided to NRW under condition 24 of the dML.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_063_026_020623	S42	Email	Aids to Navigation: 1) The undertaker shall during the whole period from the commencement of construction of the authorised project to the completion of decommissioning exhibit such lights, marks, sounds, signals and other aids to navigation, and to take such other steps for the prevention of danger to navigation as Trinity House may from time to time direct.	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_063_027_020623	S42	Email	2) The undertaker must during the whole period from the commencement of construction of the authorised project to the completion of decommissioning keep Trinity House and the MMO informed of progress of the authorised project including;	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_063_028_020623	S42	Email	a. notice of commencement of construction of the authorised project within 24 hours of commencement having occurred;	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_063_029_020623	S42	Email	b. notice within 24 hours of any aids to navigation being established by the undertaker; and	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_063_030_020623	S42	Email	c. notice within 5 days of completion of construction of the authorised project.	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_063_031_020623	S42	Email	3) The undertaker must provide reports to Trinity House on the availability of aids to navigation in accordance with the frequencies set out in the aids to navigation management plan agreed pursuant to condition <insert>using the reporting system provided by Trinity House.</insert>	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_063_032_020623	S42	Email	4) The undertaker must during the whole period from the commencement of construction of the authorised project to the completion of decommissioning notify Trinity House and the MMO of any failure of the aids to navigation and the timescales and plans for remedying such failures, as soon as possible and no later than 24 hours following the undertaker becoming aware of any such failure.	Noted, these comments have been taken into account in the drafting of the application DCO and dML	No
Mon_063_033_020623	S42	Email	Colouring of structures: 1) Except as otherwise required by Trinity House the undertaker must paint all structures forming part of the authorised project yellow (colour code RAL 1023) from at least HAT to a height as directed by Trinity House. Unless the MMO otherwise directs, the undertaker must paint the remainder of the structures grey (colour code RAL 7035).	A new condition 14 has been added to address this comment. Details will be provided to NRW under condition 14 of the dML.	No
Mon_063_034_020623	S42	Email	Construction Monitoring 1) Construction monitoring must include vessel traffic monitoring by automatic identification system for the duration of the construction period. An appropriate report must be submitted to the MMO, Trinity House and the MCA at the end of each year of the construction period.	Condition 25 requires the undertaker to do vessel monitoring in accordance with a vessel traffic monitoring strategy which must be submitted for approval under condition 18(1)(I). Details will be provided to NRW under condition 25 of the dML.	No
Mon_063_035_020623	S42	Email	Post-construction plans and documents The undertaker must conduct a swath bathymetric survey to IHO Order 1a of the installed export cable route and provide the data and survey report(s) to the MCA and UKHO. The MMO should be notified once this has been done, with a copy of the Report of Survey also sent to the MMO.	Condition 26 requires the undertaker to do swath-bathymetry survey postconstruction. Details will be provided to NRW under condition 26 of the dML.	No
Mon_063_036_020623	S42	Email	2)On post decommissioning, the undertaker must conduct a swath bathymetric survey to IHO Order 1a of the cable route and the installed generating assets area and provide the data and survey report(s) to the MCA and UKHO. [Decommissioning is not consented at this stage so this can't be included in the DCO/DML]	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_063_037_020623	S42	Email	This should fulfil the requirements of MGN654 and its supporting 'Hydrographic Guidelines for Offshore Renewable Energy Developers', which includes the requirement for the full density data and reports to be delivered to the MCA and the UKHO for the update of nautical charts and publications.	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_063_038_020623	S42	Email	3) Post construction monitoring must include vessel traffic monitoring by automatic identification system for a duration of three consecutive years following the completion of construction of authorised project, unless otherwise agreed in writing by the MMO. An appropriate report must be submitted to the MMO, Trinity House and the MCA at the end of each year of the three year period.	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_063_039_020623	S42	Email	Completion of Construction (1) The undertaker must submit a close out report to the MMO, MCA, UKHO and the relevant statutory nature conservation body within three months of the date of completion of construction. The close out report must confirm the date of completion of construction and must include the following details—	Condition 28 requires the submission of a close-out report. Details will be provided to NRW, MCA, Trinity House, UKHO and the statutory nature conservation body under condition 28 of the dML.	No
Mon_063_040_020623	S42	Email	(2) the final number of installed wind turbine generators;	Condition 28 requires the submission of a close-out report. Details will be provided to NRW, MCA, Trinity House, UKHO and the statutory nature conservation body under condition 28 of the dML.	No
Mon_063_041_020623	S42	Email	(3) as built plans; and	Condition 28 requires the submission of a close-out report. Details will be provided to NRW, MCA, Trinity House, UKHO and the statutory nature conservation body under condition 28 of the dML.	No
Mon_063_042_020623	S42	Email	(4) latitude and longitude coordinates of the centre point of the location for each wind turbine generator and offshore platform, substation, booster station and meteorological mast; provided as Geographical Information System data referenced to WGS84 datum.	Condition 28 requires the submission of a close-out report. Details will be provided to NRW, MCA, Trinity House, UKHO and the statutory nature conservation body under condition 28 of the dML.	No
Mon_063_043_020623	S42	Email	(5) latitude and longitude coordinates of the interarray and export cable routes; provided as Geographical Information System data referenced to WGS84 datum.	Condition 28 requires the submission of a close-out report. Details will be provided to NRW, MCA, Trinity House, UKHO and the statutory nature conservation body under condition 28 of the dML.	No
Mon_063_044_020623	S42	Email	NOTE: These are standard conditions to be applied to all DMLs, other maybe requested for site specific projects.	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_068_008_010623	S47	Email	Cable burial. The consultation indicates a desire to achieve 1m burial of cables to eliminate potential snagging with fishing gear. However we have concerns that the developer may use rock burial or mattress where appropriate, i.e. when crossing points with other existing cables. This would be detrimental to the sandygravelly Queen scallop beds and therefore should be avoided where the commercial Queen scallop beds are located. Scallop vessels have already paid witness to this with recently completed projects such as Moray east, where rock dumping has been excessive. We would urge that cable burial closely ties in with the surrounding gravelly substrate sea bed like for like.	Cable protection will be designed to minimise snagging hazards as far as possible. The Applicant has committed to the development of a cable burial plan, to outline cable burial depth, cable protection and monitoring of cables. The cable burial plan will be secured through a condition in the marine licence.	Yes
Mon_072_069_010623	S47	Email	(cc)Several proposed measures lack necessary detail. By way of example, it is unclear what 'poor conditions' for use of fog horns entail and how this requirement will be operated in practice. Similarly, the use of guard vessels "as required" does not make clear when or how such a measure will be taken.	The requirements and details for risk control measures have been agreed with stakeholders through the NRA, and where appropriate, relevant conditions included as part of the draft DCO.	Yes
Mon_072_070_010623	S47	Email	dd) Other proposed measures are unrealistic and, if adopted, risk falling foul of international regulations. Section 1.8.6.31 of the Mona PEIR Chapter 12 discusses how the geometries of offshore wind farms could reduce the visible appreciation of other vessels and claims "however, larger vessels would be identifiable from AIS and therefore passing arrangements could be agreed.	The requirements and details for risk control measures have been agreed with stakeholders through the NRA, and where appropriate, relevant conditions included as part of the draft DCO.	Yes





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
			"The suggestion that AIS should be relied on for collision avoidance is deeply concerning. This is especially so in light of Marine Guidance Note 324, which stresses that AIS information should be "treated with extreme caution and only used for enhancing situation awareness and not for collision avoidance decision making." (See MGN 324, section 4.10) Stena Line submits that such proposed overreliance on AIS as a collision avoidance tool could be in breach of COLREG 7(c).		
Mon_072_071_010623	S47	Email	(ee) There is also a lack of detail on how measures will be enforced, for example in relation to Marine Operating Guidelines, vessel standards, PPE, training and vessel monitoring. Further, a statement that vessels should comply with international, UK and Flag State regulations cannot be classified as a mitigation measure. In any event, the proposed mitigation measures must be backed up by tangible and effective action points.	The requirements and details for risk control measures have been agreed with stakeholders through the NRA, and where appropriate, relevant conditions included as part of the draft DCO.	Yes
Mon_072_072_010623	S47	Email	(ff) Overall, while Stena Line recognises and supports the measures listed, its concern is how the measures will be achieved and regulated in practice so as to have any effect beyond being a statement of intent.	The requirements and details for risk control measures have been agreed with stakeholders through the NRA, and where appropriate, relevant conditions included as part of the draft DCO.	Yes
Mon_088_028_040623	S42	Email	WTW advocates that the developer commits to developing a Cable Specification and Installation Plan (CSIP) which will contain a Cable Burial Risk Assessment (CBRE).	Development and adherence to a CSIP which includes a CBRA is secured within the deemed marine licence in schedule 14 of the Draft DCO (document reference: C1) and is expected to be secured within the standalone NRW marine licence.	No
Mon_002_005_080623	S42/S44	Email	C. COMMENTS ON DRAFT DCO In addition to consent for the construction and operation of an offshore windfarm, the draft DCO includes provision for secondary powers for 'associated development', including streetworks and compulsory acquisition powers.	Noted, these comments have been considered in the drafting of the application DCO including the dML.	No
Mon_002_006_080623	S42/S44	Email	Owing to the large geographic area affected by the onshore works, the Council has concerns about the wide remit of secondary powers, and in particular the proposed powers for temporary stopping up or restriction on the use of streets, and the temporary stopping up or diversion of public rights of way, as it would remove strategic control from the local highway authority to manage the highway and public rights of way network effectively for the benefit of users. Any closures or diversions must be agreed within the local highway authority, and should be diverted / closed for the minimum possible time necessary.	Powers to temporarily stop up or restrict the use of streets and the temporarily stop up or divert public rights of way are included in the drat DCO as is well precedented in DCOs. This is to avoid getting multiple separate consents from the relevant local authorities for works and is within the spirit of the DCO process. Appropriate controls have been included in Schedule 2 where requirements are set out preventing commencement of development until a construction traffic management plan has been approved by the relevant authority and public rights of way management strategy has been has been approved by the relevant authority see Requirement 8 of Schedule 2 of the draft DCO.	
Mon_002_007_080623	S42/S44	Email	SCHEDULE 2 REQUIREMENTS Requirement 5 – Sub-Station Works. The Council does not agree with this Requirement. Full details of substation siting, design, scale and layout, and appearance of buildings should be included in the application in order that assessment of effects is robust and understood. At a last resort, should any details of the substation be subject of the Requirement, then it is essential that the upper limits for the substation are clearly defined and embedded in the requirement. E.g. site area shall not exceed XX,XXX m2 / external equipment shall not exceed height of 18m / number of buildings shall not exceed 8 / buildings shall not exceed height of 15m etc.). Details of vehicular access, internal roads, parking and turning areas, boundary treatments and lighting should also be itemised.	Parameters for the substation are included in Requirement 5 of Schedule 2 of the draft DCO. Full details are not provided at this stage as the Applicant has taken the Rochdale Envelope approach such that the reasonable worst case scenario has been assessed in the Environmental Statement and detailed design will take place post-consent. This approach is well precedented for DCOs and is entirely appropriate in the circumstances.	No
Mon_002_008_080623	S42/S44	Email	Requirement 9 - Construction. The Code of Construction Practice should also include provision of a communication plan outlining how the local community will be informed about construction activities, set out a commitment to provide a single point of contact and complaints management and resolution procedure.	An Outline Communications Plan is included in the DCO application (Document Reference J26.4). Condition 9 of Schedule 2 of the draft DCO has been updated to reflect this comment.	No





Unique Reference Identifier	Type of consultee S42/S47/S44	Feedback method	Statutory consultation response received	Applicant response	Project change (directly or indirectly as a result of feedback)
Mon_002_009_080623	S42/S44	Email	Requirement 14 – Construction Hours. The Council have concerns with the proposed hours of working, and do not agree to 7am – 7pm working hours in locations close to residential receptors. Where working areas are close to residential receptors, hours of operation should be restricted to 8am – 6pm Monday to Saturday only, with no working on Sundays or Bank Holidays.	Noted, these comments have been considered in the drafting of the DCO application. The proposed working hours have been assessed in the ES.	No
Mon_002_010_080623	S42/S44	Email	The Council has no objection to inclusion of a provision which allows for works to be carried out outside of agreed working hours in exception circumstances. However the clause should make it clear that requests need to be made in writing to the Council at least 48 hours in advance, and should include an explanation why works cannot be carried out during agreed working hours and an outline of works proposed to be undertaken. The communications plan (referred to under Requirement 9 above) should also include a provision for a mechanism to notify affected communities of out of hours work in advance of them being undertaken.	The Outline Communications Plan (Document Reference J26.4) includes details how local authorities and local residents will be informed of any work that needs to take place outside the agreed working hours.	No
Mon_002_011_080623	S42/S44	Email	Requirement 15 - Restoration. Should include a clause which requires land condition to be recorded prior to commencement of development, and land to be restored to same or better standard than original.	Requirement 15 of Schedule 2 of the draft DCO requires the restoration of land used temporarily for construction which are not ultimately incorporated in permanent works or approved landscaping must be reinstated within twelve months of completion of the relevant stage of the onshore works in accordance with details approved by the relevant planning authority. The Outline soil management plan (document ref J26.8) sets out that in addition to the soil surveys undertaken prior to the submission of the DCO application the Applicant will undertake further soil surveys prior to the commencement of construction. This further survey work would be used to identify the depths of different topsoil and subsoil units (if necessary) to be stripped within the working areas and to inform a detailed Soil Management Plan to be agreed with the relevant local planning authority pursuant to Requirement 9 of Schedule 2.	No
Mon_002_012_080623	S42/S44	Email	Requirement 17. This requirement is not precise. The maximum noise levels from the substation site at the nearest noise sensitive receptors must be clearly defined and embedded in the Requirement.	Condition 16 of Schedule 2 of the draft DCO has been updated to reflect this comment.	No
Mon_002_026_080623	S42/S44	Email	As such, the Council has concerns with the proposed streetworks powers proposed to be embedded in the DCO, as it would remove control from the Council to carefully manage right of way closures at a strategic level.	The Applicant notes your response and will continue to engage with the Council on this matter.	No
Mon_002_028_080623	S42/S44	Email	The Council has concerns that, streetworks powers proposed in the draft DCO would not require rights of way to be brought back into use as soon as practical to do so, and paths may remain closed until all construction works have been completed, which will have a significant impact on the users during the construction phase.	The process for managing interactions with Public Rights of Way is outlined in the Outline Public Rights of Way Management Strategy (Document Reference J27).	No
Mon_002_031_080623	S42/S44	Email	The Council do not agree to the working hours of 7am -7pm in locations close to residential properties, and working hours should instead be restricted to 8am – 6pm where working areas are close to residential receptors, with no working on Sundays or Bank Holidays. Where exceptional circumstances require construction works to be carried out outside of approved hours of operational, this should be agreed in writing by the local planning authority at least 48 hours in advance and such provision should be embedded in the Requirements (please see comments above on draft DCO Requirements).	Noted, these comments have been considered in the drafting of the DCO application. The proposed working hours have been assessed in the ES. The Outline Communications Plan (Document Reference J26.4) includes details how local authorities and local residents will be informed of any work that needs to take place outside the agreed working hours.	No

Document Reference: E3.1
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Appendix E: Post-Statutory Consultation Engagement

E.1. Newsletter August 23





Hoffem ddiolch i bawb sydd wedi cymryd rhan yn ein hymgynghoriad diweddar ar gyfer Prosiect Gwynt Alltraeth Mona.

Mae'r adborth rydyn ni wedi'i gael yn ystod ein tri cham o ymgynghoriadau â chymunedau a rhanddeiliaid wedi ein helpu i fireinio llawer o agweddau ar ein cynigion. Erbyn hyn, rydyn ni'n gweithio tuag at gyflwyno cais am Orchymyn Cydsyniad Datblygu ar gyfer y prosiect yn 2024.

Ar ôl casglu'r holl adborth a gyflwynwyd i'r ymgynghoriad, mae tîm prosiect Mona wedi adolygu'r ymatebion amgylcheddol, cydsyniol, dichonoldeb peirianneg, y tir a chymunedol. Mae'r tîm hefyd wedi adolygu'r rhain yn erbyn y wybodaeth sydd wedi'i chynnwys yn ein Hadroddiad Gwybodaeth Amgylcheddol Ragarweiniol, a oedd yn destun ein hymgynghoriad diweddaraf, a oedd yn un statudol.

Mae'r cylchlythyr hwn yn tynnu sylw at ble mae'r newidiadau hynny i'r prosiect wedi cael eu gwneud wrth i ni symud ymlaen i gam nesaf yn natblygiad ein cynlluniau. Bydd hyn yn cynnwys rhagor o sgyrsiau gyda thirfeddianwyr a chynrychiolwyr cymunedol, yn ogystal â chynnal rhagor o arolygon.

Byddwn ni'n cyhoeddi rhagor o fanylion am elfennau ar y môr Prosiect Gwynt Alltraeth Mona yn yr hydref, a hynny ar ôl rhagor o waith archwilio yn y maes hwn, y byddwn ni'n ei gwblhau yn ystod misoedd yr haf. We would like to thank everybody who has taken part in our recent consultation for the Mona Offshore Wind Project.

The feedback we've received during our three phases of community and stakeholder consultation has helped us refine many aspects of our proposals and we are now working towards the submission of the project's Development Consent Order (DCO) application in 2024.

Having collated all the consultation feedback that was submitted, the Mona project team has reviewed the environmental, consenting, engineering feasibility, land and community responses. These responses have been considered against the information included within our Preliminary Environmental Information Report (PEIR), which was the subject of our most recent, statutory consultation.

This newsletter highlights where those refinements to the project have been made as we move on to the next stage of developing our plans, which will involve further conversations with landowners and community representatives, as well as conducting further surveys.

We will publish more details about the offshore elements of the Mona Offshore Wind Project in the autumn, following further offshore design work in this area, which we will be completing during the summer months. Fferm wynt ar y môr arfaethedig yn nwyrain Môr Iwerddon yw Prosiect Gwynt Alltraeth Mona. Mona Offshore Wind Ltd sy'n datblygu'r prosiect, ac mae'n fenter ar y cyd rhwng bp ac Energie Baden-Württemberg AG (EnBW).

Bydd y fferm wynt yn cynnwys hyd at 107 o dyrbinau gwynt, a fydd yn cynhyrchu oddeutu 1.5GW o drydan. Bydd yn cysylltu ag Is-orsaf bresennol y National Grid ym Modelwyddan. O ganlyniad i'n hymgynghoriad statudol, mae tîm Prosiect Gwynt Alltraeth Mona wedi gallu dewis un lleoliad ar gyfer is-orsaf ar y tir at ddibenion y cais am Orchymyn Cydsyniad Datblygu sydd ar ddod. Rydyn ni hefyd wedi dewis un llwybr ceblau ar y tir o'r opsiynau a gafodd eu cynnwys yn yr Adroddiad Gwybodaeth Amgylcheddol Ragarweiniol. Mae hyn yn dilyn ymgynghoriad anstatudol yn 2022 lle cyflwynwyd saith opsiwn is-orsaf ar y tir ar gyfer adborth. Roedd tîm y prosiect wedyn yn gallu llunio rhestr fer o ddau opsiwn yr ymgynghorwyd arnynt yn yr ymgynghoriad statudol.

Ar ôl ystyried yr ymgynghoriad hwnnw a'r adborth a gafwyd, rydyn ni wedi dewis opsiwn dau fel yr un y byddwn yn ei gynnwys o fewn ein cais am Gydsyniad Datblygu. Ni fydd opsiwn saith, a oedd i'r dwyrain o opsiwn dau, yn symud ymlaen ar ôl cael ei ddadethol.

Rydyn ni hefyd wedi dewis llwybr unigol ein cebl ar y tir. Byddwn ni'n siarad â thirfeddianwyr dros y misoedd nesaf, er mwyn i ni allu parhau i fireinio ein coridor cebl i un sydd tua 75m o led.

Mae'r map hwn yn dangos y newidiadau hyn.

The Mona Offshore Wind Project is a proposed offshore wind farm located in the east Irish Sea, being developed by Mona Offshore Wind Ltd, a joint venture of bp and Energie Baden-Württemberg AG (EnBW).

The wind farm will consist of up to 107 wind turbines, generating around 1.5GW of electricity. It will connect into the existing Bodelwyddan National Grid Substation.

As a result of our statutory consultation, the Mona Offshore Wind Project team has been able to select a single onshore substation location for the purposes of the forthcoming DCO application. We have also selected a single onshore cable route from the options that were included within the PEIR. This follows a non-statutory consultation in 2022 where seven options were presented for feedback. The project team was then able to shortlist two options which were consulted on at the statutory consultation.

feedback received, we have now chosen substation option two to take forward into our application for Development Consent. option seven, which was to the east of option two, has now been deselected and will not be taken forward.

Having considered that consultation and the

We have also now chosen our single onshore cable route and will be talking to landowners over the coming months, so that we can continue to refine down our cable corridor to one that is approximately 75m wide.

This map illustrates these refinements.



Rhagor o wybodaeth

Bydd rhagor o fanylion y tu ôl i ddewis yr is-orsaf ar y tir a'r llwybr ceblau a ffefrir yn cael eu rhoi yn yr adroddiad ar Ddewis Safle ac Ystyried Opsiynau Eraill. Bydd yr adroddiad hwn yn cael ei gyflwyno fel rhan o'r Datganiad Amgylcheddol a fydd yn cyd-fynd â'n cais am Orchymyn Cydsyniad Datblygu y flwyddyn nesaf.

Gwaith pellach

Byddwn ni nawr yn edrych ar opsiynau mynediad posibl ar gyfer adeiladu a gweithredu, yn ogystal â pharatoi strategaeth tirweddu a phlannu i liniaru effeithiau gweledol posibl ein hisorsaf ar y tir. Rydyn ni hefyd yn parhau i fireinio maint, cynllun ac uchder adeiladau'r is-orsaf ar y tir, i ymateb i'r adborth a gafwyd i'r ymgynghoriad.

Yn yr un modd, mae'r prosiect yn gweithio ar fireinio ein cynigion manwl ar gyfer y llwybr ceblau ar y tir, yn cynnwys ein strategaeth mynediad ar gyfer cerbydau adeiladu, a lleoliad compowndiau adeiladu. Rydyn ni hefyd yn penderfynu ar y ffyrdd mwyaf priodol i'r llwybr groesi ffyrdd, cyfleustodau a derbynyddion amgylcheddol, fel cyrsiau dŵr.

Ymateb i'ch adborth chi

Rydyn ni wedi ystyried yr holl adborth a gyflwynwyd yn ystod ein hymgynghoriad. Byddwn ni'n cyhoeddi'r adborth hwn, ac unrhyw ymateb gan y prosiect, yn ein Hadroddiad Ymgynghori a fydd yn cael ei gyflwyno fel rhan o'n cais am Orchymyn Cydsyniad Datblygu.

Cofrestru i gael y wybodaeth ddiweddaraf

Bydd rhagor o gyfleoedd i ymgysylltu â'r prosiect ac i bobl leol gael dweud eu dweud pan fyddwn wedi cyflwyno'n cais am Orchymyn Cydsyniad Datblygu ac yn ystod y cam archwilio. Gall partïon sydd â diddordeb gofrestru i gael y wybodaeth ddiweddaraf ar wefan yr Arolygiaeth Gynllunio drwy

https://infrastructure.planninginspectorate.gov.uk/cy/

More information

Further detail behind the selection of the preferred onshore substation and cable route will be provided within the Site Selection and Consideration of Alternatives report which will be submitted as part of the Environmental Statement that will accompany our DCO application next year.

Further work

We will now be looking at potential construction and operational access options, as well as preparing a landscaping and planting strategy to mitigate potential visual impacts of our onshore substation. We are also still refining the size, layout and height of the onshore substation buildings, in response to consultation feedback received.

Similarly, the project is now working to refine our detailed proposals for the onshore cable route including our access strategy for construction vehicles and the location of construction compounds. We are also determining the most appropriate ways for the route to cross roads, utilities and environmental receptors, such as watercourses.

Responding to your feedback

We have considered all the feedback that has been submitted during our consultation. We will publish this feedback, and any project responses, in our Consultation Report which will be submitted as part of our DCO application.

Register for updates

There will be further opportunities to engage with the project and for local people to have their say once we have submitted our DCO application and during the examination. Interested parties can register for updates on the Planning Inspectorate's website via https://infrastructure.planninginspectorate.gov.uk

www.morganandmona.com
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E.2. Newsletter September 2023



Partners in UK offshore wind



Delwedd ddangosol yw hon o sut allai rhan alltraeth Prosiect Gwynt Alltraeth Mona edrych. Gall y gwir ddyluniad fod yn wahanol.

This is an indicative image of what the offshore aspect of Mona Offshore Wind Project could look like. The actual design may differ.

Diweddariad prosiect: Hydref 2023 Ffin aráe Prosiect Gwynt Alltraeth Mona i gael ei leihau

Fel rhan o'n gwaith parhaus i ddatblygu cynlluniau ar gyfer Prosiect Gwynt Alltraeth Mona, ac yn dilyn y cyhoeddiad a wnaed ym mis Awst am y datblygiadau ar y tir, hoffem eich hysbysu chi am waith mireinio sydd wedi cael ei wneud ar elfennau alltraeth y prosiect.

Daw'r hysbysiad hwn yn dilyn y gwaith o gasglu a dadansoddi'r adborth a gawsom ni mewn ymateb i'n Hadroddiad Gwybodaeth Amgylcheddol Ragarweiniol (PEIR) yn ystod ein hymgynghoriad statudol diweddar. Mae'r cyhoeddiad hwn hefyd wedi'i lywio gan ein harolygon, asesiadau, ac astudiaethau technegol parhaus.

Mae'r cylchlythyr hwn yn tynnu sylw at y newidiadau sydd wedi cael eu gwneud i'r elfennau alltraeth, wrth i ni symud ymlaen tuag at gam nesaf y gwaith o ddatblygu ein cynlluniau a chyflwyno ein cais am Orchymyn Cydsyniad Datblygu yn 2024.

Ym mis Awst 2023 fe wnaethon ni gyhoeddi bod un lleoliad wedi'i ddewis ar gyfer yr is-orsaf ar y tir, i'w gynnwys yn ein cais am Orchymyn Cydsyniad Datblygu. Rydyn ni hefyd wedi dewis llwybr penodol ar gyfer y ceblau ar y tir, o'r opsiynau a gafodd eu cynnwys yn y PEIR. Ewch i'r adran Hyb Gwybodaeth ar www.morganandmona.com am ragor o fanylion.

Project update: Autumn 2023

Mona Offshore Wind Project array boundary to be reduced

As part of our ongoing work to develop plans for the Mona Offshore Wind Project, and following our onshore update announcement in August, we would like to announce a number of refinements to the offshore element of the scheme.

This announcement comes following the collation and analysis of the feedback that was submitted in response to our Preliminary Environmental Information Report (PEIR) during our recent statutory consultation. This announcement has also been informed by our ongoing surveys, assessments and technical studies.

This newsletter highlights where these offshore refinements to the project have been made, as we move to the next stage in the development of our plans and the submission of our Development Consent Order (DCO) application in 2024.

In August 2023 we announced that the project had selected a single onshore substation location for inclusion in our forthcoming DCO application. A single onshore cable route has also been selected from the options that were included in the PEIR. See the Information Hub section of **www.morganandmona.com** for more details.

Lleihau effeithiau posibl ar ddefnyddwyr morol

Drwy gydol y gwaith o ddatblygu Prosiect Gwynt Alltraeth Mona, rydyn ni wedi bod yn cynnal asesiadau er mwyn deall sut gallai safle'r fferm wynt effeithio ar ddiwydiannau a defnyddwyr morol eraill. Rydyn ni hefyd wedi bod yn gweithio'n agos gyda rhanddeiliaid i ddeall effeithiau posibly fferm wynt alltraeth arfaethedig, a sut gallwn ni weithio gyda'n gilydd i liniaru unrhyw effeithiau posibl.

Ar sail yr ymgysylltu hwn, ac yn dilyn yr adborth a gawsom ni yn ystod dau gam blaenorol o ymgynghoriad anstatudol yn 2022, rydyn ni hefyd yn ymwybodol bod yr effeithiau y gall Prosiect Gwynt Alltraeth Mona eu cael ar lwybrau fferi yn achosi pryder i bobl – yn unigol, ac wrth eu hystyried ochr yn ochr â datblygiadau eraill ym Môr Iwerddon.

Mae'r adborth a gawsom ni fel rhan o'n hymgynghoriad statudol a gynhaliwyd ar ein PEIR yn gynharach eleni, a rhagor o waith technegol, peirianyddol ac amgylcheddol, wedi cyfrannu at ein penderfyniad i leihau ardal yr aráe o'i chymharu â'r hyn a gyflwynwyd yn ein PEIR.

Rydyn ni'n credu y byddai hyn yn lleihau graddfa'r effaith y byddai Prosiect Gwynt Alltraeth Mona yn ei chael ar lwybrau fferi a defnyddwyr morol eraill ymhellach, ac yn lleihau effeithiau cronnol wrth ystyried y prosiect ochr yn ochr â datblygiadau eraill cyfagos. Rydyn ni wedi bod yn cydweithio â datblygwyr y prosiectau hyn ar y mater, er mwyn sicrhau dull gweithredu cydgysylltiedig. Bydd ardal yr aráe diwygiedig bellach i gyd o fewn ffin dyfroedd Cymru.

Er mwyn hyrwyddo cydfodolaeth â gweithgareddau pysgota, rydyn ni wedi ymrwymo i sicrhau ardal sy'n rhydd o dyrbinau gwynt a phlatfformau is-orsaf ar y môr. Rydyn ni hefyd wedi cynyddu'r pellter isaf a ganiateir rhwng pob darn o seilwaith o fewn ardal yr aráe. Mae hyn yn golygu ein bod ni wedi penderfynu cynyddu'r bwlch o 1000m rhwng pob rhes o dyrbinau gwynt, a'r bwlch o 875m rhwng pob tyrbin o fewn y rhesi hynny. Rydyn ni bellach yn cynnig y dylid cadw bwlch o 1400m o leiaf o fewn pob rhes a rhwng pob rhes. Bydd hyn yn rhoi rhagor o le i ddefnyddwyr morol deithio rhwng ac o amgylch ein fferm wynt.

Rydyn ni hefyd wedi ymrwymo i gadw dwy 'linell gyfeiriad' yn ardal yr aráe, a bydd ein rhesi o dyrbinau yn mynd o'r gogledd i'r de yn fras.

Credwn y bydd hyn yn cynorthwyo gyda diogelwch mordwyo, gweithgareddau

pysgota, a gwaith chwilio ac achub o fewn ardal yr aráe.

Disgwylir y bydd ein fferm wynt yn parhau i gynhyrchu 1.5 gigawat (GW)

Sylwer, nid yw'r ffaith ein bod ni'n lleihau maint ardal yr aráe yn golygu y bydd ein fferm wynt yn cynhyrchu llai o ynni. Rhagwelir o hyd y bydd gan Brosiect Gwynt Alltraeth Mona gapasiti cynhyrchu posibl o tua 1.5 gigawat (GW).

Rydyn ni hefyd wedi lleihau uchafswm nifer y tyrbinau o 107 i 96 (mae'r penderfyniad hwn yn seiliedig i raddau ar yr adborth a gawsom ni) yn ogystal â chynyddu diamedr rotor y tyrbin gwynt mwyaf o 280m i 320m.

Oherwydd cyflwr y tir, rydyn ni hefyd wedi penderfynu cael gwared â'r opsiwn o ddefnyddio sylfeini un postyn - ond rydyn ni'n dal yn ystyried yr opsiwn o ddefnyddio sylfeini disgyrchiant a / neu svlfeini siaced.

Cyn datblygu ein Datganiad Amgylcheddol a chyflwyno ein ceisiadau am Orchymyn Cydsyniad Datblygu a Thrwydded Forol y flwyddyn nesaf, byddwn ni'n parhau i gynnal asesiadau ac yn ymgysylltu â rhanddeiliaid cyn cyflwyno'r cais.

Reducing potential effects on marine users

Throughout the development of the Mona Offshore Wind Project, we have carried out assessments to understand how the wind farm site may impact other marine users and industries. Alongside this, we have been working closely with stakeholders to understand the potential impacts of the proposed offshore wind farm and how we can work together to mitigate any effects.

Through this engagement, and from the feedback we received during the two previous stages of non-statutory consultation held in 2022, we are also aware that the Mona Offshore Wind Project's potential effects on ferry routes is a concern for people – both individually and when considered alongside other developments in the Irish Sea.

Feedback received through the statutory consultation we held earlier this year on the Preliminary Environmental Information Report (PEIR), alongside further engineering, environmental and technical work, has informed our decision to reduce the array area from what was presented in our PEIR.

We believe that this further reduces the effect of the Mona Offshore Wind Project on ferry operators and other marine users, as well as reducing cumulative effects when considered alongside neighbouring developments. We've been working collaboratively with developers of these other projects on this issue to ensure a joined-up approach. The revised array area will now lie entirely in Welsh waters.

To promote co-existence with fishing activities, we are committing to maintaining an area that will be free of wind turbines and offshore substation platforms. Additionally, we have increased the minimum spacing between infrastructure within the array area. This means we have increased the spacing from 1000m between rows of wind turbines and 875m between each wind turbine in a row. We are now proposing minimum spaces of 1400m both within and between rows. This provides additional space for marine users to pass between and around our wind farm.

We are also committing to maintaining two 'lines of orientation' through the array area and our wind turbine rows will be orientated roughly north to south.

We believe this will further aid in the safety of marine navigation, fishing activities and search and rescue within the array area.

Our wind farm is still expected to generate 1.5 gigawatts (GW)

Importantly, reducing our array area doesn't mean our wind farm will generate less energy. The Mona Offshore Wind Project is still anticipated to have a potential generating capacity of approximately 1.5 gigawatts (GW).

We have also reduced the maximum number of turbines from 107 to 96 (this decision was partly made due to feedback received), and increased the rotor diameter of the largest wind turbine from 280m to 320m.

Additionally, due to ground conditions, we have removed the option of using monopile foundations – but the potential for using gravity base and / or jacket foundations remains.

Ahead of developing our Environmental Statement (ES) and submitting our Development Consent Order (DCO) and Marine License applications next year, we will continue to undertake assessments and engage with stakeholders prior to the submission of the application.

Arwynebedd Mona | Mona area

Dyfnder dŵr | Water depth

30-45m

Lleoliad | Location

o'r arfordir agosaf | from the nearest coast

Nodwch mai ystadegau dangosol vw'r rhai a ddarparwyd.

*Mae gan Brosiect Gwynt Alltraeth Mona y potensial i bweru'r hyn sydd gyfystyr â tua 1.5 miliwn o gartrefi.

Please note that the statistics provided are indicative.

*Mona Offshore Wind Project has the potential to power the equivalent of around 1.5 million homes.

Mona'n pweru | Mona powering

1.5 miliwn | million



Prosiect Gwynt Alltraeth Mona (Asedau Cynhyrchu), Ffin Safle Gostyngol

Prosiect Gwynt Alltraeth Mona (Asedau Cynhyrchu), Ffin Safle Blaenorol

Prosiect Gwynt Alltraeth Mona (Asedau Cynhyrchu), Ardal Chwilio Asedau Trawsyrru

Asedau Cynhyrchu Prosiect Gwynt Alltraeth Morgan, Ffin Safle Gostyngol

Asedau Cynhyrchu Prosiect Gwynt Alltraeth Morgan, Ffin Safle Blaenorol

Asedau Cynhyrchu Fferm Wynt Alltraeth Morecambe, Ffin Safle Gostyngol

Asedau Cynhyrchu Prosiect Gwynt Alltraeth Morgan, Ffin Safle Blaenorol

Ffermydd Gwynt Alltraeth Morgan a Morecambe: Asedau Trosglwyddo

Mona Offshore Wind Project (Generation Assets), Reduced Site Boundary

Mona Offshore Wind Project (Generation Assets), Previous Site Boundary

Mona Offshore Wind Project (Generation Assets), Transmission Assets Search Area

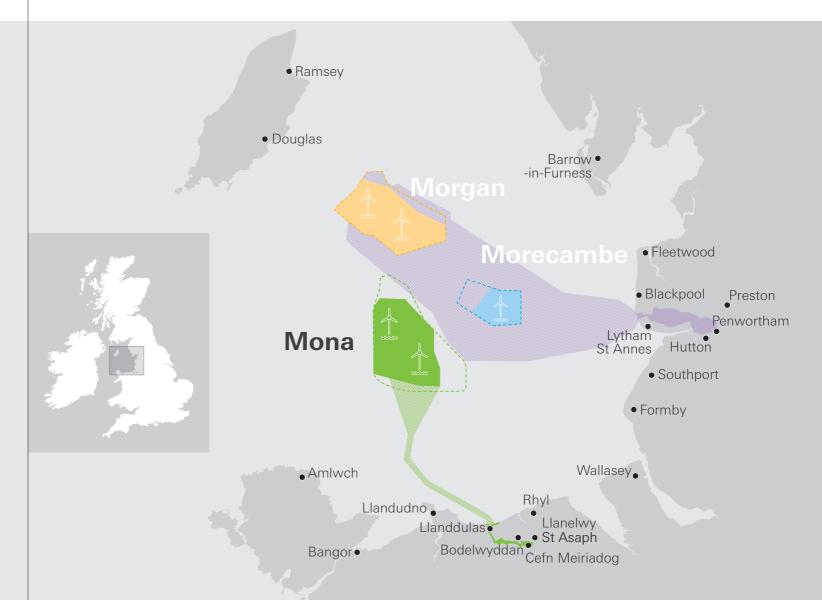
Morgan Offshore Wind Project Generation Assets, Reduced Site Boundary

Morgan Offshore Wind Project Generation Assets, Previous Site Boundary

Morecambe Offshore Windfarm Generation Assets, Reduced Site Boundary

Morecambe Offshore Windfarm Generation Assets, Previous Site Boundary

Morgan and Morecambe Offshore Wind Farms: Transmission Assets



Y camau nesaf

Y flwyddyn nesaf, rydyn ni'n bwriadu cyflwyno ein cais am gydsyniad datblygu i'r Arolygiaeth Gynllunio ar ran yr Ysgrifennydd Gwladol dros Ddiogelwch Ynni a Sero Net.

Os derbynnir y cais, bydd cam cyn-archwilio yn dechrau, gyda chyfleoedd i bobl gofrestru fel parti â diddordeb ar wefan yr Arolygiaeth Gynllunio a gwneud cais i gymryd rhan yn y broses archwilio.

Yna, bydd yr Arolygiaeth Gynllunio yn archwilio'r cais, gyda mewnbwn gan bartïon sydd â diddordeb ac ymgyngoreion statudol. Disgwylir i'r cyfnod archwilio fod yn uchafswm o chwe mis. Ar ôl yr archwiliad, bydd yr Arolygiaeth Gynllunio yn cyflwyno ei hargymhelliad i'r Ysgrifennydd Gwladol, a fydd wedyn yn penderfynu'n derfynol a ddylid rhoi caniatâd cynllunio i'r cais ai peidio.

Rydyn ni'n rhagweld y bydd penderfyniad terfynol yn cael ei wneud ar ein cais yn 2025. Os bydd y cais yn llwyddiannus, rydyn ni'n disgwyl dechrau'r gwaith adeiladu yn 2026 ar y cynharaf.

Yn y cyfamser, byddwn ni'n parhau i ymgysylltu â rhanddeiliaid ac yn cynnal rhagor o asesiadau technegol er mwyn datblygu'r prosiect gorau posibl.

Ymateb i'ch adborth chi

Rydyn ni wedi ystyried yr holl adborth a gyflwynwyd yn ystod ein hymgynghoriad. Byddwn ni'n cyhoeddi'r adborth hwn, ac unrhyw ymateb gan y prosiect, yn ein Hadroddiad Ymgynghori a fydd yn cael ei gyflwyno fel rhan o'n cais am Orchymyn Cydsyniad Datblygu.

Cofrestru i gael y wybodaeth ddiweddaraf

Bydd rhagor o gyfleoedd i ymgysylltu â'r prosiect ac i bobl leol gael dweud eu dweud pan fyddwn wedi cyflwyno'n cais am Orchymyn Cydsyniad Datblygu ac yn ystod y cam archwilio. Gall partïon sydd â diddordeb gofrestru i gael y wybodaeth ddiweddaraf ar wefan yr Arolygiaeth Gynllunio drwy

infrastructure.planninginspectorate.gov.uk/cy/

Next steps

We plan to submit our application for development consent to the Planning Inspectorate on behalf of the Secretary of State for Energy Security and Net Zero next year.

If our application is accepted, a pre-examination stage will begin, with opportunities for people to register as an interested party on the Planning Inspectorate's website and request to take part in the examination process.

The Planning Inspectorate will then examine the application, with input from interested parties and statutory consultees. The examination period is expected to be a maximum of six months. Following the examination, the Planning Inspectorate will present its recommendation to the Secretary of State, who will then make the final decision on whether the application should be granted planning consent.

We anticipate a final decision being made on our application in 2025. If the application is successful, we expect to start construction in 2026 at the earliest.

In the meantime, we will continue to engage with stakeholders and undertake further technical assessment to develop the best possible project.

Responding to your feedback

We have considered all the feedback that has been submitted during our consultation. We will publish this feedback, and any project responses, in our Consultation Report which will be submitted as part of our DCO application.

Register for updates

There will be further opportunities to engage with the project and for local people to have their say once we have submitted our DCO application and during the examination. Interested parties can register for updates on the Planning Inspectorate's website via infrastructure.planninginspectorate.gov.uk

Amserlen Ddangosol | Indicative timeline

Rydym ni yma | We are here



Gwanwyn 2023

Ail gam yr ymgynghoriad (statudol).

Spring 2023

Second stage of consultation (statutory).

2024

Ch1 2024

Cyflwyno ceisiadau ar gyfer Gorchymyn Cydsyniad Datblygu a thrwyddedau eraill.

Q1 2024

Applications submitted for Development Consent Order (DCO) and other licences.

2025

Disgwyl penderfyniad ar y Gorchymyn Cydsyniad Datblygu gan yr Ysgrifennydd Gwladol.

Expected decision on the DCO by the Secretary of State.

2026/7

Disgwyl y Penderfyniad Buddsoddi Terfynol a dechrau adeiladu.

Expected Final Investment Decision (FID) and commencement of construction.

2028/29

Dyddiad dechrau disgwyliedig – Dyddiad Gweithredu Masnachol.

Expected start – Commercial Operation Date (COD).

Cywir ar adeg ei chyhoeddi: Medi 2023. Nodwch mai amserlen ddangosol yw hon ac y gallai newid. Correct at time of publication: September 2023. Please note that this is an indicative timeline subject to change.





www.morganandmona.com



info@monaoffshorewind.com



FREEPOST MONA



0800 860 6263



Appendix F: Ongoing Engagement Activities and Statements of Common Ground

F.1. Ongoing engagement with stakeholders – host local authorities



F.1.1 Letter to Conwy Local Authority



Partners in UK offshore wind

Mona Offshore Wind Holdings Limited Chertsey Road, Sunbury On Thames Middlesex, TW16 7BP United Kingdom

Company number: 13497268

17 Tachwedd 2023

<u>Prosiect Gwynt Alltraeth Mona – mewnbwn gan Gyngor Bwrdeistref Sirol Conwy</u>

Yn dilyn ein sgyrsiau diweddar, rwy'n ysgrifennu atoch i roi'r wybodaeth ddiweddaraf i chi mewn nifer o feysydd lle byddai Prosiect Gwynt Alltraeth Mona yn croesawu mewnbwn ffurfiol gan Gyngor Bwrdeistref Sirol Conwy.

Mae'r rhain i gyd yn elfennau a fydd yn cael eu datblygu wrth i ni symud tuag at gyflwyno ein cais am Orchymyn Cydsyniad Datblygu (DCO) ddechrau 2024. Felly, byddwn yn ddiolchgar pe baech yn ystyried y pwyntiau canlynol ac yn cynghori ynghylch y ffordd orau o sicrhau mewnbwn gan yr awdurdod.

Cod Ymarfer Adeiladu

Fel y gwyddoch mae'n siŵr, mae'n ofynnol i ni baratoi Cod Ymarfer Adeiladu. Dyma ganllawiau sy'n ceisio nodi effeithiau tebygol ein gwaith adeiladu ac sy'n nodi'r safonau a'r protocolau a fydd yn helpu i leihau'r effeithiau hynny.

Wrth i ni geisio datblygu'r cynigion hyn, un agwedd lle byddem yn croesawu eich mewnbwn yw'r cynllun cyfathrebu. Bydd hyn yn pennu sut byddwn yn cyfleu newyddion i gymunedau lleol cyn ac yn ystod y gwaith adeiladu, gan eu helpu i ddeall y math o waith a pha mor hirhoedlog fydd y gwaith, a sut gallai effeithio arnynt. Rhowch wybod i ni beth yw'r ffordd orau o ymgysylltu â chi neu eich cydweithwyr yn y maes hwn ac os oes angen rhagor o arweiniad arnoch ynghylch y math o fewnbwn y gallai fod ei angen arnom, byddwn yn fwy na pharod i drafod hyn ymhellach.

Cynllun Sgiliau a Chyflogaeth

Yn yr un modd, rydym hefyd wrthi'n paratoi Cynllun Sgiliau a Chyflogaeth. Mae'r ddogfen hon yn nodi ein cynigion ar gyfer sicrhau bod Prosiect Gwynt Alltraeth Mona yn creu manteision amlwg i'r gymuned.

O ystyried maint a graddfa'r prosiect, rydym yn cydnabod y bydd angen i'r cynllun hwn fabwysiadu dull gweithredu cyfannol sy'n sicrhau manteision economaidd i'r rhanbarth dros y tymor byr, y tymor canolig a'r tymor hir. Rydym hefyd yn cydnabod bod gan Ogledd Cymru, a Chonwy'n benodol, hanes hir o gefnogi datblygiadau gwynt ar y môr a bod cyfleoedd i fanteisio ar y sgiliau a'r profiad presennol.

Byddem yn croesawu eich cyngor a'ch arweiniad ar y ffordd orau o fanteisio ar y sylfaen sgiliau leol honno.

Gallai hyn gynnwys argymhellion ynghylch trydydd partïon yr hoffech ein gweld ni'n ymgysylltu â nhw, mentrau

presennol y gallem gymryd rhan ynddynt neu fentrau newydd y gallem eu cefnogi o'r cychwyn cyntaf. Byddwn yn fwy na pharod i drafod yn fanylach petai hynny o gymorth i'ch ymateb.

Ein hymgynghoriad statudol diweddar a'n Datganiad Ymgynghori Cymunedol

Rydym bellach wedi cynnal tair rownd o ymgynghori. Roedd hyn yn cynnwys ymgynghoriad rhagarweiniol yn ystod haf 2022, ymgynghoriad wedi'i dargedu ar leoliadau is-orsafoedd posibl yn ystod hydref 2022 a'n hymgynghoriad terfynol statudol yn gynharach yn 2023. Rydym hefyd wedi cyhoeddi dwy rownd arall o gyfathrebu sy'n canolbwyntio ar y gymuned yn ystod y misoedd ers i'n hymgynghoriad statudol ddod i ben, gan nodi sut mae'r adborth a gafwyd wedi galluogi gwelliannau i elfennau ar y tir ac ar y môr yn ein prosiect.

Un ystyriaeth allweddol i chi fel awdurdod a fydd yn gartref i'r prosiect, fydd cadarnhau bod ymgynghoriad y prosiect wedi bod yn ddigonol. Rhan o hyn fydd cadarnhau ein bod wedi cynnal ein hymgynghoriad statudol yn unol â'r ymrwymiadau a nodir yn ein Datganiad Ymgynghori Cymunedol. Gallwch chi weld y newidiadau <u>yma</u>.

Ers i'n hymgynghoriad statudol ddod i ben, rydym wedi adolygu'r Datganiad Ymgynghori Cymunedol ac rydym wedi nodi ei fod yn crybwyll y byddai cerdyn post a chylchlythyr yn cael eu danfon i'r prif barth. Ystyriwyd y byddai anfon y ddwy ddogfen hyn yn ailadrodd y wybodaeth a ddarparwyd ac er mwyn osgoi dyblygu, dim ond cerdyn post fyddai ei angen.

Anfonwyd y cerdyn post hwn at 30,810 o gartrefi a busnesau ar draws yr hyn a ddiffiniwyd gennym yn y Datganiad Ymgynghori Cymunedol fel y prif barth ar gyfer ymgynghori. Roedd hyn yn adlewyrchu'r ardal y mae'r prosiect yn debygol o effeithio arni'n uniongyrchol. Roedd y cerdyn post yn cynnwys manylion yn cyhoeddi ein hymgynghoriad, dyddiadau perthnasol ar gyfer dechrau a gorffen, manylion cyswllt ar gyfer y prosiect ac anogaeth i'r rhai sy'n derbyn y cerdyn post, i ddysgu mwy am y cynigion a chyflwyno eu hadborth. Roedd map yn dangos lleoliad Prosiect Fferm Wynt Alltraeth Mona, ac roedd yn tynnu sylw at y lleoliadau lle byddem yn cynnal digwyddiadau ymgynghori.

Rydym yn cydnabod y dylai'r penderfyniad hwn i beidio ag anfon y cylchlythyr yn ogystal â'r cerdyn post fod wedi cael ei drafod a'i gytuno gyda chi, fel un o ymgyngoreion y Datganiad Ymgynghori Cymunedol.

Roeddem hefyd wedi nodi na chysylltwyd â nifer fach o grwpiau rhanddeiliaid fel sy'n cael eu rhestru yn Atodiadau'r Datganiad Ymgynghori Cymunedol ar adeg lansio'r ymgynghoriad, ac fe anfonwyd e-bost at nifer fach o ymgyngoreion a oedd yn 'bownsio'n ôl'. Ni ddaeth y prosiect o hyd i gyfeiriadau e-bost eraill, sy'n golygu y gallai'r rhanddeiliaid hynny fod yn rhai nad oeddent yn ymwybodol o'n hymgynghoriad. Rydym ni wedi cysylltu â'r bobl hyn, ac fe'u gwahoddwyd i roi adborth, a chynigiwyd cyfarfodydd iddynt i drafod y cynigion cyn rhoi eu hadborth.

Yn olaf, fe wnaethom nodi bod gwall technegol ar wefan ein hymgynghoriad yn golygu o bosibl na fydd ymatebion a gyflwynwyd i un o'r cwestiynau ar y fersiwn ar-lein o'n ffurflen adborth – sy'n ymwneud â'r 'effeithiau rhyng-gysylltiedig ar y môr' – wedi cael eu cofnodi. Yn dilyn hynny, fe wnaethom gysylltu â phawb a oedd wedi llenwi ffurflen ar-lein gan roi cyfle arall iddynt gyflwyno eu sylwadau i ymateb i'r cwestiwn hwnnw.

I gadarnhau, rydym ni wedi cysylltu â phob un o'r grwpiau hyn bellach ac mae pob un wedi cael 28 diwrnod arall i ystyried ein cynigion a rhoi adborth i'r prosiect.

Bydd yr holl adborth a ddaw i law gan y grwpiau hyn yn cael ei ystyried yn yr un ffordd â'r adborth a gasglwyd yn ystod yr ymgynghoriad statudol. Bydd hefyd yn cael ei gynnwys yn yr Adroddiad Ymgynghori, a fydd yn cael ei gyflwyno fel rhan o'n Gorchymyn Cydsyniad Datblygu.

Hoffem drafod y materion hyn ymhellach gyda chi i roi sicrwydd i chi am ein dull o ymgynghori. Hoffem hefyd gynnwys cadarnhad yn ein Hadroddiad Ymgynghori bod Cyngor Bwrdeistref Sirol Conwy o'r farn bod ein hymgynghoriad wedi bod yn ddigonol, a byddem yn ddiolchgar pe baech yn gallu ystyried a chadarnhau hyn yn ysgrifenedig.

Cytundeb Perfformiad Cynllunio (PPA)

Fel y gwyddoch, mae nifer o drafodaethau wedi cael eu cynnal gyda swyddogion ynghylch sefydlu Cytundeb Perfformiad Cynllunio. Gall y cytundeb hwn fod yn ddefnyddiol wrth drafod, wrth gytuno ar amserlenni ac wrth sicrhau bod yr awdurdod yn gallu dyrannu'r adnoddau sy'n debygol o fod eu hangen, heb effeithio ar gyflawni eich tasgau craidd o ddydd i ddydd. Byddem yn awyddus i fwrw ymlaen â'r trafodaethau hyn a byddem yn gwerthfawrogi eich arweiniad ar gymryd y camau nesaf mwyaf priodol.

Edrychaf ymlaen at eich ymateb i'r materion hyn a byddaf yn parhau i fod ar gael i gyfarfod ac i drafod unrhyw un, neu bob un o'r pwyntiau hyn, os oes angen rhagor o wybodaeth arnoch.

Yn gywir

Pennaeth Cyfathrebu a Materion Allannol

Dear

Mona Offshore Wind Project - input from Conwy County Borough Council

Further to our recent conversations, I'm writing to update you in a number of areas on which the Mona Offshore Wind Project would welcome formal input from Conwy County Borough Council.

These are all elements that will be developed as we move towards the submission of our Development Consent Order (DCO) application in early 2024. I would therefore be grateful if you would consider the following points and advise how best to secure input from the authority.

Code of Construction Practice (CoCP)

As you will no doubt be aware, we are required to prepare a Code of Construction Practice. This is a set of guidelines that seeks to identify the likely impacts of our construction work and sets out the standards and protocols which will help minimise those impacts.

As we seek to develop these proposals, one aspect where we would welcome your input is the communications plan. This will dictate how we will communicate news to local communities ahead of and during construction works, helping them to understand the type and longevity of the works and how they may be affected. Please let us know how best to engage you or your colleagues in this area and if you need further guidance on the type of input we may need, I would be happy to discuss further.

Skills and Employment Plan

Similarly, we are also preparing a Skills and Employment Plan. This document sets out our proposals for ensuring the Mona Offshore Wind Project creates demonstrable benefits for the community.

Given the size and scale of the project, we recognise this plan will need to take a holistic approach which delivers economic benefits for the region over the short, medium and long term. We also recognise that North Wales, and Conwy specifically, has a long history of supporting offshore wind development and that there are opportunities to plug into existing skills and experience.

Your advice and guidance on how best to tap into that local skill base would be welcome. This could include recommendations as to third parties you would like to see us engage, existing initiatives in which we could become involved or new initiatives that we may be able to support from inception. I would be happy to discuss in more detail if that would help aid your response.

Our recent statutory consultation and our Statement of Community Consultation (SoCC)

We have now conducted three rounds of consultation. This included an introductory consultation in the summer of 2022, a targeted consultation on potential sub-station locations in the autumn of 2022 and our final, statutory consultation earlier in 2023. We have also issued two further rounds of community-focused

communications in the months since the close of our statutory consultation, detailing how the feedback we've received has enabled refinements of both the onshore and offshore elements of our project.

A key consideration for you as a host authority will be confirming that the project's consultation has been adequate. Part of this will be confirming that we have conducted our statutory consultation in line with the commitments set out in our Statement of Community Consultation (SoCC). You can view this document here.

Since our statutory consultation concluded, we have reviewed the SoCC and we have identified that it mentions both a postcard and a newsletter would be delivered to the primary zone. Ultimately it was considered that to send both of these documents would be repeating the information provided and to avoid this duplication, only a postcard would be required.

This postcard was sent to 30,810 homes and businesses across what we defined in the SoCC as the primary zone for consultation. This reflected the area likely to be directly impacted by the project. The postcard included details announcing our consultation, relevant dates for the start and close, contact details for the project and encouragement for recipients to find out more about the proposals and submit their feedback. A map illustrated the location of the Mona Offshore Wind Farm Project and highlighted the locations where we would be holding consultation events.

We acknowledge this decision not to send the newsletter as well as the postcard should have been communicated, and agreed with you, as a SoCC consultee.

We also noted that a small number of stakeholder groups as listed in the Appendices of the SoCC were not contacted at consultation launch, and a small number of consultees were sent an email communication that 'bounced' back. Alternative email addresses were not sourced by the project, meaning those stakeholders could have been unaware of our consultation. These people have been contacted, invited to provide feedback and offered meetings to discuss the proposals ahead of providing their feedback.

Finally, we noted that a technical error on our consultation website meant that responses submitted to one of the questions on the online version of our feedback form – relating to 'the inter-related effects offshore' – may not have been captured. We subsequently contacted everybody who had completed an online form and gave them another opportunity to submit their comments in response to that question.

To confirm, all of these groups have now been contacted and all have been provided with a further 28 day period in which to consider our proposals and provide feedback for consideration by the project.

All feedback received from these groups will be considered in the same way as the feedback gathered during the statutory consultation. It will also be included within the Consultation Report, which will be submitted as part of our DCO.

We would like to discuss these matters with you further to reassure you of our approach to consultation. We would also like to include confirmation within our Consultation Report that Conwy County Borough Council

considers our consultation to have been adequate and we would be grateful if you are able to consider and confirm this point in writing.

Planning Performance Agreement (PPA)

As you're aware, there have been a number of discussions with officers in regard to the establishment of a Planning Performance Agreement. This agreement can be useful in focusing discussions, agreeing timescales and ensuring the authority can allocate the resources likely to be required without impacting the day to day delivery of your core tasks. We would be keen to progress these discussions further and would appreciate your guidance on taking the most appropriate next steps.

I look forward to your response on these matters and remain available to meet and discuss any and all of these points if you require further information.

Yours sincerely

Head of Communications & External Affairs



F.1.2 Letter Denbighshire Local Authority



Partners in UK offshore wind

Mona Offshore Wind Holdings Limited Chertsey Road, Sunbury On Thames Middlesex, TW16 7BP United Kingdom

Company number: 13497268

17 Tachwedd 2023

<u>Prosiect Gwynt Alltraeth Mona – mewnbwn gan Gyngor Sir Ddinbych</u>

Yn dilyn ein sgyrsiau diweddar, rwy'n ysgrifennu atoch i roi'r wybodaeth ddiweddaraf i chi mewn nifer o feysydd lle byddai Prosiect Gwynt Alltraeth Mona yn croesawu mewnbwn ffurfiol gan Gyngor Sir Ddinbych.

Mae'r rhain i gyd yn elfennau a fydd yn cael eu datblygu wrth i ni symud tuag at gyflwyno ein cais am Orchymyn Cydsyniad Datblygu (DCO) ddechrau 2024. Felly, byddwn yn ddiolchgar pe baech yn ystyried y pwyntiau canlynol a chynghori ynghylch y ffordd orau o sicrhau mewnbwn gan yr awdurdod.

Cod Ymarfer Adeiladu

Fel y gwyddoch mae'n siŵr, mae'n ofynnol i ni baratoi Cod Ymarfer Adeiladu. Dyma ganllawiau sy'n ceisio nodi effeithiau tebygol ein gwaith adeiladu ac sy'n nodi'r safonau a'r protocolau a fydd yn helpu i leihau'r effeithiau hynny.

Wrth i ni geisio datblygu'r cynigion hyn, un agwedd lle byddem yn croesawu eich mewnbwn yw'r cynllun cyfathrebu. Bydd hyn yn pennu sut byddwn yn cyfleu newyddion i gymunedau lleol cyn ac yn ystod y gwaith adeiladu, gan eu helpu i ddeall math a hirhoedledd y gwaith a sut gallai effeithio arnynt. Rhowch wybod i ni beth yw'r ffordd orau o ymgysylltu â chi neu eich cydweithwyr yn y maes hwn ac os oes angen rhagor o arweiniad arnoch ynghylch y math o fewnbwn y gallai fod ei angen arnom. Byddwn yn fwy na pharod i drafod hyn ymhellach.

Cynllun Sgiliau a Chyflogaeth

Yn yr un modd, rydym hefyd yn paratoi Cynllun Sgiliau a Chyflogaeth. Mae'r ddogfen hon yn nodi ein cynigion ar gyfer sicrhau bod Prosiect Gwynt Alltraeth Mona yn creu manteision amlwg i'r gymuned.

O ystyried maint a graddfa'r prosiect, rydym yn cydnabod y bydd angen i'r cynllun hwn fabwysiadu dull gweithredu cyfannol sy'n sicrhau manteision economaidd i'r rhanbarth dros y tymor byr, y tymor canolig a'r tymor hir. Rydym hefyd yn cydnabod bod gan Ogledd Cymru, a Sir Ddinbych yn benodol, hanes hir o gefnogi datblygiadau gwynt ar y môr a bod cyfleoedd i fanteisio ar y sgiliau a'r profiad presennol.

Byddem yn croesawu eich cyngor a'ch arweiniad ar y ffordd orau o fanteisio ar y sylfaen sgiliau leol honno.

Gallai hyn gynnwys argymhellion ynghylch trydydd partïon yr hoffech ein gweld ni'n ymgysylltu â nhw, mentrau presennol y gallem gymryd rhan ynddynt neu fentrau newydd y gallem eu cefnogi o'r cychwyn cyntaf. Byddwn yn fwy na pharod i drafod yn fanylach a fyddai hynny o gymorth i'ch ymateb.

Ein hymgynghoriad statudol diweddar a'n Datganiad Ymgynghori Cymunedol

Rydym bellach wedi cynnal tair rownd o ymgynghori. Roedd hyn yn cynnwys ymgynghoriad rhagarweiniol yn ystod haf 2022, ymgynghoriad wedi'i dargedu ar leoliadau is-orsafoedd posibl yn ystod hydref 2022 a'n hymgynghoriad terfynol statudol yn gynharach yn 2023. Rydym hefyd wedi cyhoeddi dwy rownd arall o gyfathrebu sy'n canolbwyntio ar y gymuned yn ystod y misoedd ers i'n hymgynghoriad statudol ddod i ben, gan nodi sut mae'r adborth rydym ni wedi'i gael wedi galluogi gwelliannau i elfennau ar y tir ac ar y môr yn ein prosiect.

Un ystyriaeth allweddol i chi fel awdurdod a fydd yn gartref i'r prosiect, fydd cadarnhau bod ymgynghoriad y prosiect wedi bod yn ddigonol. Rhan o hyn fydd cadarnhau ein bod wedi cynnal ein hymgynghoriad statudol yn unol â'r ymrwymiadau a nodir yn ein Datganiad Ymgynghori Cymunedol. Gallwch chi weld y newidiadau <u>yma</u>.

Ers i'n hymgynghoriad statudol ddod i ben, rydym wedi adolygu'r Datganiad Ymgynghori Cymunedol ac rydym wedi nodi ei fod yn crybwyll y byddai cerdyn post a chylchlythyr yn cael eu danfon i'r prif barth. Ystyriwyd y byddai anfon y ddwy ddogfen hyn yn ailadrodd y wybodaeth a ddarparwyd ac er mwyn osgoi dyblygu, dim ond cerdyn post fyddai ei angen.

Anfonwyd y cerdyn post hwn at 30,810 o gartrefi a busnesau ar draws yr hyn a ddiffiniwyd gennym yn y Datganiad Ymgynghori Cymunedol fel y prif barth ar gyfer ymgynghori. Roedd hyn yn adlewyrchu'r ardal y mae'r prosiect yn debygol o effeithio arni'n uniongyrchol. Roedd y cerdyn post yn cynnwys manylion yn cyhoeddi ein hymgynghoriad, dyddiadau perthnasol ar gyfer dechrau a gorffen, manylion cyswllt ar gyfer y prosiect ac anogaeth i'r rhai sy'n derbyn y cerdyn post, i ddysgu mwy am y cynigion a chyflwyno eu hadborth. Roedd map yn dangos lleoliad Prosiect Fferm Wynt Alltraeth Mona, a oedd yn tynnu sylw at y lleoliadau lle byddem yn cynnal digwyddiadau ymgynghori.

Rydym yn cydnabod y dylai'r penderfyniad hwn i beidio ag anfon y cylchlythyr yn ogystal â'r cerdyn post fod wedi cael ei drafod a'i gytuno gyda chi, fel ymgynghorai Datganiad Ymgynghori Cymunedol.

Roeddem hefyd wedi nodi na chysylltwyd â nifer fach o grwpiau rhanddeiliaid fel sy'n cael eu rhestru yn Atodiadau'r Datganiad Ymgynghori Cymunedol ar adeg lansio'r ymgynghoriad, ac fe anfonwyd e-bost at nifer fach o ymgyngoreion a oedd yn 'bownsio' yn ôl. Ni ddaeth y prosiect o hyd i gyfeiriadau e-bost eraill, sy'n golygu y gallai'r rhanddeiliaid hynny fod wedi bod yn anymwybodol o'n hymgynghoriad. Rydym ni wedi cysylltu â'r bobl hyn, ac fe'u gwahoddwyd i roi adborth, a chynigiwyd cyfarfodydd iddynt i drafod y cynigion cyn rhoi eu hadborth.

Yn olaf, fe wnaethom nodi bod gwall technegol ar wefan ein hymgynghoriad yn golygu efallai na fydd ymatebion a gyflwynwyd i un o'r cwestiynau ar y fersiwn ar-lein o'n ffurflen adborth – sy'n ymwneud â'r 'effeithiau rhyng-gysylltiedig ar y môr' – wedi cael eu cofnodi. Yn dilyn hynny, fe wnaethom gysylltu â phawb a oedd wedi llenwi ffurflen ar-lein a rhoi cyfle arall iddynt gyflwyno eu sylwadau mewn ymateb i'r cwestiwn hwnnw.

I gadarnhau, rydym ni wedi cysylltu â phob un o'r grwpiau hyn bellach ac mae pob un wedi cael 28 diwrnod arall i ystyried ein cynigion a rhoi adborth i'r prosiect.

Bydd yr holl adborth a ddaw i law gan y grwpiau hyn yn cael ei ystyried yn yr un ffordd â'r adborth a gasglwyd yn ystod yr ymgynghoriad statudol. Bydd hefyd yn cael ei gynnwys yn yr Adroddiad Ymgynghori, a fydd yn cael ei gyflwyno fel rhan o'n Gorchymyn Cydsyniad Datblygu.

Hoffem drafod y materion hyn ymhellach gyda chi i'ch sicrhau ynghylch ein dull o ymgynghori. Hoffem hefyd gynnwys cadarnhad yn ein Hadroddiad Ymgynghori bod Cyngor Sir Ddinbych o'r farn bod ein hymgynghoriad wedi bod yn ddigonol, a byddem yn ddiolchgar pe baech yn gallu ystyried a chadarnhau hyn yn ysgrifenedig.

Cytundeb Perfformiad Cynllunio (PPA)

Fel y gwyddoch, mae nifer o drafodaethau wedi cael eu cynnal gyda swyddogion ynghylch sefydlu Cytundeb Perfformiad Cynllunio. Gall y cytundeb hwn fod yn ddefnyddiol wrth drafod, wrth gytuno ar amserlenni ac wrth sicrhau bod yr awdurdod yn gallu dyrannu'r adnoddau sy'n debygol o fod eu hangen, heb effeithio ar gyflawni eich tasgau craidd o ddydd i ddydd. Byddem yn awyddus i fwrw ymlaen â'r trafodaethau hyn a byddem yn gwerthfawrogi eich arweiniad ar gymryd y camau nesaf mwyaf priodol.

Edrychaf ymlaen at eich ymateb i'r materion hyn a byddaf yn parhau i fod ar gael i gyfarfod ac i drafod unrhyw un, neu bob un o'r pwyntiau hyn, os oes angen rhagor o wybodaeth arnoch.

Yn gywir

Pennaeth Cyfathrebu a Materion Allannol

Dear

Mona Offshore Wind Project - input from Denbighshire County Council

Further to our recent conversations, I'm writing to update you in a number of areas on which the Mona Offshore Wind Project would welcome formal input from Denbighshire County Council.

These are all elements that will be developed as we move towards the submission of our Development Consent Order (DCO) application in early 2024. I would therefore be grateful if you would consider the following points and advise how best to secure input from the authority.

Code of Construction Practice (CoCP)

As you will no doubt be aware, we are required to prepare a Code of Construction Practice. This is a set of guidelines that seeks to identify the likely impacts of our construction work and sets out the standards and protocols which will help minimise those impacts.

As we seek to develop these proposals, one aspect where we would welcome your input is the communications plan. This will dictate how we will communicate news to local communities ahead of and during construction works, helping them to understand the type and longevity of the works and how they may be affected. Please let us know how best to engage you or your colleagues in this area and if you need further guidance on the type of input we may need, I would be happy to discuss further.

Skills and Employment Plan

Similarly, we are also preparing a Skills and Employment Plan. This document sets out our proposals for ensuring the Mona Offshore Wind Project creates demonstrable benefits for the community.

Given the size and scale of the project, we recognise this plan will need to take a holistic approach which delivers economic benefits for the region over the short, medium and long term. We also recognise that North Wales, and Denbighshire specifically, has a long history of supporting offshore wind development and that there are opportunities to plug into existing skills and experience.

Your advice and guidance on how best to tap into that local skill base would be welcome. This could include recommendations as to third parties you would like to see us engage, existing initiatives in which we could become involved or new initiatives that we may be able to support from inception. I would be happy to discuss in more detail if that would help aid your response.

Our recent statutory consultation and our Statement of Community Consultation (SoCC)

We have now conducted three rounds of consultation. This included an introductory consultation in the summer of 2022, a targeted consultation on potential sub-station locations in the autumn of 2022 and our final, statutory consultation earlier in 2023. We have also issued two further rounds of community-focused

communications in the months since the close of our statutory consultation, detailing how the feedback we've received has enabled refinements of both the onshore and offshore elements of our project.

A key consideration for you as a host authority will be confirming that the project's consultation has been adequate. Part of this will be confirming that we have conducted our statutory consultation in line with the commitments set out in our Statement of Community Consultation (SoCC). You can view this document here.

Since our statutory consultation concluded, we have reviewed the SoCC and we have identified that it mentions both a postcard and a newsletter would be delivered to the primary zone. Ultimately it was considered that to send both of these documents would be repeating the information provided and to avoid this duplication, only a postcard would be required.

This postcard was sent to 30,810 homes and businesses across what we defined in the SoCC as the primary zone for consultation. This reflected the area likely to be directly impacted by the project. The postcard included details announcing our consultation, relevant dates for the start and close, contact details for the project and encouragement for recipients to find out more about the proposals and submit their feedback. A map illustrated the location of the Mona Offshore Wind Farm Project and highlighted the locations where we would be holding consultation events.

We acknowledge this decision not to send the newsletter as well as the postcard should have been communicated, and agreed with you, as a SoCC consultee.

We also noted that a small number of stakeholder groups as listed in the Appendices of the SoCC were not contacted at consultation launch, and a small number of consultees were sent an email communication that 'bounced' back. Alternative email addresses were not sourced by the project, meaning those stakeholders could have been unaware of our consultation. These people have been contacted, invited to provide feedback and offered meetings to discuss the proposals ahead of providing their feedback.

Finally, we noted that a technical error on our consultation website meant that responses submitted to one of the questions on the online version of our feedback form – relating to 'the inter-related effects offshore' – may not have been captured. We subsequently contacted everybody who had completed an online form and gave them another opportunity to submit their comments in response to that question.

To confirm, all of these groups have now been contacted and all have been provided with a further 28 day period in which to consider our proposals and provide feedback for consideration by the project.

All feedback received from these groups will be considered in the same way as the feedback gathered during the statutory consultation. It will also be included within the Consultation Report, which will be submitted as part of our DCO.

We would like to discuss these matters with you further to reassure you of our approach to consultation. We would also like to include confirmation within our Consultation Report that Denbighshire County Council

considers our consultation to have been adequate and we would be grateful if you are able to consider and confirm this point in writing.

Planning Performance Agreement (PPA)

As you're aware, there have been a number of discussions with officers in regard to the establishment of a Planning Performance Agreement. This agreement can be useful in focusing discussions, agreeing timescales and ensuring the authority can allocate the resources likely to be required without impacting the day to day delivery of your core tasks. We would be keen to progress these discussions further and would appreciate your guidance on taking the most appropriate next steps.

I look forward to your response on these matters and remain available to meet and discuss any and all of these points if you require further information.

Yours sincerely

Head of Communications & External Affairs