

# MONA OFFSHORE WIND PROJECT

## Applicant's Response to Relevant Representations

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Image of an offshore wind farm

**MONA OFFSHORE WIND PROJECT**

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## MONA OFFSHORE WIND PROJECT

### Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Bodelwyddan National Grid Substation	This is the Point of Interconnection (POI) selected by the National Grid for the Mona Offshore Wind Project.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Mona Offshore Wind Project.
Evidence Plan Process	The Evidence Plan process is a mechanism to agree upfront what information the Applicant needs to supply to the Planning Inspectorate as part of the Development Consent Order (DCO) applications for the Mona Offshore Wind Project.
Expert Working Group (EWG)	Expert working groups set up with relevant stakeholders as part of the Evidence Plan process.
Inter-array cables	Cables which connect the wind turbines to each other and to the offshore substation platforms. Inter-array cables will carry the electrical current produced by the wind turbines to the offshore substation platforms.
Interconnector cables	Cables that may be required to interconnect the Offshore Substation Platforms in order to provide redundancy in the case of cable failure elsewhere.
Intertidal access areas	The area from Mean High Water Springs (MHWS) to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities.
Intertidal area	The area between MHWS and MLWS.
Landfall	The area in which the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling.
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process. In addition, licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).
Maximum Design Scenario (MDS)	The scenario within the design envelope with the potential to result in the greatest impact on a particular topic receptor, and therefore the one that should be assessed for that topic receptor.
Mona 400kV Grid Connection Cable Corridor	The corridor from the Mona onshore substation to the National Grid substation at Bodelwyddan.
Mona Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, offshore export cables and offshore

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Term	Meaning
	substation platforms (OSPs) forming part of the Mona Offshore Wind Project will be located.
Mona Array Scoping Boundary	The Preferred Bidding Area that the Applicant was awarded by The Crown Estate as part of Offshore Wind Leasing Round 4.
Mona Offshore Cable Corridor	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located.
Mona Offshore Cable Corridor and Access Areas	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located and in which the intertidal access areas are located.
Mona Offshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area encompassing and located between the Mona Potential Array Area and the landfall up to MHWS, in which the offshore export cables will be located.
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
Mona Offshore Wind Project Boundary	The area containing all aspects of the Mona Offshore Wind Project, both offshore and onshore.
Mona Offshore Wind Project PEIR	The Mona Offshore Wind Project Preliminary Environmental Information Report (PEIR) that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Offshore Wind Project Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Onshore Cable Corridor	The corridor between MHWS at the landfall and the Mona onshore substation, in which the onshore export cables will be located.
Mona Onshore Development Area	The area in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid substation will be located
Mona Onshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area located between MHWS at the landfall and the onshore National Grid substation, in which the onshore export cables, onshore substation and other associated onshore transmission infrastructure will be located.
Mona PEIR Offshore Cable Corridor	The corridor presented at PEIR that was consulted on during statutory consultation and has subsequently been refined for the application for Development Consent. It is located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables and the offshore booster substation will be located.
Mona PEIR Offshore Wind Project Boundary	The area presented at PEIR containing all aspects of the Mona Offshore Wind Project, both offshore and onshore. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Potential Array Area	The area that was presented in the Mona Scoping Report and in the PEIR as the area within which the wind turbines, foundations, meteorological mast, inter-array cables, interconnector cables, offshore export cables and OSPs forming part of the Mona Offshore Wind Project were likely to be located. This area was the boundary consulted



## MONA OFFSHORE WIND PROJECT

Term	Meaning
	on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Proposed Onshore Development Area	The area presented at PEIR in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid infrastructure will be located. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
National Policy Statement (NPS)	The current national policy statements published by the Department for Energy Security & Net Zero in 2024.
Non-statutory consultee	Organisations that an applicant may choose to consult in relation to a project who are not designated in law but are likely to have an interest in the project.
Offshore Substation Platform (OSP)	The offshore substation platforms located within the Mona Array Area will transform the electricity generated by the wind turbines to a higher voltage allowing the power to be efficiently transmitted to shore.
Offshore Wind Leasing Round 4	The Crown Estate auction process which allocated developers preferred bidder status on areas of the seabed within Welsh and English waters and ends when the Agreements for Lease (Afls) are signed.
Pre-construction site investigation surveys	Pre-construction geophysical and/or geotechnical surveys undertaken offshore and, or onshore to inform, amongst other things, the final design of the Mona Offshore Wind Project.
Point of Interconnection	The point of connection at which a project is connected to the grid. For the Mona Offshore Wind Project, this is the Bodelwyddan National Grid Substation.
Relevant Local Planning Authority	The Relevant Local Planning Authority is the Local Authority in respect of an area within which a project is situated, as set out in Section 173 of the Planning Act 2008. Relevant Local Planning Authorities may have responsibility for discharging requirements and some functions pursuant to the DCO, once made.
the Secretary of State for Business, Energy and Industrial Strategy	The decision maker with regards to the application for development consent for the Mona Offshore Wind Project.
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to the Planning Act 2008 in relation to an application for development consent. Not all consultees will be statutory consultees (see non-statutory consultee definition).
Wind turbines	The wind turbine generators, including the tower, nacelle and rotor.
The Planning Inspectorate	The agency responsible for operating the planning process for NSIPs.

## MONA OFFSHORE WIND PROJECT

### Acronyms

Acronym	Description
AfL	Agreement for Lease
BEIS	Department for Business, Energy and Industrial Strategy
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
HVAC	High Voltage Alternating Current
IEMA	Institute for Environmental Management and Assessment
ISAA	Information to support the Appropriate Assessment
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
NRW	Natural Resources Wales
NSIP	Nationally Significant Infrastructure Project
NTS	Non-Technical Summary
OSP	Offshore Substation Platform
PDE	Project Design Envelope
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
POI	Point of Interconnection
SoCC	Statement of Community Consultation
TCE	The Crown Estate

### Units

Unit	Description
GW	Gigawatt
km	Kilometres
km <sup>2</sup>	Kilometres squared
kV	Kilovolt
MW	Megawatt
nm	Nautical miles

# 1 Applicant's response to Relevant Representations

## 1.1 Introduction

1.1.1.1 Following closure of the relevant representation period under Section 56 of the Planning Act 2008 for the Mona Offshore Wind farm (the Applicant), the Applicant has taken the opportunity to review each of the Relevant Representations (RRs) received from stakeholders who registered as Interested Parties in the examination.

1.1.1.2 Details of the Applicant's response to each of those RRs received are set out in the subsequent sections of this document and its annexes.

1.1.1.3 The Applicant has numbered the RRs in line with the Planning Inspectorate's document library, with subsequent paragraph number e.g. RR-001.1, RR-001.2 etc.

1.1.1.4 A total of 90 RRs were made during the representation period. The Planning Inspectorate received two responses from stakeholders confirming that they did not wish to register as Interested Parties in the examination:

- The Coal Authority
- Westmorland and Furness Council

## 2 RESPONSES TO RELEVANT REPRESENTATIONS

### 2.1 ANIFPO

Table 2.1: RR-001 – ANIFPO

Reference	Relevant Representation Comment	Applicant's response
RR-001.1	I wish to be kept inform of developments as a representative of the Northern Irish fishing fleet. We as an industry are under continually spatial squeeze which is compounded by Windfarm developments, therefore I feel it is essential that we as an industry have a representation.	<p>Noted. 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 to understand stakeholder requirements for co-existence 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 (APP-199), and is secured through the deemed marine licence (Schedule 14 of the DCO, condition 18) and is expected to be secured in the separate marine licences. Mitigation and monitoring commitments are set out within the environmental statement chapters and the Mitigation and monitoring schedule (Document Reference APP-196).</p> <p>Enabling co-existence and indeed, co-location was a key aim underpinning the Applicant's commitments to not close the entire development area during construction, the scallop mitigation zone (SMZ) and the orientation and spacing of infrastructure. Fishing receptor groups will be able to continue fishing within parts of the Mona Array Area and Mona Offshore Cable Corridor during construction. During the operations and maintenance phase, the measures adopted as part of the Mona Offshore Wind Project such as the SMZ, minimum infrastructure spacing of 1,400 m and roughly north-to-south alignment of wind turbine rows (as set out in APP-199), will provide the space for continued fishing within the Mona Array Area and the Mona Offshore Cable Corridor, and fishing vessels will be able to transit through these areas.</p>

## 2.2 Ann Conway

Table 2.2: RR-002 – Ann Conway

Reference	Relevant Representation Comment	Applicant's response
RR-002.1	<p>I oppose this plan in Benllech, an area of outstanding natural beauty as it will spoil the view and may also have a knock on effect on tourism bringing money into the area. It will also affect the natural habitat in the sea, counterproductive to any eco friendly benefits it purports to have.</p>	<p>Volume 2, Chapter 8: Seascape and visual resources (APP-60) presents an assessment of the potential impact of the Mona Offshore Wind Project on seascape and visual resources, comprising a Seascape Landscape and Visual Impact Assessment (SLVIA), for the construction, operation and decommissioning phases of the Project.</p> <p>The SLVIA is based on a Zone of Theoretical Visibility (ZTV). The ZTV extends 50km from the Mona Array Area (extended to 60 km to assess effects on nationally and internationally designated landscapes), and includes Benllech, at c.37 km to the closet point of the Mona Array Area. The assessment utilises seascape visualisations, with a daytime and nighttime view presented from Benllech (see Volume 6, Annex 8.6: Seascape visualisations Part 3 (Figures 18.1 - 27.2- APP-108).</p> <p>The SLVIA concludes that the potential seascape, landscape and visual effects at Benllech will be minor to moderate adverse (not significant in EIA terms)</p> <p>The Applicant's environmental statement also includes an assessment of the potential impact of the proposed development on socio-economics, including tourism, in Volume 4, Chapter 3: Socio-economics (APP-077).</p> <p>The assessment of potential impacts on tourism includes assessing the potential indirect impacts from the proposed development associated with visual amenity, overnight accommodation, and recreation on tourism. The study area includes North Wales, North West England and the Isle of Man, and includes baseline information on the visitor economy in these regions.</p> <p>The socioeconomic assessment notes (para 3.4.3.15 Volume 4, Chapter 3: Socio-economics (APP-077)) that potential visual impacts of the construction, operations and maintenance, and decommissioning of the Mona Offshore Wind Project will be one of the most important considerations when assessing significance of effects on tourism.</p> <p>For each of the tourism study areas, North Wales, North West England and Isle of Man, the assessment concludes that whilst the sensitivity of the receptors is high, the magnitude of impact is deemed to be negligible, so the affect will be of Minor (adverse) significance, which is not significant in EIA terms.</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>Potential impacts on the marine ecological environment are presented in Volume 2, Chapters 1 to 5 (APP-053 to APP-075). With the exception of the potential impact of underwater sound on harbour porpoise and herring the assessments concluded that there was no potential for significant effect on the marine ecological environment from the Project alone. The Applicant has committed to developing an Underwater Sound Management Strategy (UWSMS) [APP-202] to address any residual impacts from underwater sound so that they are reduced to not-significant. The outline UWMS (APP-202) will be developed further post-consent, in consultation with NRW, when further project design details are available.</p>

## 2.3 Awel y Môr Offshore Wind Farm Limited

Table 2.3: RR-003 – Awel y Môr Offshore Wind Farm Limited

Reference	Relevant Representation Comment	Applicant's response
RR-003.1	<p>1. Awel y Môr Offshore Wind Farm Limited is the developer of the Awel y Môr Offshore Wind Farm project (AyM). AyM was consented by way of a development consent order made by the Secretary of State for Energy Security and Net Zero on 19 September 2023, pursuant to which Awel y Môr Offshore Wind Farm Limited is the undertaker with powers to construct and operate AyM.</p> <p>2. Awel y Môr Offshore Wind Farm Limited is also the holder of an electricity generation licence granted by Ofgem on 28 January 2021.</p> <p>3. The proposed onshore Order limits for the Mona Offshore Wind project (MOWP) overlap significantly with the Order limits for AyM in the vicinity of the proposed connection points for both projects to the National Grid substation at Bodelwyddan, as described in more detail below.</p> <p>4. The proposed offshore export cable corridor for MOWP also crosses the area over which AyM holds an agreement for lease from The Crown Estate.</p> <p>5. The MOWP proposals will also have other interactions with AyM offshore, including potential construction and operational-related interfaces and impacts.</p> <p>6. This relevant representation outlines the main issues which Awel y Môr Offshore Wind Farm Limited identifies are required to be considered as part of the examination of the MOWP proposals in relation to the overlap between the projects, and the measures which are required to ensure that the delivery of AyM is not impaired by the MOWP proposals.</p> <p>7. The proposed MOWP Work Nos. 25 and 26, shown on the Works Plan – Onshore (examination library reference: APP-008) and described in the MOWP draft development consent order (DCO) (examination library reference: APP-</p>	<p>Awel y Môr Offshore Wind Farm Limited's comments are noted.</p> <p>Detailed discussions regarding adequate protection of Awel y Môr Offshore Wind Farm Limited's assets are ongoing.</p> <p>Information on interactions with the Mona Offshore Wind Project is being shared with Awel y Môr Offshore Wind Farm Limited to facilitate the ongoing discussions and negotiations in relation to the protective provisions.</p> <p>The Applicant expects the relevant documentation will be agreed before the close of the Examination.</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>023) overlap with Work Nos. 36, 39, 39A and 40 as authorised by The Awel y Môr Offshore Wind Farm Order. In addition, MOWP Work Nos. 30 and 38 (permanent access) overlap with Work Nos. 39 and 41 of the AyM consent.</p> <p>8. Proposed MOWP Work No. 25 includes the installation of cables and a temporary construction compound (TCC). As was highlighted in Awel y Môr Offshore Wind Farm Limited's statutory consultation response on the MOWP proposals dated 26th May 2023, any proposals to locate a TCC or cables within the AyM DCO boundary and/or above the installed 400kV cable of AyM require further detailed consideration. In particular, Awel y Môr Offshore Wind Farm Limited would seek assurance from MOWP that both parties will look to avoid crossing each other's cables.</p> <p>9. The MOWP draft development consent order would also confer powers of compulsory acquisition and temporary possession over these areas and Awel y Môr Offshore Wind Farm Limited would object to the grant of those powers without appropriate protections for AyM.</p> <p>10. In the light of these interactions, it will be necessary for the development consent order for MOWF to include protective provisions for the benefit of AyM. Awel y Môr Offshore Wind Farm Limited is discussing these matters with MOWP and will continue dialogue with MOWP to ensure that the MOWP proposals do not adversely affect AyM.</p> <p>11. Awel y Môr Offshore Wind Farm Limited therefore wishes to register as an Interested Party for the examination of MOWP and would be happy to participate further in the examination to assist the Examining Authority in understanding the interaction between the AyM and MOWP projects and the necessary protections required for AyM.</p>	



## 2.4 Barrow Offshore Wind Limited

**Table 2.4: RR-004 – Barrow Offshore Wind Limited**

Reference	Relevant Representation Comment	Applicant's response
RR-004.1	<p>Barrow Offshore Wind Limited owns the Barrow Offshore Windfarm, an operational offshore windfarm with a s36 Electricity Act 1989 consent and relevant marine licences ("our Development"). Its proximity to Mona Offshore Wind Farm ("MOWF") can be seen in MOWF's Environmental Statement (the "ES") (F2.10 Figure 10.4 and Table 10.10). Our Development does not object to the principle of MOWF. We do, however, wish to participate in the DCO Examination to make representations about the potential impacts on and interactions with our Development and, where appropriate, to secure appropriate mitigations.</p>	<p>The Applicant notes your response. Barrow Offshore Windfarm is a minimum of 43.3 km from Mona Offshore Wind Project as stated in Table 10.10 of Volume 2, Chapter 10: Other sea users (APP-062).</p>
RR-004.2	<p>Concerns were previously highlighted to MOWF via a s48 consultation response and subsequent meeting. Our concerns as raised in the s48 response remain extant and we expect further meaningful engagement to seek to address the issues raised below and previously. We are open to addressing such matters within or outside the Examination process.</p>	<p>The Barrow Offshore Wind farm is considered as part of the baseline in Volume 2, Chapter 10: Other sea users (APP-062), and has been considered in the cumulative screening for each topic where appropriate. Engagement has occurred with Barrow Offshore Wind Limited during the pre-application phase of the Mona Offshore Wind Project and will continue as required throughout the examination phase.</p>
RR-004.3	<p>Our Development expects to continue to operate and be maintained in the long-term. It may be upgraded and repowered in future, and will then be decommissioned. Co-existence with our Development must be considered and protected over the long-term – and the acceptability of cumulative and in-combination impacts – must be properly assessed taking into account each of the above stages of our Development's life. Our Development requires that its operations, consents (including conditions), and any stakeholder agreements entered into by it are unaffected by MOWF. Our Development's concerns include the following.</p>	<p>An impact assessment, including the potential impact on the possible reduction or restriction of other offshore energy activities as a result of the Mona Offshore Wind Project, is presented in Volume 2, Chapter 10: Other sea users (APP-062). The scope of potential impacts, as set out in Table 10.6 of Volume 2, Chapter 10: Other sea users (APP-062), has been developed in consultation with relevant statutory and non-statutory stakeholders throughout the pre-application phase, which included consideration of matters raised in the section 42 consultation response from Barrow Offshore Wind Limited. Potential impacts have been appropriately assessed in accordance with the process set out in Volume 1, Chapter 5: Environmental Impact Assessment methodology (APP-052). No adverse impacts were assessed as significant in Environmental Impact Assessment (EIA) terms.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-004.4	<p>Issue one: The ES highlights potential significant impacts on wildlife features, including potential significant project-alone and in-combination impacts on marine mammals (F2.4). We are not convinced that the baseline and the predicted impacts are robust and align with our understanding of the local environment and we require to analyse this further. Future impacts of our Development, such as operation and maintenance, must be accounted for by MOWF and appropriate mechanisms must be put in place to facilitate co-existence and allow co-ordination to reduce potential cumulative or in-combination impacts.</p>	<p>As set out in Table 10.16 of Volume 2, Chapter 10: Other sea users (APP-062) the Mona Offshore Wind Project has committed to continued consultation through the life of the project, as required, with other offshore energy operators to minimise disruption to either party's operations and maximise coexistence.</p> <p>The Mona Offshore Wind Project has undertaken a robust assessment of all potential impacts on marine wildlife informed by appropriate data sources from site specific surveys and detailed desktop studies, in accordance with relevant topic specific guidance. The assessment of potential impact to marine wildlife is presented four chapters: Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), Volume 2, Chapter 4: Marine mammals (APP-056) and Volume 2, Chapter 5: Offshore ornithology (APP-057).</p> <p>The evidence to inform the baseline and the approach to predicting effects on marine mammals were discussed and agreed through an Evidence Plan Process which included an Expert Working Group (EWG) for marine mammals as set out in section 4.5 of the Consultation Report (APP-037). To inform the Environmental Statement, site-specific surveys were undertaken, as agreed with the marine mammal EWG, across the Mona Array Area plus a buffer extending between 7 to 16.5 km. Further, and on advice from the marine mammal EWG, additional data sources and informative documents were identified post-scoping that were used to inform the baseline characterisation. All suggested data sources have been included in the baseline (Volume 6, Annex 4.1: Marine mammal technical report (APP-090)). The Applicant is therefore confident that the assessment of likely significant effects on marine mammals presented in Volume 2, Chapter 4: Marine mammals (APP-056) is based on the most scientifically robust evidence available and that sufficient precaution is built into the assessment. With respect to potential cumulative or in-combination effects, the assessment has considered all reasonably foreseeable (i.e. those with information in the public domain) projects, plans and activities.</p> <p>The Underwater sound management strategy (with Outline underwater sound management strategy included as part of the application, (APP-202)) will reduce the Mona Offshore Wind Project's contributions to the cumulative assessment, if required, post consent. Requirements for management measures and mitigation will be discussed in consultation with the licensing authority and statutory nature conservation bodies (SNCBs).</p> <p>As outlined in Volume 2, Chapter 10: Other sea users (APP-062) the Mona Offshore Wind Project has committed to consultation with other offshore energy</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-004.5	Issue two: The ES highlights extensive impacts on shipping and navigation and commits to stakeholder engagement (F2.7 7.14.1.2-7.14.1.4). We require to be involved in such engagement to ensure that our consents, agreements, and operations are not adversely affected by MOWF.	<p>operators to minimise disruption to either party's operations and maximise coexistence.</p> <p>The Applicant notes that Barrow Offshore Wind Farm is located more than 23 nm to the northeast of the Mona Offshore Wind Project. Barrow Offshore Wind Farm have been consulted as part of the Marine Navigation Engagement Forum (MNEF) and attended the hazard workshop as set out in Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098).</p> <p>The Applicant has assessed the potential impacts of the Mona Offshore Wind Project on navigational risk for all marine users within the shipping and navigation study area presented in Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). It was concluded that all hazards, including collision with wind farm service vessels and allision with wind turbines operated by other developers, had been reduced to As Low As Reasonably Practicable (as per section 1.9.8 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098)).</p> <p>The Applicant has committed within Volume 2, Chapter 7: Shipping and navigation (APP-059) to continue engagement with all stakeholders through the Marine Navigation Engagement Forum (MNEF) which includes offshore wind energy developers.</p>
RR-004.6	Issue Three: We believe that MOWF will adversely affect the energy yield of our Development. Due to the proximity outlined in the above-referenced figure and table, there is the potential for MOWF to interfere with wind speed or direction at our Development causing reduction in energy output. This requires to be properly assessed and appropriately mitigated / compensated.	<p>Volume 2, Chapter 10: Other sea users of the Environmental Statement (APP-062) considers offshore energy receptors, including offshore wind farms. Barrow Offshore Wind Farm is considered as part of the baseline (section 10.5.2.9–14) in this chapter.</p> <p>APP-062 sets out that NPS EN-3 (paragraph 2.8.44) recognises that offshore wind development will occur in or close to areas where there is other offshore infrastructure. The project boundary requirements in The Crown Estate's Round 4 Information Memorandum specified that no offshore wind projects could be located within 7.5 km of an existing offshore wind farm. As described in APP-062 section 10.5.4, Figure 10.4 and Table 10.10, there are no other operational offshore wind farms located within 7.5 km of the Mona Array Area and therefore the Mona Offshore Wind Project location adheres to the TCE siting criteria.</p> <p>As referenced in Volume 2, Chapter 10: Other sea users (APP-062), a recent study commissioned by TCE indicated that, for the non-site-specific scenarios modelled, potential wake effects level off with approximately 10 km separation between offshore wind farms, and for separations much larger than 20 km wake effects become vanishingly small (Frazer-Nash Consultancy Limited, 2023).</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>The Mona Array Area has been reduced following the statutory pre-application consultation, as described in section 4.11.2 and Table 4.23 of Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (APP-051). This has increased the distance from the nearest existing operational wind farm by an additional 4.0 km, and also increased the distance from a number of other operational wind farms, thereby reducing the potential for wake effects. The distance between the Mona array area and Barrow Offshore Wind Farm is 43.3 km.</p> <p>On the basis of the distances between the Mona Array Area and other operational wind farms, including the Barrow Offshore Wind Farm, the potential for wake effects has been scoped out of further assessment of impact on other sea users.</p>

## 2.5 Blackpool Airport

Table 2.5: RR-005 – Blackpool Airport

Reference	Relevant Representation Comment	Applicant's response
RR-005.1	Protecting safe operation of aircraft in and around Blackpool Airport, and the impact of the works on the operation.	<p>Section 1.9.2 of Volume 4, Chapter 1: Aviation and radar (APP-075) identified a potential significant effect of the Mona Offshore Wind Project on Instrument Flight Procedures (IFP) at Blackpool Airport during the operations and maintenance phase of the Mona Offshore Wind Project. The mitigation identified to reduce the residual impact such that there is no longer a significant effect, is an increase to the Minimum Sector Altitude (MSA).</p> <p>The Applicant has engaged with the Airport throughout the pre-application phase (see Table 1.5 in APP-075) and discussed the results of the impact assessment. Agreement is being sought to raise the impacted MSA altitudes to a level that will provide the required minimum of 1,000 ft separation over the maximum wind turbine tip elevation. However, the Airport has made the Applicant aware that it is currently undertaking a five-year review of its IFPs with inclusion of Mona Offshore Wind Project and other proposed plans and projects. The Applicant has agreed with the Airport that it would complete a cumulative effects assessment of the Irish Sea windfarms on its IFP as requested by the Civil Aviation Authority (CAA). The Applicant understands this cumulative assessment will be completed in autumn 2024, prior to re-engaging on mitigation requirements for Mona Offshore Wind Project. The parties will provide an update in to the Examination following re-engagement.</p> <p>The Applicant notes that the Examining Authority has requested submission of an initial Statement of Common Ground between the parties at Deadline 1 (7<sup>th</sup> August 2024).</p>

## 2.6 Bodorgan Maine Limited

**Table 2.6: RR-006 – Bodorgan Marine Limited**

Reference	Relevant Representation Comment	Applicant's response
RR-006.1	<p>Mona NSIP Representations by Bodorgan Marine Limited PART 1: Co-Location Co-location strategy matters 1. The Applicant recognises the need for an effective co-location strategy and indeed claims that an overview of the co-location strategy will be set out in the Outline Fisheries Liaison and Co-Existence Plan ('FLCP'); see 1.1.5 and 1.3.2 of the FLCP.</p> <p>2. However, the FLCP does not present a co-location strategy. What the FCLP does is present a strategy for a form of co-existence – and not co-location - in allowing business as usual scallop fishing to continue in part of the development area.</p> <p>3. Business as usual fishing is not in our opinion co-location. Indeed, the applicant's own material recognizes this reality: see ES Volume 6, Annex 6.1 Commercial Fisheries Technical Report where business as usual fishing is described as co-existence.</p> <p>4. What the applicant should have done was to have turned its mind to the meaning of co-location, in particular as that term is understood in Welsh waters. If it had done so, it would have considered CEFAS's April 2020 document entitled: "Welsh National Marine Plan: A review of the potential for co-existence of different sectors in the Welsh Marine Plan Area" ('the 2020 CEFAS Report).</p> <p>5. It is not clear that the applicant has considered the 2020 CEFAS Report as it is not listed in the Environmental Statement Chapter on Policy and Legislative background, Volume 1, Chapter 2.</p> <p>6. If the applicant had considered the 2020 CEFAS Report: • its consultation activities, • its mitigation strategy, and • its socio-economic and other assessments would have focused on defining and delivering a strategy for realising the</p>	<p>The Applicant notes the response and understands that Bodorgan Marine Limited is a company within the mussel aquaculture industry who operates in the Menai Straights, outside the Mona Array Area and Offshore Export Cable Corridor.</p> <p>The Welsh National Marine Plan (WNMP) defines co-existence as "<i>where multiple developments, activities or uses can exist alongside or close to each other in the same place and/or at the same time</i>". The WNMP defines co-location as "<i>a subset of co-existence and is where multiple developments, activities or uses co-exist in the same place by sharing the same footprint or area</i>". The commitments secured within the Outline Fisheries Liaison and Co-existence Plan (APP-199) extend beyond "<i>allowing business as usual scallop fishing to continue in part of the development area</i>" (as stated by Bodorgan Marine Limited). As set out in section 1.3.6 of APP-199, in addition to identifying an area that will remain free of wind turbines and offshore substation platforms (OSPs) over an area of core scallop grounds within the Mona Array Area, termed the Scallop Mitigation Zone, the Applicant increased the spacing between infrastructure to a minimum of 1.4 km within and between rows of surface structures and made a commitment to orientating wind turbine rows roughly north – south. All of these measures are to facilitate continued access and fishing by trawlers and potters.</p> <p>The WNMP states that "<i>the Subsea Cable sector can reduce the potential for conflict, and increase co-location and co-existence opportunities, by undertaking burial of the cable</i>" and "<i>Preference should be given to this method of cable installation where there is possibility of significant impact by other activities and where seabed conditions are suitable. Where burial is not achievable or desirable, alternative protection measures may be appropriate (in line with regulatory requirements and industry good practice)</i>". To ensure safety of fishing activity and to minimise the amount of fishing grounds lost, the Applicant has made a commitment to bury all offshore cables to a target burial depth of 1 m, a maximum burial depth of 3 m and minimum depth of 0.5 m. Cable protection will only be used where the minimum target burial depth (0.5 m) cannot be achieved, for example in areas of hard ground, which will be informed by outputs from the Cable Burial Risk Assessment completed as part of the cable specification and installation plan (both of which are secured under Schedule 14, Condition 18(1)(d)(i) of the Draft DCO (APP-023). Cable protection (where required) shall be</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>potential of the most promising form of co-location with offshore wind energy. This is widely and authoritatively recognised to be the co-location of mussel aquaculture and offshore wind energy. The 2020 CEFAS document: the meaning of co-location in Welsh waters</p> <p>7. The 2020 CEFAS Report confirms that co-location is not the same thing as co-existence. Co-location is narrower and more specific. This is in contrast with the applicant's definition of co-location in the FLCP at 1.3.1.1.</p> <p>8. The 2020 CEFAS Report does not treat the interaction of offshore wind energy and fishing as co-location. Rather, its focus is on aquaculture as a co-location activity and it includes a specific chapter heading examining the co-location of aquaculture and offshore wind energy.</p> <p>9. Extracts from the 2020 CEFAS Report confirm the potential of aquaculture to be the most promising form of co-location.</p>	<p>designed to minimise snagging hazards as far as possible, for example by minimising height above seabed, smooth and shallower profiles, grade used for rock placement, type of rock (e.g. smoother edges) (as secured within APP-199).</p> <p>As stated above and as set out in section 1.3.6 of APP-199, the Applicant has made significant commitments in the design of the project to allow continued fishing activity within the Mona Array Area and Offshore Export Cable Corridor. These commitments made by the Applicant correspond with the WNMP's definition of co-location, i.e. <i>"multiple developments, activities or uses co-exist in the same place by sharing the same footprint or area"</i> (ECON_01: Sustainable economic growth, Paragraph: 98). These design commitments are not restrictive to gear types and other techniques can be used to target new species which may enhance the fishing industry.</p> <p>While the Applicant did not make specific reference to the 2020 Cefas Report, the 2020 Cefas report specifically quotes and defines the co-existence and co-location and references key guidance that are set out within the WNMP.</p> <p>While the Applicant notes the response, Volume 6, Annex 6.1 Commercial fisheries technical report (APP-097) does not describe or define co-existence as <i>"business as usual fishing"</i>. The Applicant did not specifically define co-existence or co-location in paragraph 1.3.1.1, but rather states in the Outline Fisheries Liaison and Co-existence Plan (APP-199) that <i>"The Applicant regards co-existence and co-location as the joint presence of both industries working together within the Mona Array Area and believes that co-existence and co-location between Mona Offshore Wind Project and commercial fisheries stakeholders can be achieved through the design of the project and ongoing transparent communications"</i>.</p> <p>While the Applicant did not specifically define co-location, APP-058 and APP-199 has been developed with reference to key guidance outlined within the WNMP. Policy SAF_01 specifically speaks to not impacting on established activities, and in paragraph 242 it states that <i>"promoting the co-existence of compatible activities and supporting the avoidance or mitigation of conflicts between users wherever possible"</i>.</p> <p>The Applicant did not identify and are not aware of any existing aquaculture industries that overlap with the Mona Array Area and Offshore Export Cable Corridor (as shown on Figure 1.6 of Volume 5, Annex 5.1: Cumulative effects screening matrix (APP-084)), which would benefit from co-location. Official landings data which included, Landing statistics by ICES Rectangle for United Kingdom (UK) and Isle of Man vessels (all vessel sizes), MMO Landings statistics</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>by port (all vessel sizes), Vessel Monitoring Systems (VMS) data for UK and Isle of Man vessels (<math>\geq 15</math> m). Welsh National Marine Plan - Estimated relative fishing activity within Welsh waters only (NRW) also did not produce any evidence of species associated with aquaculture activities being landed within the project commercial fisheries study area (see Figure 6.1 in Volume 2, Chapter 6: Commercial Fisheries (APP-058)).</p>



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## 2.7 Burbo Extension Ltd

Table 2.7: RR-007 – Burbo Extension Ltd

Reference	Relevant Representation Comment	Applicant's response
RR-007.1	Burbo Extension Ltd owns the Burbo Bank Extension Wind Farm, an operational offshore windfarm with a Development Consent Order (DCO) and relevant marine licences ("our Development"). Its proximity to Mona Offshore Wind Farm ("MOWF") can be seen in MOWF's Environmental Statement (the "ES") (F2.10 Figure 10.4, Table 10.10). Our Development does not object to the principle of MOWF. We do, however, wish to participate in the DCO Examination to make representations about the potential impacts on and interactions with our Development and, where appropriate, to secure appropriate mitigations.	The Applicant notes your response. Burbo Bank Extension Wind Farm is a minimum of 30.6 km from Mona Offshore Wind Project as stated in Table 10.10 of Volume 2, Chapter 10: Other sea users (APP-062).
RR-007.2	Concerns were previously highlighted to MOWF via a s48 consultation response and subsequent meeting. Our concerns as raised in the s48 response remain extant and we expect further meaningful engagement to seek to address the issues raised below and previously. We are open to addressing such matters within or outside the Examination process.	Burbo Bank Extension is considered as part of the baseline in Volume 2, Chapter 10: Other sea users (APP-062), and has been considered in the cumulative screening for each topic where appropriate. Engagement has occurred with Burbo Bank Extension Limited during the pre-application phase of the Mona Offshore Wind Project and will continue throughout the examination phase.
RR-007.3	Our Development expects to continue to operate and be maintained in the long-term. It may be upgraded and repowered in future, and will then be decommissioned. Co-existence with our Development must be considered and protected over the long-term – and the acceptability of cumulative and in-combination impacts – must be properly assessed taking into account each of the above stages of our Development's life. Our Development requires that its operations, consents (including conditions), and any stakeholder agreements entered into by it are unaffected by MOWF. Our Development's concerns include the following.	An impact assessment, including the potential impact on the possible reduction or restriction of other offshore energy activities as a result of the Mona Offshore Wind Project, is presented in Volume 2, Chapter 10: Other sea users (APP-062). The scope of potential impacts, as set out in Table 10.6 of Volume 2, Chapter 10: Other sea users (APP-062), has been developed in consultation with relevant statutory and non-statutory stakeholders throughout the pre-application phase, which included consideration of matters raised in the section 42 consultation response from Burbo Bank Extension Limited. Potential impacts have been appropriately assessed in accordance with the process set out in Volume 1, Chapter 5: Environmental Impact Assessment methodology (APP-052). No adverse impacts were assessed as significant in Environmental Impact Assessment (EIA) terms.  As set out in Table 10.16 of Volume 2, Chapter 10: Other sea users (APP-062) the Mona Offshore Wind Project has committed to continued consultation through the

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Reference	Relevant Representation Comment	Applicant's response
RR-007.4	<p>Issue one: The ES highlights potential significant impacts on wildlife features, including potential significant project-alone and in-combination impacts on marine mammals (F2.4). We are not convinced that the baseline and the predicted impacts are robust and align with our understanding of the local environment and we require to analyse this further. Future impacts of our Development, such as operation and maintenance, must be accounted for by MOWF and appropriate mechanisms must be put in place to facilitate co-existence and allow co-ordination to reduce potential cumulative or in-combination impacts.</p>	<p>life of the project, as required, with other offshore energy operators to minimise disruption to either party's operations and maximise coexistence.</p> <p>The Mona Offshore Wind Project has undertaken a robust assessment of potential impacts on marine wildlife informed by appropriate data sources from site specific surveys and detailed desktop studies, in accordance with relevant topic specific guidance. The assessment of potential impact to marine wildlife is presented four chapters: Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), Volume 2, Chapter 4: Marine mammals (APP-056) and Volume 2, Chapter 5: Offshore ornithology (APP-057).</p> <p>The evidence to inform the baseline and the approach to predicting effects on marine mammals were discussed and agreed through an Evidence Plan Process which included an Expert Working Group (EWG) for marine mammals as set out in section 4.5 of the Consultation Report (APP-037). To inform the Environmental Statement, site-specific surveys were undertaken, as agreed with the marine mammal EWG, across the Mona Array Area plus a buffer extending between 7 to 16.5 km. Further, and on advice from the marine mammal EWG, additional data sources and informative documents were identified post-scoping that were used to inform the baseline characterisation. All suggested data sources have been included in the baseline (Volume 6, Annex 4.1: Marine mammal technical report (APP-090)). The Applicant is therefore confident that the assessment of likely significant effects on marine mammals presented in Volume 2, Chapter 4: Marine mammals (APP-056) is based on the most scientifically robust evidence available and that sufficient precaution is built into the assessment. With respect to potential cumulative or in-combination effects, the assessment has considered all reasonably foreseeable (i.e. those with information in the public domain) projects, plans and activities.</p> <p>The Underwater sound management strategy (with Outline underwater sound management strategy included as part of the application, (APP-202)) will reduce the Mona Offshore Wind Project's contributions to the cumulative assessment, if required, post consent. Requirements for management measures and mitigation will be discussed in consultation with the licensing authority and statutory nature conservation bodies (SNCBs).</p> <p>As outlined in Volume 2, Chapter 10: Other sea users (APP-062) the Mona Offshore Wind Project has committed to consultation with other offshore energy operators to minimise disruption to either party's operations and maximise coexistence.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-007.5	<p>Issue two: The ES highlights extensive impacts on shipping and navigation and commits to stakeholder engagement (F2.7 7.14.1.2-7.14.1.4). We require to be involved in such engagement to ensure that our consents, agreements, and operations are not adversely affected by MOWF. The high concentration of allision risk created around our Development due to the “high density of traffic” and the “proximity of transit to existing offshore wind farms” is specifically referred to in the ES (F2.7 7.9.8.5), emphasising the need for further engagement to reduce risks.</p>	<p>The Applicant notes that Burbo Extension is located more than 16 nm to the southeast of the Mona Array Area. It should be noted that the reference in paragraph 7.9.8.5 within Volume 2, Chapter 7: Shipping and navigation (APP-059) refers to the existing baseline conditions with the Mona Offshore Wind Project accounting for no material change in the density of traffic or proximity of vessel transits to Burbo Extension.</p> <p>The Applicant has assessed the potential impacts of the Mona Offshore Wind Project on navigational risk for all marine users within the shipping and navigation study area within Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). It was concluded that all hazards, including collision with wind farm service vessels and allision with wind turbines operated by other developers, had been reduced to As Low As Reasonably Practicable (as per section 1.9.8 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098)).</p> <p>The Applicant has committed within Volume 2, Chapter 7: Shipping and navigation (APP-059) to continue engagement with all stakeholders through the Marine Navigation Engagement Forum (MNEF) which includes Ørsted and other offshore wind energy developers.</p>
RR-007.6	<p>Issue Three: We believe that MOWF will adversely affect the energy yield of our Development. Due to the proximity outlined in the above-referenced figure and table, there is the potential for MOWF to interfere with wind speed or direction at our Development causing reduction in energy output. This requires to be properly assessed and appropriately mitigated / compensated.</p>	<p>Volume 2, Chapter 10: Other sea users of the Environmental Statement (APP-062) considers offshore energy receptors, including offshore wind farms. Burbo Bank Extension Wind Farm wind farm is considered as part of the baseline (section 10.5.2.9–14) in this chapter.</p> <p>APP-062 sets out that NPS EN-3 (paragraph 2.8.44) recognises that offshore wind development will occur in or close to areas where there is other offshore infrastructure. The project boundary requirements in The Crown Estate's Round 4 Information Memorandum specified that no offshore wind projects could be located within 7.5 km of an existing offshore wind farm. As described in APP-062 section 10.5.4, Figure 10.4 and Table 10.10, there are no other operational offshore wind farms located within 7.5 km of the Mona Array Area and therefore the Mona Offshore Wind Project location adheres to the TCE siting criteria.</p> <p>As referenced in Volume 2, Chapter 10: Other sea users (APP-062), a recent study commissioned by TCE indicated that, for the non-site-specific scenarios modelled, potential wake effects level off with approximately 10 km separation between offshore wind farms, and for separations much larger than 20 km wake effects become vanishingly small (Frazer-Nash Consultancy Limited, 2023).</p> <p>The Mona Array Area has been reduced following the statutory pre-application consultation, as described in section 4.11.2 and Table 4.23 of Volume 1, Chapter</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>4: Site selection and consideration of alternatives of the Environmental Statement (APP-051). This has increased the distance from the nearest existing operational wind farm by an additional 4.0 km, and also increased the distance from a number of other operational wind farms, thereby reducing the potential for wake effects. The distance between the Mona array area and Burbo Bank Extension Wind Farm is 30.6 km.</p> <p>On the basis of the distances between the Mona Array Area and other operational wind farms, including the Burbo Bank Extension Wind Farm, the potential for wake effects has been scoped out of further assessment of impact on other sea users.</p>
RR-007.7	<p>Issue Four: Our Development has put in place appropriate mitigation in relation to potential impacts on the Warton Airfield Primary Surveillance Radar. We require assurance that MOWF will not adversely affect or increase the cost of such mitigation.</p>	<p>The Mona Offshore Wind Project has not had a technical objection in regard to the Primary Surveillance Radar (PSR) from the Ministry of Defence (MOD) Defence Infrastructure Organisation (DIO), who is responsible for Warton Aerodrome aeronautical/aviation safeguarding. No significant impacts to Warton Airfield PSR were identified in EIA terms in Volume 4, Chapter 1: Aviation and radar (APP-075). Thus, the Applicant has no reason to believe that the Mona Offshore Wind Project might adversely affect or increase the cost of the mitigation put in place by Burbo Extension Ltd related to Warton Aerodrome PSR.</p>

## 2.8 CLdN RoRo Ltd

Table 2.8: RR-008 – CLdN RoRo Ltd

Reference	Relevant Representation Comment	Applicant's response
RR-008.1	<p>Safety of navigation by the introduction of a narrow navigable corridor creating traffic conflicts. Potential increased response time to a marine casualty. The Crown Estate award process. Restricted weather routeing options for company vessels</p>	<p>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 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 modified the boundaries of the Mona array area boundary which has increased the searoom around the Project to reduce the risk and impacts on navigational safety (as set out in section 7.9 and 7.11 of Volume 2, Chapter 7: Shipping and navigation (APP-059) and in section 4.11.2 of Volume 1, Chapter 4: Site selection and consideration of alternatives (APP-051).</p> <p>The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also amended the boundaries of 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. As a result of these boundary amendments and commitments to control measures (e.g. development and adherence to an Aids to Navigation Management Plan, Design Plan, an Offshore Environmental Management Plan that includes a Fisheries Liaison and Co-existence Plan, an Offshore Construction Method Statement, which includes a Cable Specification and Installation Plan, a Vessel Traffic Management Plan, an Emergency Response and Cooperation Plan and use of notice to mariners, as set out in section 7.8 of Volume 2, Chapter 7: Shipping and navigation (APP-059) and which are all secured within the deemed marine licence in Schedule 14 of the draft DCO and expected to be secured within the standalone NRW marine licence), and noting that a residual risk over the baseline remains, the NRA Hazard Workshop concluded that all hazards, identified as unacceptable at PEIR, had been reduced to As Low As Reasonably Practicable (ALARP).</p> <p>Impacts on emergency responses (such as those to marine casualties) are assessed within section 7.9.6 of Volume 2, Chapter 7: Shipping and navigation (APP-059) and were deemed to be of minor adverse significance. As set out in Table 7.17 of APP-059, the Mona Offshore Wind Project has also committed to a wind turbine layout incorporating two-lines of orientation for search and rescue</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>purposes, which is secured through Schedule 14, Condition 18 of the Draft DCO (APP-023) which requires submission of a design plan to the licencing authority in consultation with MCA and Trinity House prior to commencement of construction.</p> <p>Impacts on adverse weather routeing were also assessed, within section 7.9.4 of APP-059, and were deemed to be minor adverse for CLdN RoRo Ltd for both the Mona Offshore Wind Project alone and cumulatively with other projects, plans and activities. The Applicant will continue engaging with stakeholders including CLdN RoRo Ltd throughout the examination phase of the Mona Offshore Wind Project.</p>

## 2.9 Conwy County Borough Council

**Table 2.9: RR-009 – Conwy County Borough Council**

Reference	Relevant Representation Comment	Applicant's response
RR-009.1	Conwy County Borough Council raised concerns in respect of the Section 42 consultation relating to the following matters: i) the need for that further refinement of the working corridor that was identified in the PEIR is very broad and to identify constraints and assess the impacts of the proposal	The working corridor of the Mona Offshore Wind Project has been refined since the Section 42 consultation. The process for how the Mona Offshore Wind Project has been refined (taking into account constraints identified in the Environmental Impact Assessment process and responses from consultation) is described in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). The refined project parameters, including those for the onshore cable corridor, as presented Volume 1, Chapter 5: Project Description (APP-050) have been used throughout the Environmental Statement to assess the potential impacts of the Mona Offshore Wind Project.
RR-009.2	ii) the submission of a Traffic Management Plan for Abnormal Indivisible Loads.	An Outline Construction Traffic Management Plan (CTMP) is provided in the DCO application (APP-225). The purpose of the Outline CTMP is to establish the principles and procedures that will be implemented through the final CTMP to minimise adverse impacts associated with the transport of materials, plant and staff associated with the construction of the Mona Offshore Wind Project. Section 1.5 of the Outline CTMP describes how Abnormal Indivisible Loads (AILs) will be managed throughout the construction of the Mona Offshore Wind Project. The Outline CTMP (APP-225) forms part of the Code of Construction Practice (CoCP) and is secured by Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03). The final version of the CTMP will be implemented as approved by the relevant local planning authority (Conwy County Borough Council for construction activities within its area).
RR-009.3	iii) the need for highway authority consent in respect of signage and for works to apparatus in the highway.	The Outline CTMP (APP-225) and the Outline highways access management plan (APP-228) provide information regarding the traffic management measures, including signs, and the carrying out of works to apparatus in the highway. These two outline plans form part of the Code of Construction Practice and are therefore secured under Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03). Final versions of these plans will be implemented as approved by the relevant local planning authority (Conwy County Borough Council for construction activities within its area).

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Reference	Relevant Representation Comment	Applicant's response
RR-009.4	iv) the need for consultation with the owners of the bridges over the A55 and railway	<p>The Applicant has consulted with relevant landowners throughout the consultation period as described in the Consultation Report (APP-037) including the Welsh Ministers and Network Rail Infrastructure Limited.</p> <p>Further details of proposed traffic control measures in relation to the bridges over the A55 and railway are set out in the Outline CTMP (APP-225) including the management of abnormal indivisible loads (Section 1.5).</p> <p>The Outline CTMP (APP-225) forms part of the Code of Construction Practice (CoCP) and is therefore secured by Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03). A final version of the CTMP will be implemented as approved by the relevant local planning authority (Conwy County Borough Council for construction activities within its area).</p>
RR-009.5	v) the need for further assessment of private water supplies.	<p>The Environment Officers at Conwy County Borough Council and Denbighshire County Council provided information on the private water licences they currently manage. Information on these licences is presented in Volume 7, Annex 1.1: Aquifers, groundwater abstractions and ground conditions (APP-115). A preliminary assessment of the potential impacts on private groundwater supplies as a result of the Mona Offshore Wind Project is included in Volume 7, Annex 1.2: Groundwater sources of supply – hydrogeological risk assessment (APP-116) and mitigation measures will be based on the hierarchy in Table 1.6. The mitigation measures will be set out in the detailed Code of Construction Practice (Mitigation and Monitoring Schedule (APP-196)).</p>
RR-009.6	x) Concerns that landfall works could affect the stability of the landfill site at Llanddulas Beach.	<p>The design of the landfall as assessed in the Preliminary Environmental Information Report (PEIR) included the option of open cut trenching for cable installation across the intertidal area. This option is no longer being taken forward and was therefore not assessed as part of the Environmental Statement. Instead, the Mona Offshore Wind Project has committed to use a trenchless technique for cable installation at the landfall to cross the intertidal area and Llanddulas Beach including the former Llanddulas Beach landfill. Further details are set out in the Outline Landfall Construction Method Statement (APP-226), which forms part of the CoCP. The CoCP is secured by Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03). A final version of the Landfall Construction Method Statement will be implemented as approved by the relevant local planning authority (Conwy County Borough Council for construction activities within its area).</p>



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Reference	Relevant Representation Comment	Applicant's response
RR-009.7	vi) the need for mitigation measures for noise, dust and vibration and for further noise monitoring.	Measures to mitigate the potential impacts of dust, noise and vibration as a result of the construction of the Mona Offshore Wind Project are set out the Outline Dust Management Plan (APP-214) and the Outline Construction Noise and Vibration Management Plan (APP-215), which form part of the CoCP. The mitigation measures will be monitored by the Applicant throughout the construction phase. The CoCP is secured by Requirement 9 of the draft DCO (AS-010 to be superseded by C1 Draft Development Consent Order F03). Final versions of the Dust Management Plan and the Construction Noise and Vibration Management Plan will be implemented as approved by the relevant local planning authority (Conwy County Borough Council for construction activities within its area).
RR-009.8	vii) works along the cable corridor should be confined to 0800 - 1800 hours Monday to Friday and 0800 - 1300 Saturday.	The proposed core construction hours for the onshore works are 07:00 to 19:00 Monday to Saturday (see Requirement 14 of the draft DCO (Requirement 9 of the draft DCO; C1 Draft Development Consent Order F03). These hours are considered to be appropriate as the potential impacts to sensitive receptors of undertaking works within these hours have been assessed and no significant effects have been identified (see Volume 3, Chapter 9: Noise and Vibration (APP-072)).
RR-009.9	viii) the need for a BS5387 survey for trees and woodlands and for tree/woodland management plans	<p>A survey of trees and woodland within the Mona Onshore Development Area was undertaken in 2023 and the results are reported in Volume 7, Annex 6.6: Tree Survey and Arboricultural Impact Assessment (APP-160 to APP-167). The survey was undertaken in accordance with the requirements set out in BSI Publication (2012) BS5837: Trees in relation to design, demolition and construction – recommendations.</p> <p>Due to access constraints, some areas within the Mona Onshore Development Area could not be surveyed. The areas not subject to survey are identified in Volume 7, Annex 6.6: Tree Survey and Arboricultural Impact Assessment (APP-160 to APP-167); the tree and woodland positions in these areas have been reviewed using aerial mapping only. Trees and woodlands not included in the 2023 surveys will be surveyed prior to construction in accordance with the Outline Arboriculture Method Statement (APP-230), which forms part of the Code of Construction Practice (CoCP). The CoCP is secured by Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03). A final version of the Arboriculture Method Statement will be implemented as approved by the relevant local planning authority (Conwy County Borough Council for construction activities within its area).</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-009.10	ix) Further assessment needed on impact on Kinmel Park Registered Historic Park and Garden.	Potential impacts on the setting of Kinmel Park Registered Historic Park and Garden are considered in Volume 7, Annex 5.6: Settings Assessment (Onshore Infrastructure) (APP-150). The designated asset was scoped into the settings assessment due to its proximity to the Onshore Cable Corridor and a temporary construction compound, and the potential for partial intervisibility with the Onshore Substation. The assessment concluded that there would be no change to the setting of Kinmel Park Registered Historic Park and Garden.
RR-009.11	xi) Concerns of impacts on Traeth Pensarn SSSI.	The boundary of the Traeth Pensarn SSSI is shown on Figure 1.4 of Volume 7, Annex 3.1: Onshore Ecology Desk Study Technical Report (APP-121). Effects on Traeth Pensarn SSSI have been avoided through refining the boundary of the Mona Onshore Development Area to avoid the coastal vegetated shingle feature of the SSSI (as reported in Outline Landfall Construction Method Statement (APP-226)). Some areas of the SSSI are still included in the Onshore Development Area to allow for access to the beach but the coastal vegetated shingle will not be impacted. This approach has been discussed with NRW via the Onshore Ecology Expert Working Groups. The potential impact on the Traeth Pensarn SSSI has been assessed in Volume 3, Chapter 3: Onshore ecology (APP-066). It is also considered in Volume 2, Chapter 1: Physical processes (APP-053) and Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) however as the designated features of the SSSI are above mean high water, it was not considered further in those chapters. The assessment within Volume 3, Chapter 3: Onshore ecology (APP-066) concluded that there would be no change to the Traeth Pensarn SSSI. Any potential indirect impacts would be mitigated by measures in the CoCP, which is secured in the DCO (APP-023). An Outline version of the CoCP is included in the DCO application (APP-212).
RR-009.12	xii) Need for assessment of potential impacts of heat radiation on human and animal health.	The assessment of the 'actual Electro Magnetic Fields (EMF)' risks of the onshore electrical infrastructure is scoped out of the human health assessment (Volume 4, Chapter 4: Human health assessment (APP-078) on the basis that Mona Offshore Wind Project would adopt the International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines (ICNIRP, 1998) and Government voluntary Code of Practice on EMF public exposure (Department for Energy Security & Net Zero, 2012) such that the levels of exposure caused by the infrastructure would not pose a risk to public health. The public perception of risk in relation to operational EMF is assessed in Volume 4, Chapter 4: Human health assessment (APP-078). The assessment concluded that the public perception of risk in relation to operational EMF is negligible adverse.

## 2.10 Corporation of Trinity House of Deptford Strond

Table 2.10: RR-010 – Corporation of Trinity House of Deptford Strond

Reference	Relevant Representation Comment	Applicant's response
RR-010.1	Dear Sir / Madam, We refer to the above application for development consent. Trinity House is the General Lighthouse Authority for England, Wales, the Channel Islands and Gibraltar with powers principally derived from the Merchant Shipping Act 1995 (as amended). The role of Trinity House as a General Lighthouse Authority under the Act includes the superintendence and management of all lighthouses, buoys and beacons within its area of jurisdiction. Trinity House wishes to be registered as an interested party due to the impact the developments may have on navigation within Trinity House's area of jurisdiction.	The Applicant notes your response.
RR-010.2	Trinity House is likely to have further comments to make on the application and the draft Order(s) throughout the application process.	<p>The Applicant has engaged with Trinity House throughout the pre-application period, primarily through the Marine Navigation Engagement Forum (MNEF). The MNEF was created early in the pre-application phase as a forum to discuss shipping and navigation matters with stakeholders and met six times between 2021 and 2024 (see section 1.4.2. in the Technical Engagement Plan (APP-041) for further information).</p> <p>Further, the Applicant has taken into consideration comments from Trinity House in its draft DCO (C1 Draft Development Consent Order F03).</p> <p>The Applicant will continue to engage with Trinity House through the Examination period.</p>

## 2.11 Cyfoeth Naturiol Cymru / Natural Resources Wales

Table 2.11: RR-011 – Cyfoeth Naturiol Cymru / Natural Resources Wales

Reference	Relevant Representation Comment	Applicant's response
RR-011.1	<p>1. INTRODUCTION</p> <p>1.1 NRW have identified key concerns relating to the following matters, which have been categorised as offshore and onshore, as set out in the Environmental Statement (ES):</p> <ul style="list-style-type: none"> <li>- OFFSHORE <ul style="list-style-type: none"> <li>• Marine Ornithology</li> <li>• Marine Mammals</li> <li>• Fish and shellfish ecology</li> </ul> </li> <li>- ONSHORE <ul style="list-style-type: none"> <li>• Designated landscapes</li> <li>• Terrestrial Ornithology</li> <li>• Air Quality</li> <li>• Water Framework Directive (terrestrial)</li> </ul> </li> </ul> <p>The above matters are those that we advise either require amendments to the project, and/or substantial additional information, and/or amendments to the draft Development Consent Order ('DCO'). The topic and/or paragraph headings for these matters are marked "KEY CONCERN" in the relevant sections below. We also provide comments below on matters that may need minor amendments and / or clarification.</p> <p>These are matters that we can provide further details on in our Written Representations and / or can be addressed in our on-going dialogue with the Applicant in the preparation of Statement of Common Grounds (SoCGs).</p> <p>1.2 NRW will continue to provide further advice to the Applicant on all the required matters, through correspondence and meetings, with the aim of reaching as many positions of agreement and common ground, as possible, on outstanding matters prior to the examination of the proposal. Our Relevant Representation is based solely on the information</p>	<p>The Applicant welcomes NRW's Representation, and is pleased to note that NRW consider the application to be comprehensive and of a good quality.</p> <p>The Applicant also welcomes NRW's comments that many previous concerns, as raised during the pre-application process, have been appropriately addressed. The Applicant would like to note the engagement from NRW through the pre-application stage of the project, through both statutory non-statutory engagement and responses to formal consultation. NRW have presented clear written or verbal advice, which has helped shape the project through the pre-application process.</p> <p>The Applicant notes NRW's position with regards SoCG and is continuing to engage with NRW on the development of the document(s).</p> <p>NRW's role, and the distinction between comments made on behalf or NRW advisory and NRW Regulations and Permitting Services, is noted. The jurisdictions of NRW and JNCC are also noted, the Applicant has consulted with JNCC as required.</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>provided within the application documents. Any changes in our position will be reflected in our full Written Representation and SoCG.</p> <p>1.3 NRW has reviewed the application and, notwithstanding our key concerns and other issues raised herein, consider the submission, on balance, to be comprehensive and of a good quality. NRW is pleased to note that many of our previous concerns, as raised during the pre-application process, have been appropriately addressed.</p> <p>1.4 Our comments are made without prejudice to any further comments NRW may wish to make in relation to this application and examination whether in relation to the ES, provisions of the draft DCO and its Requirements, the deemed Marine Licence (dML), standalone Marine Licence (ML), SoCGs or other evidence and documents provided by Bp-Enbw and their consultants ('the Applicant'), the Examining Authority (ExA) or other interested parties. The following paragraphs comprise our Relevant Representation as a Statutory Party under the Planning Act 2008 and Infrastructure Planning (Interested Parties) Regulations 2015 and as an 'interested party' under s102(1) of the Planning Act 2008.</p> <p>1.5 For the avoidance of doubt, Sections 2 and 3 of this document relate to NRW in its capacity as advisor and/or consultee (referred to as 'NRW (A)'). Comments made on behalf of NRW's regulatory function, which operates independently under distinct legislation, are made separately (referred to as 'NRW MLT'). NRW's comments in respect of its function as it is the licensing authority under the Marine and Coastal Access Act (MACAA) 2009 are provided at Section 4. For clarity, NRW has also received applications for a Marine Licence under the MACAA 2009. It should be noted that NRW may also have wider consenting functions in respect of the project, which are not addressed in these relevant representations, for example in the</p>	

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Reference	Relevant Representation Comment	Applicant's response
	<p>determination of separate environmental permits under the Environmental Permitting Regulations 2016. These determinations operate independently from the DCO application process. We provide a comment on NRW's general purpose in Section 5.</p> <p>It should be noted that both NRW (A) and the Joint Nature Conservation Committee (JNCC) provide advice on offshore development in Welsh inshore and Welsh offshore waters (Welsh Inshore Region extends from Mean High Water Springs, 1-12 nautical miles. Welsh Offshore Region extends from 12-200 nautical miles or median line) that are regulated under a number of different regulatory regimes. NRW and JNCC are separately consulted under the Conservation of Habitats and Species Regulations 2017 and Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, and accordingly respond independently. Typically, advice in the offshore region (from 12nmi-200nmi) is the responsibility of JNCC. However, where the impacts and effects of a project might arise both within and beyond 12nmi and affect protected sites in jurisdictional waters, both NRW (A) and JNCC may need to provide advice. Please note that the advice provided in this relevant representation is applicable to the potential impacts and effects to Welsh protected sites only. For sites outside of Wales, the relevant Statutory Nature Conservation Body (SNCB) should be consulted.</p>	
RR-011.2	<p><b>2. OFFSHORE</b>  <b>2.1 Marine Ornithology – KEY CONCERN</b>  <b>EIA Related Issues</b></p> <p>Whilst NRW (A) considers it likely that the Environmental Impact Assessment (EIA) scale impacts from the Mona project alone are predicted to be small and hence not “significant” for the purposes of EIA, there are several areas of uncertainty, inconsistency and possible errors in the assessments presented that should be checked and corrected, where appropriate, before we can confirm agreement on a number of the conclusions. These are noted in 2.1.1 – 2.1.3 below.</p>	<p>The Applicant welcomes NRW's comments. The Applicant has provided responses to each of the points raised by NRW below.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-011.3	<p>2.1.1 Lack of confidence in assessments due to inconsistencies and potential errors in information</p> <p>At present there appear to be many inconsistencies and possible errors in the information provided throughout the offshore ornithology assessment documents. For example: Discrepancies between seasonal definitions presented across the documents.</p>	<p>The Applicant considered the biologically defined minimum population scales (BDMPS) bio-season from Furness (2015) where relevant and provided a rationale for any variation from the BDMPS bio-season in the technical reports. Table 5.13 in Volume 2, Chapter 5: Offshore ornithology (APP-057), table 1.3 in Volume 6, Annex 5.1: Offshore Ornithology baseline characterisation technical report (APP-091) and table 1.3 in Volume 6, Annex 5.2: Offshore ornithology displacement technical report (APP-092) present the bio-seasons defined in Furness (2015). These bio-seasons have been refined by the Applicant and presented in table 5.14 in Volume 2, Chapter 5: Offshore ornithology (APP-057), table 1.4 in Volume 6, Annex 5.1: Offshore Ornithology baseline characterisation technical report (APP-091) and in table 1.3 of Volume 6, Annex 5.2: Offshore ornithology displacement technical report (APP-092)</p> <p>The Applicant has noted a discrepancy regarding the non-breeding season for Atlantic puffin in table 5.14 in Volume 2, Chapter 5: Offshore ornithology (APP-057). The Atlantic puffin non-breeding season should be September to March (instead of mid-August to March, as stated in the document). This will be included in the Errata document submitted at Deadline 1.</p> <p>This discrepancy does not impact the assessment presented in Volume 2, Chapter 5: Offshore ornithology (APP-057) for Atlantic puffin, which is based on the correct seasonal abundance figure presented in table 1.48 in Volume 6, Annex 5.2: Offshore ornithology displacement technical report (APP-092). The correct values are also included in Volume 6, Annex 5.1: Offshore Ornithology Baseline Characterisation Technical Report (APP-091).</p> <p>The Applicant has also noted a discrepancy in the post-breeding/autumn migration for Manx shearwater in table 5.14 in Volume 2, Chapter 5: Offshore ornithology (APP-057). Manx shearwater post-breeding/autumn migration should be September to October (instead of September to early October as quoted in table 5.14 in Volume 2, Chapter 5: Offshore ornithology (APP-057)). This will be included in the Errata document submitted at Deadline 1.</p> <p>This discrepancy does not impact the assessment presented in Volume 2, Chapter 5: Offshore ornithology (APP-057) for Manx shearwater, which is based on the correct post breeding season/autumn migration abundance (182 individuals) presented in table 1.48 in Volume 6, Annex 5.2: Offshore ornithology displacement technical report (APP-092). The correct values are also presented in Volume 6, Annex 5.1: Offshore Ornithology Baseline Characterisation Technical Report (APP-091).</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>It is acknowledged that the months considered in each bio-season for presenting mortality estimates of displacement and collision differ for certain species (namely black-legged kittiwake and northern gannet). For the displacement assessment (presented in Volume 6, Annex 5.2: Offshore ornithology displacement technical report (APP-092)), mortality estimates in the displacement matrices are generated for each bio-season (rather than produced for each month). For displacement, the mean seasonal peak abundance is inputted into the displacement matrix to calculate the seasonal mortality estimate. When a species' bio-season spans half a month (e.g., breeding gannet - mid-March to mid-September), it is not possible to split the abundance data, and the whole month was used to calculate the seasonal displacement mortality (e.g., March and September).</p> <p>For collision risk, mortality estimates are calculated for each month in the collision risk modelling. Monthly estimates are subsequently added together and therefore, it is possible to half a monthly collision mortality estimate to calculate the seasonal collision mortality estimate. Monthly estimates of collision mortality are appropriate to account for changing parameters such as operational down time of the wind turbines.</p> <p>For the displacement (table 1.3 of Volume 6, Annex 5.2: Offshore ornithology displacement technical report (APP-092)), the following months have been used in each bio-season:</p> <p>Northern gannet bio-seasons:</p> <ul style="list-style-type: none"> <li>• Pre-breeding: December to February.</li> <li>• Breeding: March to September.</li> <li>• Post breeding: October to November.</li> </ul> <p>Black-legged kittiwake bio-seasons:</p> <ul style="list-style-type: none"> <li>• Pre-breeding: January to March.</li> <li>• Breeding: April to August.</li> <li>• Post-breeding: September to December.</li> </ul> <p>For collision, the following months were summed to provide the bio-seasonal impact:</p> <p>Northern gannet bio-seasons:</p> <ul style="list-style-type: none"> <li>• Pre-breeding: December, January, February and half of March.</li> <li>• Breeding: half of March, April, May, June, July, August and half of September.</li> </ul>



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Reference	Relevant Representation Comment	Applicant's response
		<ul style="list-style-type: none"> <li>• Post breeding: half September, October and November.</li> </ul> <p>Black-legged kittiwake bio-seasons:</p> <ul style="list-style-type: none"> <li>• Pre-breeding: January, February and March and half of April.</li> <li>• Breeding: half of April, May, June, July and half of August.</li> <li>• Post-breeding: half of August to December.</li> </ul>
RR-011.4	<p>Errors in seasonal collision totals presented in Section 5.7.5 of the Offshore Ornithology Chapter [APP-057] compared to the monthly collision estimates in the Collision Risk Modelling (CRM) Annex [APP-093] making up the seasonal definitions that are summed.</p>	<p>The Applicant's approach of adding half of the months impact to each bio-season when a bio-season starts/finishes mid-month was not explicitly stated within the application, leading to the interpretation of a discrepancy in bio-seasons between Volume 2, Chapter 5: Offshore ornithology (APP-057 and Volume 6, Annex 5.3: Offshore ornithology collision risk modelling technical report (APP-093). Annual collision estimates have been checked and are correct and consistent between Volume 2, Chapter 5: Offshore ornithology (APP-057) and Volume 6, Annex 5.3: Offshore ornithology collision risk modelling technical report (APP-093). The Applicant invites specific examples from NRW of where there are considered to be discrepancies in the seasonal collision risk totals.</p> <p>The months that have been included in each bio-season to report estimated collisions per bio-season are listed in full in the Applicant's response in ID row RR-011.3 above and presented in Volume 2, Chapter 5: Offshore ornithology (APP-057).</p>
RR-011.5	<p>Errors/discrepancies in the seasonal mean peak estimates presented for puffin (non-breeding season) and Manx shearwater (spring and autumn migration seasons).</p>	<p>The Applicant acknowledges the discrepancy for Atlantic puffin during the non-breeding season. The seasonal mean peak should be 22 birds and not 0, as reported in Volume 2, Chapter 5: Offshore ornithology (APP-057). This will be included in the Errata document submitted at Deadline 1.</p> <p>When considering the non-breeding period, the seasonal mean peak of 22 birds would result in no change in the expected mortality of 0 individuals (50% displacement and 1% mortality). The lower impact (30% displacement and 1% mortality) would also see no change (0 individuals), but the upper impact (70% displacement and 10% mortality) would change from 0 individuals to 2 individuals. The magnitude is still considered to be negligible as the baseline mortality rate will not exceed a 1% increase in baseline mortality. Therefore, this does not alter the conclusion of Volume 2, Chapter 5: Offshore ornithology (APP-057), provided in paragraph 5.7.2.55.</p> <p>The Applicant acknowledges the small discrepancy in some of the assessment tables of Volume 2, Chapter 5: Offshore ornithology (APP-057) for Manx shearwater. The year 2 spring migration peak has been presented (six birds) in</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>table 5.28 and table 5.35 instead of the correct figure of three birds. The peak value used is greater than the mean. Therefore, the magnitude will be equal to (or lower than) that reported in Volume 2, Chapter 5: Offshore ornithology (APP-057), which is negligible (paragraph 5.7.2.64). Thus, there would be no change to the conclusion of Volume 2, Chapter 5: Offshore ornithology (APP-057). The Applicant has reviewed Volume 2, Chapter 5: Offshore ornithology (APP-057) and is not aware of a discrepancy with the presentation of the autumn migration season mean peak of Manx shearwater, with 182 birds presented throughout Volume 2, Chapter 5: Offshore ornithology (APP-057). The Applicant welcomes further details from NRW with respect to this.</p>
RR-011.6	<p>We suggest that all tables of seasonal definitions, seasonal mean peak abundances for displacement, seasonal collision totals etc., presented throughout the various offshore ornithology documents are checked, as any errors will have fed through to the apportioned impacts to the designated sites.</p>	<p>The Applicant can confirm that amending the two discrepancies identified by NRW with respect to Atlantic puffin and Manx shearwater within Volume 2, Chapter 5: Offshore ornithology (APP-057) would not change the conclusions of the assessment. The Applicant can also confirm that these changes would not require any additional sites to be included within the HRA.</p> <p>Following detailed checks, the Applicant has also identified an inconsistency for razorbill between table 5.31 of Volume 2, Chapter 5: Offshore ornithology (APP-057) and table 1.4 of Volume 6, Annex 5.2: Offshore ornithology displacement technical report (APP-092). Breeding migration abundance does not match; 83 individuals are reported in table 1.4 of Volume 6, Annex 5.2: Offshore ornithology displacement technical report (APP-092), whereas 92 individuals are reported in table 5.31 of Volume 2, Chapter 5: Offshore ornithology (APP-057). The correct figure is 83 individuals. This will be included in the Errata document submitted at Deadline 1</p> <p>An inconsistency in the autumn migration abundance for razorbill has also been identified: 91 individuals are reported in table 1.4 of Volume 6, Annex 5.2: Offshore ornithology displacement technical report (APP-092), whilst 86 individuals in table 5.31 of Volume 2, Chapter 5: Offshore ornithology (APP-057). The correct figure is 91 individuals, as presented in table 1.4 of Volume 6, Annex 5.2: Offshore ornithology displacement technical report (APP-092). This will be included in the Errata document submitted at Deadline 1</p> <p>The Applicant has reviewed the assessment presented within Volume 2, Chapter 5: Offshore ornithology (APP-057), and this does not impact the conclusion of the assessment (provided in paragraph 5.7.2.112 of Volume 2, Chapter 5: Offshore ornithology (APP-057)) as the difference is five birds in the annual total.</p>
RR-011.7	2.1.2 Impacts to Sites of Special Scientific Interest (SSSIs)	<p>Within Volume 6, Annex 5.5: Offshore apportioning technical report (APP-095), the breeding season apportioning on common guillemot, razorbill, and black-legged</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>Reference is made to an assessment of operational displacement from the project alone to the guillemot feature of the Pen y Gogarth / Great Orme's Head SSSI in the Offshore Ornithology Chapter [APP-057]. However, we consider the assessment is unclear, and appears to be based on breeding season impacts only. Impacts to SSSI colony features should be apportioned to the colony in the non-breeding season as well, and the annual impact assessed against baseline mortality of the colony (calculated using the colony size in adults and the adult mortality rate). As the Mona project is located within foraging range of the guillemot, razorbill and kittiwake features of the Pen-y-Gogarth / Great Orme's Head Site SSSI, we again advise that detailed quantitative assessments of the potential impacts of the Mona project on all three of these features should be undertaken. The Applicant could consider following the approach taken by the applicant in the Awel-y-Môr DCO (see Deadline 3a assessment REP3a-019).</p>	<p>kittiwake is presented in table 1.8, table 1.11, and table 1.17, respectively. The increase in baseline mortality for razorbill and black-legged kittiwake did not indicate that Population Viability Analysis (PVA) was required, but the Applicant acknowledges that this calculation was not presented explicitly.</p> <p>The non-breeding season was not considered in Volume 2, Chapter 5: Offshore ornithology (APP-057) due to the size of the populations at the Pen-y-Gogarth / Great Orme's Head Site SSSI versus the BDMPS. With an adult breeding population of 3,578 birds at Pen-y-Gogarth/Great Orme's Head Site SSSI and a proportion of adults in UK western waters in the non-breeding season of 0.9 (taken from Skomer and Skokholm SPA (Furness, 2015)), the proportion of SSSI birds in the BDMPS (Adult UK Western waters of 656,156) is below 1%.</p> <p>For clarity, the Applicant recognises the value of presenting a specific document on the impact on the Pen-y-Gogarth/Great Orme's Head Site SSSI year-round and this will be provided for examination at Deadline 1.</p>
RR-011.8	<p>2.1.3 Cumulative Assessments (Volume 2, Chapter 5, APP-057)</p> <p>2.1.3.1. Data gaps</p> <p>The cumulative impact assessments contain numerous data gaps and cannot be considered comprehensive. This issue was raised as a concern by NRW (and also NE and JNCC) in the Preliminary Environmental Information Report (PEIR) responses and discussed during the Expert Working Groups (EWGs). We highlight that NRW (A) advised the Crown Estate Round 4 plan-level Habitats Regulations Assessment (HRA) to undertake quantitative 'gap-filling' for historic projects. It is unfortunate that this advice was not adopted as we do consider this problem would be best tackled at the strategic level. Nonetheless, the SNCBs supplied bespoke advice to the Applicant (and other Round 4 projects in the Irish Sea) detailing a hierarchical method to 'gap-fill' the Irish Sea cumulative and in-combination assessments. The advice to the applicant was to generate <b>indicative</b> estimates</p>	<p>Whilst it is the Applicant's view (in agreement with NRW) that data gaps associated with historic offshore wind projects are an aspect of cumulative impact assessments that would be better addressed at the strategic level rather than the project level, updates were made to the cumulative impact assessment in response to NRW's (as well as Natural England's and JNCC's) Section 42 advice with respect to historic offshore wind projects impacts for application. These updates also captured additional advice provided by Natural England on 23 October 2023. The cumulative and in-combination assessments presented in Volume 2, Chapter 5: Offshore ornithology (APP-057) and HRA Stage 2 ISAA for SPAs and Ramsar sites (APP-033), respectively, consider the quantitative impact of historic OWF projects where it has been possible to derive estimates from project-specific documentation. In the absence of quantitative assessment for historical projects, qualitative assessment has been presented where the information was available. The Applicant notes that internal discussions within NRW regarding developing an approach that may further help address data gaps associated with historic offshore wind projects are ongoing. The Applicant welcomes further information from NRW with respect to this and remains open to discussing further refinements to the cumulative / in-combination assessments where possible. Notwithstanding this, the Applicant remains confident that the approach and cumulative / in-combination assessments presented in Volume 2,</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>for currently unknown impacts, which have been assumed to be zero. Adopting an approach that would allow indicative estimates to be made (rather than assuming zero) would then enable more informed expert judgement to be made on the likelihood of adverse effects, and thus if further investigation by a more rigorous assessment was warranted.</p> <p>However, the Applicant has not followed the suggested SNCB advice and has instead presented a qualitative summary for the projects with no data, and essentially the impacts from these projects remain assumed as zero. We do not consider that the qualitative assessments presented by the Applicant are sufficient to give confidence in the conclusions drawn with respect to the level of significance of accumulating scale of impacts to some species. Our advice therefore remains as detailed in the original SNCB advice provided to the Applicant.</p> <p>However, there are ongoing internal discussions surrounding the development of an approach that may help to address this issue, which will be shared with the Applicant for consideration in due course.</p>	<p>Chapter 5: Offshore ornithology (APP-057) and HRA Stage 2 ISAA for SPAs and Ramsar sites (APP-033) are robust, precautionary and provide sufficient detail to conclude no significant effects and no AEOI beyond reasonable scientific, respectively.</p>
RR-011.9	<p>2.1.3.2. Data included for other projects in cumulative assessments.</p> <p>There are several errors in the figures included in the cumulative assessments for other projects, notably for Erebus for displacement, for example for puffin and gannet. We advise the Applicant to update the figures to include those advised by NRW (A) in our PEIR comments. Whilst we welcome that collision mortality from underwater devices (e.g., West Anglesey Demonstration zone) have been included, it would appear that the collision mortalities for these projects, for species such as auks, have been added to the cumulative displacement abundances that are then put through displacement matrices to calculate displacement mortality. The collision mortality figures should not be included within the abundance totals but should be added to</p>	<p>The Applicant acknowledges that the correct abundance estimate for Atlantic puffin within Project Erebus should be 1,416 individuals during the breeding season (not 15 individuals as presented in table 5.61 and table 5.93 Volume 2, Chapter 5: Offshore ornithology (APP-057)) and 160 individuals during the non-breeding season (not 0 individuals as presented in table 5.61 and table 5.93 in Volume 2, Chapter 5: Offshore ornithology (APP-057)) for Erebus according to table 5.3 of the Project Erebus: Supplementary Environmental Information Addendum Report (Blue Gem Wind, 2022). Furthermore, the Applicant acknowledges a discrepancy for northern gannet during the non-breeding season. The correct figure for northern gannet is 100 individuals (not 0 as presented in table 5.65 and table 5.98 of Volume 2, Chapter 5: Offshore ornithology (APP-057)) during the pre-breeding season as stated in table 23 Erebus: Offshore Ornithology 11.4 Technical Appendix – Displacement Analysis (HiDef, 2021). Peak abundances of other species have been checked for the Project Erebus and represent the updated figures presented in the Project Erebus: Supplementary</p>

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	<p>the displacement mortality figures that result from the displacement matrix approach.</p>	<p>Environmental Information Addendum Report (Blue Gem Wind, 2022). This will be included in the Errata document submitted at Deadline 1.</p> <p>The Applicant would like to confirm that the cumulative displacement abundances do not include the collision mortalities. Those have been added to the displacement mortality figures.</p> <p>As an example, in table 5.86 of Volume 2, Chapter 5: Offshore ornithology (APP-057), the total annual abundance (minus the Mona Offshore Wind Project) of 15,059 individuals and the cumulative total (all projects) of 17,578 individuals do not include the collision impacts. The collision impacts are considered when the increase in baseline mortality is presented for example, in paragraph 5.9.2.69 of Volume 2, Chapter 5: Offshore ornithology (APP-057), the additional 11.7 collision mortalities are specifically mentioned.</p>
<p>RR-011.10</p>	<p>The cumulative collision assessment text and tables in the Offshore Ornithology Chapter [APP-057] suggests the predicted collision figures for the other projects included have been corrected for the current advised avoidance rates. Clarity is required from the Applicant whether this is the case. If the predicated collision figures for the other included projects have been corrected for the current avoidance rates, then the details of the approach adopted should also be provided. Clarification is also required as to which Band Option (Option 2 or 3) the figures included for Awel-y-Môr for large gulls are from.</p> <p>Therefore, we recommend that the cumulative assessments are updated to address these issues where required before we can make any conclusions on the level of impacts.</p>	<p>The predicted collision figures in the cumulative collision assessment (see section 5.9.3 of Volume 2, Chapter 5: Offshore ornithology (APP-057) for the other projects included have been corrected for the current advised avoidance rates.</p> <p>For the assessment, it is crucial to base results on the most recent available evidence, such as the study by Ozsanlav-Harris <i>et al.</i>, (2023), rather than older offshore wind farm applications that used outdated avoidance rates. This approach ensures a "common currency" between Environmental Impact Assessments (EIAs), making conclusions robust and reflective of the true likely effect. This method has been applied in previous offshore wind farm applications (e.g. Awel y Môr) and is considered robust.</p> <p>Older wind farm applications used various avoidance rates as low as 0.980, whereas updated evidence now indicates rates up to 0.9991 for some species (Ozsanlav-Harris <i>et al.</i>, 2023). Some applications have used rates of 0.989, which still differ significantly from the updated rates used in more recent cumulative effect assessments. Consequently, combining results based on different avoidance rates is not considered a robust approach.</p> <p>The calculation to standardise impacts by using a consistent avoidance rate is straightforward due to how the Band collision model. The avoidance rate is applied at the end of the CRM calculation, allowing for an easy backward calculation to occur to make the avoidance rate consistent between projects. Collision risk models used by other developments have employed the same modelling parameters as those used for the Mona Offshore Wind Project (e.g., flight speeds, flight height)</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>The calculation used for collision impacts from each offshore wind farm was calculated as follows:</p> $(Total\ impact\ using\ original\ avoidance\ rate / (1 - (Original\ avoidance\ rate / 100))) * (1 - (new\ updated\ avoidance\ rate / 100))$ <p>For example, the original collision impact of 51.5 gannet from Walney Extension was derived using an avoidance rate of 98.9. Using the avoidance rate of 99.28, the collision impact is 33.71, calculated as follows:</p> $(51.5 / (1 - (98.9 / 100))) * (1 - (99.28 / 100)) = 33.7091$ <p>The Applicant can confirm that within the Mona Offshore Wind Project CEA the results presented for Awel y Môr were taken from the consented application, Volume 2, Chapter 4: Offshore Ornithology (RWE Renewables UK, 2022a), which were Option 3 rates.</p>
RR-011.11	<p>Additionally, the numbers included for the Morgan and Morecambe generation asset projects are based on data from the PEIRs for these projects, which were based on only 12 months of data and are therefore, subject to change and have a degree of uncertainty associated with them.</p>	<p>The Applicant has used the most recent available data and included that within Volume 2, Chapter 5: Offshore ornithology (APP-057). Morgan and Morecambe's most recent available data is limited to the first 12 months of their survey campaigns, as this was included in their Preliminary Environmental Impact Assessment (PEIR) which was the latest publicly available information at the point of Application. The Applicant notes that since the Mona DCO application was accepted, the Morgan Generation Assets application for a DCO application has been accepted for examination by the Planning Inspectorate and the application is based on 24 months of site-specific digital aerial survey data.</p>
RR-011.12	<p><b>2.1.4 HRA Related Issues</b>                  2.1.4.1. We reiterate the advice provided during the EWG discussions on the approach to the HRA Screening of likely significant effects (LSE), that where there is potential connectivity to a very large number of sites but the likelihood of significant impacts is generally low, the approach taken in this assessment may be considered appropriate regarding the project 'alone' assessment for Mona. It should be acknowledged however, that this approach will not necessarily be appropriate for all offshore windfarm cases. Impacts from other offshore windfarm projects are unlikely to be low. Additionally, if a designated site that has potential connectivity with an offshore windfarm project is in unfavourable condition and/or has a restore Conservation</p>	<p>The Applicant welcomes NRW's agreement that the approach to the HRA screening of LSE was appropriate for the Mona Offshore Wind Project.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-011.13	<p>Objective (CO) target (and a population which may be in decline), then even a small impact may adversely impact the COs and integrity of the European site(s) in question.</p> <p>Notwithstanding the above, we note that the Applicant's approach and presentation of apportionment of predicted impacts is, in places, difficult to follow and unclear.</p> <p>Whilst we consider that the likely significant effects from the project alone will not result in Adverse Effect on Site Integrity (AEoSI), the assessment and process of reaching the predicted impacts in the HRA Stage 1 Screening Report [APP-034] and HRA Stage 2 Information to Support an Appropriate Assessment (ISAA) Special Protection Areas (SPAs) and Ramsars [APP-033] is currently difficult to follow and unclear in places. Therefore, we require clarification (potentially to include a full worked example for a species and site of all apportioning (age classes and apportionment of impacts)) and/or updates to the assessment are required considering the advice below. This should provide clarity and confidence in the predicted levels of impact.</p>	<p>The Applicant acknowledges that a fully worked example for a species and site of all apportioning (age classes and apportionment of impacts) will add clarity and confidence in the predicted levels of impact.</p> <p>A worked example for great black-backed gull from the Isles of Scilly SPA is presented below, with references to where this information is provided within the application documents.</p> <p>The Isles of Scilly SPA is designated for great black-backed gull and is located within the "UK South-west and Channel" BDMPS as presented in Furness (2015). Mona Offshore Wind Farm Project is also located within the UK South-west and Channel BDMPS. Great black-backed gull from the Isle of Scilly SPA comprise 28.85% of the adult birds within the BDMPS during the non-breeding period (1,622 birds out of 5,622; Furness, 2015).</p> <p>The age classes used for apportioning are presented in table 1.6 of the Offshore Ornithology Apportioning Technical Report (APP-095). The impacts present in the HRA are for adult birds only. For great black-backed gull 44% of birds are estimated to be adults in the non-breeding season (Furness, 2015).</p> <p>The number of great black-backed gull collisions during the non-breeding season is presented in table 5.39 of the Offshore Ornithology Chapter of the Environmental Statement (APP-057). This is 3.18 individuals (all age classes) when using a 99.39% avoidance rate (species group avoidance rate; Ozsanlav-Harris <i>et al.</i>, 2023) or 0.48 when using a 99.91% avoidance rate (species specific avoidance rate; Ozsanlav-Harris <i>et al.</i>, 2023). A monthly breakdown of collisions is presented in table 1.7 of the Offshore ornithology collision risk modelling technical report (APP-094). Table A12 of the HRA Stage 1 Screening Report (APP-034), which presents the apportioned impact, presents that between 0.1 (99.91% avoidance) and 0.4 (99.39% avoidance) great black-backed gull collisions can be apportioned to the Isles of Scilly SPA.</p> <p>The total impact on great black-backed gull was calculated as follows.</p> <p><i>Collisions during the non-breeding season x proportion of adult birds x proportion from the Isle of Scilly SPA</i></p> <p><math>3.18 \times 0.44 \times 0.2885 = 0.40</math> <b>or</b></p> <p><math>0.48 \times 0.44 \times 0.2885 = 0.06</math></p>

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Reference	Relevant Representation Comment	Applicant's response
RR-011.14	<p>Qualifying features of Skomer, Skokholm, and Seas off Pembrokeshire (SSSP) SPA are Manx shearwater, European storm petrel, lesser black-backed gull, Atlantic puffin and a seabird assemblage. Guillemot, razorbill and kittiwake are not features in their own right but are named components of the seabird assemblage feature. The HRA Stage 1 Screening Report [APP-034] should be updated to reflect this.</p>	<p>This is also presented within point C) below paragraph 1.4.6.72 of the HRA Stage 1 Screening Report (APP-034). As the impact is <math>\geq 0.05</math> birds then the great black-backed gull qualifying feature of the Isles of Scilly SPA is screened into the HRA Stage 2 assessment (APP-033).</p> <p>The Applicant acknowledges that Table 5.10 of Volume 2, Chapter 5: Offshore ornithology (APP-057) incorrectly assigns Atlantic puffin to a named component of the seabird assemblage when it is a named qualifying feature in its own right. This does not impact the assessment of the species within the ES and the species is fully assessed where appropriate. Within Table 1.10 of the HRA Stage 1 Screening Report (APP-034), Atlantic puffin is incorrectly included as a named component of the seabird assemblage feature. However, it is a full qualifying feature. This discrepancy does not impact the assessment of Atlantic puffin throughout the HRA. This will be included in the Errata document submitted at Deadline 1.</p> <p>Table 1.9 of the HRA Stage 1 Screening Report (APP-034) incorrectly excludes European storm petrel as a breeding species within its foraging range. However, the species is included in Table 1.11 of the HRA Stage 1 Screening Report (APP-034) and is therefore included within the assessment.</p> <p>Table 1.10 of the HRA Stage 2 Screening Report (APP-034) was reproduced from Furness (2015). Within Furness (2015), the SPA colonies presented did not differentiate between a species named as a qualifying feature or a named component of the seabird assemblage. Both qualifying features and named components of the seabird assemblage were given the same treatment within Furness (2015).</p> <p>Within Table 1.53 and Table 1.68 of the HRA Stage 2 Screening Report (APP-034), the previous discrepancies also occur with some species not correctly identified as a named qualifying feature or part of the named assemblage. However, all of the species are accounted for and included in the assessment of impacts where appropriate.</p> <p>The Applicant's assignment of individual species to either a named qualifying feature or a component of the seabird assemblage does not affect the validity of the assessments presented, which appropriately consider all relevant species. This will be included in the Errata document submitted at Deadline 1</p>
RR-011.15	<p>2.1.4.2 Age class apportionment and sabbaticals (Volume 6, Annex 5.5, [APP-095])</p> <p>We do not consider the use of the kittiwake adult proportion that was calculated for Hornsea 2 to be appropriate to apply</p>	<p>The Applicant has provided the scientific rationale for this approach in paragraph 1.3.3.4 in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report (APP-095).</p>



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Reference	Relevant Representation Comment	Applicant's response										
	<p>to Mona due to the very low number of aged juvenile birds in the site-specific surveys, and that the juvenile survival rates (0-1 year) given in Horswill &amp; Robinson (2015) are very old and from a single colony in the North Sea (taken from Coulson &amp; White 1959) and hence have a poor data quality score (score of 1). Hence there is uncertainty around the appropriateness of the approach. Therefore, we advise a more appropriate approach for the breeding season would be to use the 95.23% of adults recorded in the Mona site-specific DAS data, or to take the same approach as for auks and Manx shearwater and assume all birds are adults.</p>	<p>The Applicant states in paragraph 1.3.3.4, "<i>Coulson (2011) presents evidence that immature kittiwakes, particularly those in their second and third years, frequent natal waters, with older immatures increasingly populating breeding colonies. Using site-specific survey data to calculate age class proportions for the breeding season will lead to an underestimation of second- and third-year immatures. Utilising the current approach (i.e., using proportions of adult and immature birds from Digital Aerial Surveys (DAS) to age-class birds) will therefore lead to an overestimation of adults, as only one-year-old birds are distinguishable during surveys, with all other age groups categorised as adults</i>".</p> <p>If 95.23% of birds in the breeding season (as suggested by NRW) had been used instead of 87.68%, the Applicant can confirm that there would be no material change to the assessment within the HRA Stage 1 Screening Report (APP-034) nor HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (APP-033). Had 95.23% been used, one additional site would have been screened into Stage 2 of the HRA. Wicklow Head SPA would change from 0.0 birds to 0.1 birds when considering the species group avoidance rate (99.3%). This one SPA would have been presented within Step 1 (section 1.5 of APP-033). For completeness, an example table for Wicklow Head SPA is presented below, where 95.23% of the breeding season population has been assigned to adults.</p> <table border="1" data-bbox="1151 866 2134 1201"> <thead> <tr> <th data-bbox="1151 866 1296 1010">Qualifying feature</th> <th data-bbox="1296 866 1476 1010">Predicted mortalities</th> <th data-bbox="1476 866 1664 1010">Latest population and baseline mortality</th> <th data-bbox="1664 866 1816 1010">% increase in baseline mortality</th> <th data-bbox="1816 866 2134 1010">Conclusion</th> </tr> </thead> <tbody> <tr> <td data-bbox="1151 1010 1296 1201">Black-legged kittiwake</td> <td data-bbox="1296 1010 1476 1201">Annual collision mortality of 0.0 to 0.1</td> <td data-bbox="1476 1010 1664 1201">1,348 breeding adults 197 baseline mortality</td> <td data-bbox="1664 1010 1816 1201">0.01 to 0.03</td> <td data-bbox="1816 1010 2134 1201">No risk of an adverse effect on the integrity of the Wicklow Head SPA from the Mona Offshore Wind Project alone.</td> </tr> </tbody> </table> <p>The Applicant considers that the predicted impacts presented on SPA populations are not affected by the two different proportions of adult birds, and all impacts presented are correctly identified and assessed in the Environmental Statement.</p>	Qualifying feature	Predicted mortalities	Latest population and baseline mortality	% increase in baseline mortality	Conclusion	Black-legged kittiwake	Annual collision mortality of 0.0 to 0.1	1,348 breeding adults 197 baseline mortality	0.01 to 0.03	No risk of an adverse effect on the integrity of the Wicklow Head SPA from the Mona Offshore Wind Project alone.
Qualifying feature	Predicted mortalities	Latest population and baseline mortality	% increase in baseline mortality	Conclusion								
Black-legged kittiwake	Annual collision mortality of 0.0 to 0.1	1,348 breeding adults 197 baseline mortality	0.01 to 0.03	No risk of an adverse effect on the integrity of the Wicklow Head SPA from the Mona Offshore Wind Project alone.								

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RR-011.16	<p>Additionally, we do not agree with use of stable age structures from Furness (2015) to apportion to age-classes in the non-breeding season. We suggest that the same approaches are used as for the breeding season, i.e., use site-specific where possible, or take the precautionary approach and assume all 'adult type' birds are adults.</p>	<p>The calculation of apportioning values for age classes in the non-breeding seasons has followed the approach used previously in the application for Development Consent for multiple offshore wind farms (e.g. East Anglia THREE Ltd., 2015, Outer Dowsing, 2024) and is advised for use by Natural England (Parker <i>et al.</i>, 2022). For apportionment, the contribution of adult birds from an individual designated site, as estimated by Furness (2015), to the relevant BDMPS population for each species/season combination is divided by the total BDMPS population.</p>
RR-011.17	<p>Clarification is required as to whether sabbaticals have, or have not, been excluded from the apportioned impacts as it is currently unclear in the documents.</p>	<p>Paragraph 1.3.4.5 of Volume 6, Annex 5.5: Offshore apportioning technical report [APP-095] specifically states "<i>The apportioning assessment carried out for the Mona Offshore Wind Project does not exclude sabbatical birds at the request of the Offshore Ornithology EWG [Expert Working Group] meeting three (held 30/11/2023).</i>"</p> <p>Confusion may arise due to paragraph 1.3.4.5 of Volume 6, Annex 5.5: Offshore apportioning technical report (APP-095) which incorrectly states: "<i>...breeding colony population size estimates, which are used within the Environmental Impact Assessment [Volume 2, Chapter 5: Offshore ornithology (APP-057)] and HRA Stage 2 ISAA (Document Reference E1.1) [HRA Stage 2 Information to Support an Appropriate Assessment, Part Three: Special Protection Areas and Ramsar Sites Assessments (APP-033)] to inform the derivation of the significance of impacts, do not include these sabbatical birds</i>".</p> <p>The Applicant can confirm that sabbaticals have not been removed from any of the assessments as requested by NRW in their section 42 consultation (Consultation Report Appendices - Part 3 (D.25 to F) (APP-040)).</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-011.18	<p>2.1.4.3 Apportionment of impacts to designated sites.</p> <p>Clarification is required on whether the impacts to designated sites has included apportioned impacts to both adults and immatures or just impacts to adults, as the approach is currently unclear. As breeding colony SPAs (such as Grassholm SPA, SSSP SPA) are designated based on breeding individuals or pairs, rather than all birds at the colony, we suggest that the predicted seasonal and annual impacts to these colonies be based on apportioned impacts to adults only. These should be assessed against the adult baseline mortality (using an adult colony figure that is contemporaneous with the site-specific survey data and adult mortality rate).</p> <p><u>Non-breeding season</u> Based on the above, we recommend that the calculation for apportionment of adults to colonies in the non-breeding season should be based on the proportion of the SPA adult birds across the Biologically Defined Minimum Population Scales (BDMPS) total of birds of all ages for each relevant non-breeding BDMPS season as advised in response to the PEIR.</p>	<p>The Applicant can confirm that the impacts apportioned to each SPA in the HRA Stage 1 Screening Report (APP-034) and HRA Stage 2 Information to Support an Appropriate Assessment, Part Three: Special Protection Areas and Ramsar Sites Assessments (APP-033) are for adult birds only in both the breeding and non-breeding period.</p> <p>The Applicant has followed NRW's advice of considering all age classes and has presented separately the proportion of adults and immatures from SPA within BDMPS in table 1.9 and table 1.10 in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report (APP-095). The Applicant confirms that the impacts to designated sites during the non-breeding season are based on apportioned impacts to adults only.</p>
RR-011.19	<p>2.1.4.4. Apportioned impacts from the project alone</p> <p>The apportioned impacts from displacement and resulting % increases to baseline mortality considered in the Stage 1 HRA Screening Report [APP-034] and hence taken through to the assessments in the HRA Stage 2 ISAA for SPAs and Ramsars [APP-033], are based on the Applicant's considered appropriate % displacement and % mortality rates only. To account for uncertainty in displacement and mortality rates, we advise that apportioned impacts and associated increases in baseline mortality across the range of % displacement and % mortality advised and previously agreed with SNCBs during EWGs, are also presented and considered in the assessments. We also advise that where impacts of collision and displacement are assessed that the</p>	<p>The Applicant considers that the most appropriate displacement and mortality rates were included in the Stage 1 HRA Screening Report (APP-034) and the HRA Stage 2 ISAA for SPAs and Ramsar sites (APP-033) to assess the most realistic impact. This is in line with the latest DCO applications (e.g. Awel y Môr) and best practice.</p> <p>The rationale for using a specific displacement rate and mortality rate is fully explained in paragraphs 5.7.2.11 to 5.7.2.27 of Volume 2, Chapter 5: Offshore ornithology (APP-057). The full matrices, including the highest and lowest mortality and displacement rates, are presented in Appendix C of Volume 6, Annex 5.2: Offshore ornithology displacement technical report [APP-092].</p> <p>The complete annual predicted impacts for collision, displacement and collision plus displacement are presented in table A.1 of Appendix A to Volume 6, Annex 5.5: Offshore ornithology apportioning technical report (APP-095).</p> <p>The Applicant considers it overly precautionary to undertake the HRA using the largest displacement impacts, which are not scientifically justified (presented in</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>annual predicted impacts for collision, displacement, and collision plus displacement are presented separately.</p>	<p>paragraphs 5.7.2.11 to 5.7.2.27 of Volume 2, Chapter 5: Offshore ornithology (APP-057) and APEM, 2022). The HRA presented is appropriate and robust for the level of risk presented to SPA and Ramsar sites from the proposed development.</p>
RR-011.20	<p>2.1.4.5. In-combination (HRA Stage 2 ISAA for SPAs and Ramsars, APP-033)</p> <p>The Applicant has taken an approach where if the predicted impact from the project alone equates to less than 0.05% of baseline mortality of a designated site, then the Applicant deems this as “non-material” and within natural fluctuations of the population and is therefore screened out of in-combination assessment. This has resulted in all Welsh SPAs - except Liverpool Bay SPA - being screened out of in-combination assessment. Whilst this approach may be appropriate for this project - where predicted impacts from the project alone are likely very small - it may not be appropriate in other situations, including for designated sites where in-combination impacts are already close to/at levels that are already considered to be of an adverse effect; or designated sites considered to be in unfavourable condition/that have conservation objectives relating to restoration. It also does not mean that impacts from the Mona project should be excluded from in-combination totals for future project assessments.</p>	<p>The Applicant welcomes NRW's agreement that the approach to screening out in-combination assessments is appropriate for the Mona Offshore Wind Project.</p>
RR-011.21	<p>As noted above at 2.1.4.1 to 2.1.4.5, there are several aspects of the assessments that are currently unclear regarding how the predicted impacts have been derived. Additionally, the predicted impacts are based solely on the Applicant's preferred ranges of % displacement and % mortality rates for displacement, and no consideration has been made of the ranges of predicted displacement or collision impacts as advised by the SNCBs.</p>	<p>The Applicant considers that the most appropriate displacement and mortality rates were included in the Stage 1 HRA Screening Report (APP-034) and the HRA Stage 2 ISAA for SPAs and Ramsar sites (APP-033) to assess the most realistic impact. This is in line with recent DCO applications (e.g. Awel y Môr).</p> <p>The rationale for using a specific displacement and mortality rate is fully explained in paragraphs 5.7.2.11 to 5.7.2.27 of Volume 2, Chapter 5: Offshore ornithology (APP-057). The full matrices, including the highest and lowest mortality and displacement rates, are presented in Appendix C of Volume 6, Annex 5.2: Offshore ornithology displacement technical report (APP-092). Full responses to SNCB comments on ranges of predicted displacement or collision impacts are presented in Consultation Report Appendices - Part 3 (D.25 to F) (APP-040).</p>

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		<p>Table A.1 of Appendix A to Volume 6, Annex 5.5: Offshore ornithology apportioning technical report (APP-095) presents the annual predicted impacts for collision, displacement, and collision plus displacement.</p> <p>The Applicant considers it overly precautionary to undertake the HRA using the largest impacts for displacement, which are not scientifically justified (presented in paragraphs 5.7.2.11 to 5.7.2.27 of Volume 2, Chapter 5: Offshore ornithology (APP-057) and APEM, 2022). The HRA presented is appropriate and robust for the level of risk presented to SPA and Ramsar sites from the proposed development.</p>
RR-011.22	<p>Based on the comments above, we advise that the approach / sites and species combinations taken forward for in-combination assessment are revisited once any updates have been made. If this then leads to more sites and species combinations being taken through to in-combination assessments, the comments above regarding cumulative assessments, e.g., errors and gaps in the data, need to be considered.</p>	<p>Whilst it is the Applicant's view (in agreement with NRW) that data gaps associated with historic offshore wind projects are an aspect of cumulative impact assessments that would be better addressed at the strategic level rather than the project level, updates were made to the cumulative impact assessment in response to NRW's (as well as Natural England's and JNCC's) Section 42 advice with respect to historic offshore wind project impacts for the application. These updates also captured additional advice provided by Natural England on 23 October 2023. The cumulative and in-combination assessments presented in Volume 2, Chapter 5: Offshore ornithology (APP-057) and HRA Stage 2 ISAA for SPAs and Ramsar sites (APP-033), respectively, consider the quantitative impact of historic offshore wind projects where it has been possible to derive estimates from project-specific documentation. In the absence of quantitative assessment for historical projects, qualitative assessment has been presented where the information was available. The Applicant remains confident that the approach and cumulative / in-combination assessments presented in Volume 2, Chapter 5: Offshore ornithology (APP-057) and HRA Stage 2 ISAA for SPAs and Ramsar sites (APP-033) are robust, precautionary and provide sufficient detail to conclude no significant effects and no AEOI beyond reasonable scientific, respectively.</p>
RR-011.23	<p>2.1.4.6. Liverpool Bay SPA</p> <p>We welcome the measures listed in the Stage 2 ISAA Part 3 – SPAs and Ramsars [APP-033] of adherence to an offshore Environmental Management Plan (EMP) that will include measures to minimise disturbance to rafting birds from transiting vessels (as set out in APP-203), a timing restriction of no offshore export cable installation during the period 1st November – 31st March within Liverpool Bay</p>	<p>It is the Applicant's intention to secure an offshore EMP in the standalone ML. Please see the Marine Licence Principles Document (J9 Marine Licence Principles Document F02), row 'Project Environmental Management Plan (PEMP)'.</p>

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	<p>SPA, and include a Marine Pollution Contingency Plan (MPCP). We note and agree that the offshore EMP is secured within the dML in Schedule 14 of the draft DCO. This commitment should also be secured in the standalone ML for the cable corridor.</p>	
RR-011.24	<p>We note the timing restriction on offshore export cable installation activities within the SPA will not apply for the trenchless works on the intertidal zone, which will be supported by up to eight vessel movements at the landfall over the winter period. Due to the temporary nature of the activity and the commitment to trenchless works at the landfall (provided appropriately secured in the licence conditions) we do not expect this to result in an AEoSI, but we note that it is currently unclear why the timing restrictions should not apply to this aspect of the works.</p>	<p>The Applicant's commitment to installing export cables from landward of mean low water springs (MLWS) to onshore by trenchless techniques is secured through the Outline landfall construction method statement (APP-226). The Outline landfall construction method statement forms part of the CoCP and is therefore secured under Schedule 2, Requirement 9 of the Draft DCO (C1 Draft Development Consent Order F03). A final landfall construction method statement will be agreed with the local planning authority.</p> <p>The commitment to no offshore export cable laying during the overwintering period (1st November – 31st March) within the Liverpool Bay SPA has reduced flexibility in the construction programme, and therefore the programme of works is more constrained. Prohibiting works at the trenchless techniques exit pits during the overwintering period would add further pressure to the installation window for offshore export cables. Due to this, up to eight vessel movements in total associated with the construction works at the landfall may be required during the overwintering period to maintain the construction programme and to allow flexibility for works when required. This was discussed with NRW and Natural England during pre-application monthly meetings and the Applicant notes NRW's comments in the meeting minutes for the sixth offshore ornithology EWG meeting (Technical Engagement Plan Appendices - Part 1 (A to E) (APP-042)) 'Given that: any disturbance impact to features of the SPA will be temporary for the time of the vessel presence; birds will be able to return once the vessel has gone; there will be other habitat available within the SPA to the birds for the time they are disturbed from the landfall area; up to 8 movements across the key winter period of Nov-Mar represents a small proportion over this timescale; and a commitment to HDD for landfall has been made, NRW Advisory do not expect this temporary activity to result in an AEOSI'. The Applicant also notes an email dated 26/03/2024 Natural England stated that "In line with NRW's comments on the 8 vessel movements within Liverpool Bay SPA, up to 8 movements across the key winter period of November-March represents a small proportion over this timescale; and a commitment to HDD for landfall has been made, therefore NE do not expect this temporary activity to result in an AEOSI.</p>

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RR-011.25	2.1.5. We advise that Table 4 of the design parameters in Schedule 14 Part 2 of the draft DCO [APP-023] should also include the maximum rotor swept area. This is because as the table currently reads it could be interpreted that 96 turbines of 364m LAT in height, with a rotor diameter of 320m, could potentially be installed at the site.	It is not the Applicant's intention to seek consent for 96 turbines with a height of 364m but for the Development to be built using turbines within the range of 96 of the smallest turbines and 68 of the largest turbines. Further information is provided in paragraph 3.5.5.1 of the Volume 1, Chapter 3: Project Description (APP-050). The Applicant has updated the draft DCO (C1 Draft Development Consent Order F03) to include a parameter for the rotor swept area.
RR-011.26	2.2 Marine Mammals 2.2.1 NRW (A) agrees with the data collected through surveys and literature including the data sources used to characterise the baseline, as well as the management unit approach adopted [APP-056] (although please note comment 2.2.9 below), as discussed through the various EWGs. We agree with the majority of the conclusions in the ES and HRA, unless listed in the representations below.	The Applicant notes NRW's response.
RR-011.27	2.2.2 Injury and disturbance to marine mammals from elevated underwater sound due to vessel use and other (non-piling) sound producing activities  <b>KEY CONCERN:</b> We acknowledge and welcome the information provided with regard to vessel traffic data (Vol. 2, Chapter 4 Mona ES – Marine Mammals; Figs 4.24 & 4.25) [APP-056], as well as the information provided in Vol. 6, Annex 7.1: Navigational Risk Assessment (NRA) [APP-098] of the ES. However, there is inadequate justification for an overall conclusion of low magnitude. We note that the estimated numbers of animals disturbed by vessels and any subsequent conclusions are based on static impact radii. Given the known sensitivity of harbour porpoise, in particular to vessel noise, and the increase in the number of vessels in the area compared to baseline vessel traffic, we advise that the assessment is revised and quantified both for the project alone and in-combination with other projects.	See Applicant's Response to Relevant Representation from Natural Resources Wales (NRW): Vessel Use (Document Reference S_PD_3.1).
RR-011.28	2.2.3 Injury from elevated underwater sound due to piling  We note a conclusion of negligible magnitude has been assigned based on the inclusion of the potential indicative use of designed-in measures (30 minutes of Acoustic	The Applicant acknowledges the potential effect of ADDs themselves should not be overlooked. The Applicant agrees that the reliance on ADDs as a primary mitigation tool should be considered carefully and on a case-by-case basis, but this does not change the outcome or robustness of the assessment in Volume 2, Chapter 4: Marine mammals (APP-056), which uses an indicative 30 minutes of

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Reference	Relevant Representation Comment	Applicant's response
	<p>Deterrent Devices (ADDs)). However, whilst we acknowledge that the proposed mitigation strategy outlined in the ES [APP-056], Marine Mammal Mitigation Protocol (MMMP) [APP-207] and Underwater Sound Management Strategy (UWSMS) [APP-202] is to be agreed post-consent, we note that any additional disturbance caused as a result of the large-scale use of ADDs has not been considered. We advise that this needs consideration, as evidenced by Elmegaard et al (2023), which demonstrates that harbour porpoise show very strong flight and physiological responses to ADD use far beyond the intended mitigation zone. Energetic responses to noise may have a cumulative effect on health if they occur frequently enough, particularly for porpoise who are thought to need to forage constantly to meet their energy demands.</p>	<p>ADD activation. The use of an ADD contributes an additional 30 minutes of underwater sound to the underwater sound from piling (up to a total of 4.5 hours of piling per pile; Table 4.16 in Volume 2, Chapter 4: Marine mammals (APP-056)), however, the magnitude of effects from the ADD (i.e. range over which disturbance could occur) is considerably lower compared to piling (see below for more detail on ADD disturbance ranges). It is acknowledged that ADDs were not assessed separately in the Application for disturbance to marine mammals (although they were factored into the assessment for injury; Table 4.25 and Table 4.26 in Volume 2, Chapter 4: Marine mammals (APP-056)), however, the Applicant highlights that this approach is typical for OWF assessments and that neither during the EWG consultation process nor in the S42 response, this concern was not raised by NRW or other stakeholders. The Applicant also highlights that the assessment of disturbance effects due to elevated underwater sound is, in any case, precautionary as the population model assumes that for days on which there is piling (and therefore the same days on which the ADD is activated), marine mammals would be disturbed for the entire day plus the subsequent day over the ranges predicted for piling. Thus, given that the ranges of disturbance during ADD activation are considerably less than those predicted for piling and that ADD activation forms part of the piling construction sequence, it is not considered necessary to consider this as a separate impact as essentially it is captured in the assessment of disturbance from piling. The Applicant, therefore, maintains that the assessment is precautionary and conclusions of significance are valid with respect to disturbance from ADDs.</p> <p>The Application also highlights that the 30 minute activation period is not a fixed time period and the final ADD duration will be agreed post-consent in the final MMMP (as secured under Schedule 14, Condition 18(1)(i) within the Draft DCO (C1 Draft Development Consent Order F03) and Outline MMMP (APP-207)), in consultation with relevant stakeholders including NRW, and will consider the balance between allowing an animal time to move away from the injury zone and reducing unnecessary additional noise which may cause disturbance.</p> <p>In reference to the paper highlighted by NRW, Elmegaard <i>et al.</i> (2023) investigated the physiological and behavioural responses of harbour porpoise to a commercial ADD in Danish waters. Six harbour porpoises were tagged with DTAGs (sound and movement recording tags), recording sound, 3D-movement, and GPS or electrocardiogram and were then exposed to ADDs for 15 minutes. All animals displayed a mixture of acoustic startle responses, swimming away responses, altered echolocation behaviour, and increased heart rate while diving. However, five harbour porpoise (out of six) returned to feeding within 16 to 42</p>



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		<p>minutes after exposure to the ADD (the tag fell off the sixth harbour porpoise, shortly after exposure). The study demonstrated harbour porpoise reacted to ADDs more than 7 km from the ADD (consistent with identified 7.5 to 12 km ranges by other similar studies (Brandt <i>et al.</i>, 2013; Dähne <i>et al.</i>, 2013)). Therefore, whilst deterrence devices need to be effective to avoid auditory injury from construction activities, the risk and effect caused by the deterrence should not exceed the risk and effect of the activity the animals are deterred from.</p> <p>Therefore, the Applicant understands the need for proportionate and judicious application of ADDs, and this will be considered carefully when finalising the ADD deployment duration post consent but does not change the conclusions or validity of the assessment within Volume 2, Chapter 4: Marine mammals (APP-056).</p>
RR-011.29	<p>2.2.4 Barrier effects Limited justification has been provided for the absence of cumulative assessment of barrier effects. Clarification and potentially further assessment is required.</p>	<p>Following S42 responses, the potential barrier effects from Mona Offshore Wind Project have been considered within Volume 2, Chapter 4: Marine mammals (APP-056) for grey seal, harbour seal and bottlenose dolphin. The project alone assessment concluded there would be no barrier effects from the Mona Offshore Wind Project, and therefore, any contribution from the Mona project to cumulative barrier effects is unlikely.</p> <p>As stated under sections 4.9.3.94 and 4.9.3.110 of APP-056, it is considered that grey seal and harbour seal close to the coast could experience very mild disturbance but that this would be highly unlikely to lead to barrier effects (i.e. preventing animals from using the foraging grounds in waters along the coast), as animals are unlikely to be excluded from the coastal areas. Underwater sound contours modelled at the SE location (i.e. closest to areas of high grey seal density) show that 145 dB re 1µPa SEL<sub>ss</sub> contours (i.e. level expected to result in any behavioural reactions) do not reach the high density areas in the Dee Estuary and therefore as given in sections 4.9.3.94, no barrier effects on seals travelling to or from haul-out sites are expected. As stated in section 4.9.3.95, grey seal could move to alternative foraging grounds during piling, or avoid the offshore areas entirely where received levels during piling exceed thresholds for strong disturbance close to the piling location. Whilst some short-term avoidance in marine mammals has been shown during piling and other construction activities (Benhemma-Le Gall <i>et al.</i>, 2021, Graham <i>et al.</i>, 2019, Graham <i>et al.</i>, 2017, Russell <i>et al.</i>, 2016), there is evidence that seals exposed to pile-driving at close range, even at distances shorter than 30 km, returned to the same area on subsequent trips (Aarts <i>et al.</i>, 2018). Animals exposed to the lower sound levels in the outer disturbance contours are likely to experience mild disruptions of normal</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>behaviours but prolonged or sustained behavioural effects, including displacement, are unlikely to occur (Southall <i>et al.</i>, 2021).</p> <p>As stated under paragraph 4.9.3.67 of APP-056 for bottlenose dolphin, it is considered that animals are unlikely to be excluded from the coastal areas given the low-level disturbance reaching the coast and, therefore, unlikely to lead to barrier effects which would prevent movement between Cardigan Bay and the Isle of Man or around the coastline (given the inshore ecotype in the Irish Sea). Bottlenose dolphin are highly mobile and frequently travel large distances across the Irish Sea. As set out in section 4.9.3.67 of APP-056, potential levels of underwater sound near the coast are predicted to reach maximum SEL<sub>ss</sub> levels of 135 dB, which is broadly equivalent to 145 re 1 µPa SPL<sub>rms</sub> and therefore below the NMFS (2005) threshold for strong disturbance (=160 re 1 µPa SPL<sub>rms</sub>) and therefore likely to elicit less severe disturbance reactions. Barrier effects which prevent movement around the coast are, therefore, highly unlikely (4.9.3.67 of APP-056). Detailed in section 4.9.3.67 of APP-056, area-based modelled contours for mild disturbance (140 re 1 µPa SPL<sub>rms</sub>) could potentially overlap coastal habitats. However, these are likely to be low-level marine mammal disturbances, such as small disruptions of behaviour, but no displacement or prevention of regular movements is predicted to occur, and animals are expected to recover quickly.</p> <p>Furthermore, underwater sound from construction activities will be temporary, localised, and not continuous across the offshore construction period, and animals are likely to have recovery time between activities. Any areas affected would be relatively small in comparison to the range of marine mammals. Therefore, there is unlikely to be the potential for any barrier effects that could significantly restrict the movements of marine mammals.</p> <p>Therefore, for the Mona Offshore Wind Project alone, there are no barrier effects for key species which utilise coastal areas (grey seal, harbour seal or bottlenose dolphin) and consequently no potential for cumulative effects in combination with other projects. It is acknowledged in Section 4.11.2 the Volume 2, Chapter 4 Marine Mammals [APP-056] that if piling at Mona Offshore Wind Project coincides exactly with piling at other nearby wind farms (e.g. Awel y Mor, Morgan Offshore Wind Project), there may be potential for larger areas of strong disturbance, however, these areas of strong disturbance are highly unlikely to overlap temporally and the area of overlap of strong disturbance (i.e. the level to induce barrier effects or displacement) is expected to be very small given the extent of the 160 dB re 1µPa SPL<sub>rms</sub> contour from the project alone (see Figure 4.13 in Volume 2, Chapter 4 Marine Mammals [APP-056]). As discussed in Volume 2, Chapter 4</p>

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		<p>Marine Mammals [APP-056]) and Part Two: Special Areas of Conservation (SACs) Assessment of the HRA Stage 2 Information to Support an Appropriate Assessment (APP-032), different projects utilise different approaches to assessing strong disturbance so direct quantification of overlapping areas (e.g. comparing 160 dB threshold versus EDR ranges versus 143 dB threshold) would not be appropriate but in the context of the wider habitat available within the Irish Sea and wider Celtic Sea regional marine mammal study area, and the relevant MU's used in the assessment, it is not anticipated that cumulative impacts will result in a significant barrier effect.</p> <p>Furthermore, the Applicant has committed to preparing and implementing an Underwater Sound Management Strategy (UWSMS) in accordance with the Outline UWSMS (APP-202), which includes consideration of potential impacts from cumulative piling, and therefore, any potential cumulative disturbance effects are likely to be further reduced with the implementation of the final UWSMS which will be issued to NRW for approval post consent. As stated in section 2.2.6.1 of NRW's Relevant Representation, NRW welcomes the UWSMS and agrees the UWSMS could reduce the magnitude of impacts to an acceptable level. The Applicant considers, therefore, that NRW agrees this is a solid platform for managing underwater sound.</p>
RR-011.30	<p>2.2.5 Interrelated effects</p> <p>There is inadequate justification for the conclusion that the effects on marine mammal receptors are not anticipated to interact in such a way as to result in combined effects of greater significance than the assessments presented for each individual phase, or when considered in conjunction with other topics addressed in the ES. We advise that this is addressed.</p>	<p>See Applicant's Response to Relevant Representation from Natural Resources Wales (NRW): Interrelated Effects (Document Reference S_PD_3.2).</p>
RR-011.31	<p>2.2.6 Outline Underwater Sound Management Strategy (UWSMS)</p> <p>2.2.6.1. We welcome the inclusion of an outline UWSMS [APP-202] and acknowledge the commitments made therein by the Applicant to reducing residual impacts and the use of noise attenuation technologies, if required. We agree that the UWSMS could reduce the magnitude of impacts to an acceptable level. It should be noted, however, that whilst we</p>	<p>The Applicant welcomes NRW's comments. A final version of the UWSMS will be agreed with NRW post-consent, as secured through the deemed marine licence of the draft DCO (see Schedule 14, Part 2; C1 Draft Development Consent Order F03).</p>

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	<p>anticipate that the proposed mitigation methods may be sufficient to support the current conclusions of “not significant”, the strategy as currently presented is high-level. We will work with the Applicant on further developing the UWSMS during examination and post-consent. We agree with the intention to secure the strategy through the dML and the standalone ML.</p>	
RR-011.32	<p>2.2.6.2 We also note that there appear to be a number of inconsistencies within several application documents, including, for example the UWSMS, the ES Project description [APP-050] and several ES chapters, where it is stated that Offshore Substation Platforms (OSP's) will be attached to the seabed with foundation structures using either three, four or six-legged piled jacket foundations. However, it is stated elsewhere that the Maximum Design Scenario (MDS) includes four OSP's four-legged jacket foundations, which contradicts the maximum value of six legs stated elsewhere. Whilst we appreciate that the Worst-Case Scenario (WCS) alters per receptor, these inconsistencies are present throughout. We advise that the Applicant corrects these discrepancies and provides clarity on this matter.</p>	<p>Mona OSP jacket foundation options could be three, four or six legged jacket foundations as set out in Table 3.10 of Volume 1, Chapter 3: Project description (APP-050). The marine mammal (APP-056) and fish and shellfish ecology (APP-055) assessments consider up to four OSPs with four-legged jacket foundations as the maximum design scenario, as the six-legged jacket would only be deployed under the scenario where a single large OSP is installed.</p> <p>The MDS for marine mammals, therefore, is a total of 48 piles (4 OSPs x 4 legs x 3 piles per leg) and, therefore, is the maximum number of piles resulting in the maximum disturbance due to underwater sound. A maximum of one OSP would be required with a six-legged jacket foundation, resulting in fewer piles (1 OSP x 6 legs x 3 piles per leg=18).</p>
RR-011.33	<p>2.2.7. Underwater Sound Technical Report [APP-079]/ Mona ES Marine Mammals [APP-056]:</p> <p>Whilst we do not disagree with the overall conclusion of minor adverse significance (disturbance and injury) for site investigation surveys, the impact ranges for sparkers appears relatively small in contrast with the non-pulsed sub-bottom profiler methods presented. Given sparkers tend to be more omnidirectional source, they would be expected to have a bigger impact range. Further explanation would be welcomed.</p>	<p>As detailed in Table 1.11 of the Underwater Sound Technical Report (APP-079) the source level for the sub-bottom profilers (SBP) is up to 240 dB re 1 <math>\mu</math>Pa (rms), which for a pulse width of 1.5 metres per second (ms) (Table 1.11 in APP-079) equates to a per pulse Sound Exposure Level (SEL) of 212 dB re 1 <math>\mu</math>Pa<sup>2</sup>s or, assuming the worst case rate of 4 pulses per second (Table 1.11 APP-079), a per second SEL of 218 dB re 1 <math>\mu</math>Pa<sup>2</sup>s.</p> <p>In contrast, the per pulse SEL of the sparker is 182 dB re 1 <math>\mu</math>Pa<sup>2</sup>s, which is ~30 dB lower than the SBP. Furthermore, the sparker shot rate is lower (once every 1.5 second) than the SBP (four times per second). It is also worth noting that the frequency range for the sparker (up to 4 kHz) sits outside the peak sensitivity of HF and VHF cetaceans, whereas the SBP worst case reaches up to 14 kHz, which is within the most sensitive region for these hearing groups.</p> <p>Therefore, the modelling in the underwater sound technical report (APP-079) (on which the marine mammal assessment (APP-056) has been based) has been undertaken using compounded worst-case assumptions, including:</p>

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Reference	Relevant Representation Comment	Applicant's response
		<ol style="list-style-type: none"> <li>1. That the highest possible source level will be used during the survey;</li> <li>2. That the fastest pulse rate will be used;</li> <li>3. That the longest pulse duration will be used;</li> <li>4. Where frequencies are selectable, the worst-case (in terms of potential injury range) frequencies will be used</li> </ol> <p>In reality, it is unlikely that all these compounded worst-case assumptions would occur at once. Pulse rate and pulse duration are selected based on factors such as water depth to ensure that each pulse can be reflected back before the next pulse is transmitted in order to avoid interference between pulses. Therefore, it is the Applicant's understanding that using a faster pulse rate would necessitate the use of a shorter pulse duration. Likewise, higher source levels would only be selected where required for operational reasons, for example, where there are issues detecting the reflected pulse due to a low signal-to-noise ratio.</p> <p>Consequently, real-world permanent threshold shift (PTS) and temporary threshold shift (TTS) ranges are likely to be lower than the worst-case scenarios predicted in the assessment under section 4.9.7 of APP-056 and therefore the assessment has applied the precautionary principle, and the conclusions remain valid and robust.</p>
RR-011.34	<p>2.2.8. Mona ES Marine Mammals [APP-056] / Mona ISAA Special Areas of Conservation [APP-032]:</p> <p>For impulsive sources, both APP-056 and APP-032 reference that changes in the impulsive characteristics of impulsive sound at range implies that disturbance thresholds for piling noise should be considered precautionary at long range (i.e. a few kilometres). While this may be plausible for thresholds derived from observations close to the source, NRW (A) does not agree with this conclusion, given that the dose response curves applied as thresholds for piling noise, as well as the 143 dB single strike Sound Exposure Level (SEL) threshold, are based on field observations collected at up to several km from piling activities. We recommend that this technical error is rectified for this project and future projects adopting the same techniques.</p>	<p>The recent Offshore Renewables Joint Industry Programme (ORJIP) report (ORJIP Offshore Wind, 2024), of which NRW is part of the Project Expert Panel, showed a decrease in impulsiveness as sounds travel further away from the source. Four metrics of impulsiveness collected from the pile driving dataset (kurtosis, crest factor, peak sound pressure level, and high frequency content) were modelled to investigate changes with range and other variables and to assess at what distance impulsive sounds transition to being non-impulsive, based on thresholds from the scientific literature. Whilst it was not possible to establish a range of distances from which these sounds are no longer impulsive, a marked decrease was noted in all metrics of impulsiveness within the first five kilometres from the piling location.</p> <p>Ignoring the characteristics of the sound in question disregards everything that affects what an animal responds to, other than the sound level. Clearly, frequency content (as well as impulsivity, i.e. time-based characteristics) will have a bearing on the response. At these much larger ranges, the original impulse has dispersed to such an extent that the different frequencies of sound all arrive at different times and the pulse is spread out to become something completely different, more like continuous sound, and with a different frequency characteristic. The dose-response approach differs from a threshold approach in that it assumes a</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>particular received sound level (in single strike Sound Exposure Level (SEL<sub>ss</sub>)) equates to a specific proportional response. However, these ranges predicted for Mona are much larger than the ranges measured in the Beatrice study (which was used to develop the dose-response curve), meaning that the frequency spectrum of sound used to derive the dose-response for Beatrice will differ and, for the same sound level (measured as SEL<sub>ss</sub>), the proportion of animals affected would likely be greater at closer distances compared to larger distances as the pulse characteristics of the sound are less dispersed. Thus, a proportional response curve from a study predicting smaller ranges will be more conservative when applied to a study predicting larger ranges. At these larger ranges, most of the sound within the peak hearing sensitivity of harbour porpoise will have dissipated, leaving primarily low frequency sound, which they are less sensitive to and may not even be able to hear.</p> <p>As discussed in paragraph 4.9.2.27 <i>et seq.</i> of the assessment (Volume 2, Chapter 4 Marine Mammals [APP-056]), the 143 dB re 1µPa<sup>2</sup>s unweighted threshold for harbour porpoise was derived from empirical data collected from different OWF monitoring studies in German looking at behavioural response (Brandt <i>et al.</i>, 2018). In 6 out of 7 of the wind farms, noise mitigation systems (NMS) were applied at the source to reduce the received noise levels; therefore, again the ranges of disturbance would be smaller compared to Mona in which case the frequency content would differ and again the application of this threshold to the Mona assessment (as recommended by NRW) would be conservative.</p> <p>In summary, the Applicant considers the statement “should be considered precautionary at long range (i.e. a few kilometres)” aligns with the latest scientific guidance and the dose response curves and 143 dB single strike Sound Exposure Level (SEL) used in the assessments (EIA and HRA) are considered to be conservative. Therefore, the validity of the assessment within Volume 2, Chapter 4: Marine mammals (APP-056), and the conclusions of significance or LSE still stand.</p>
RR-011.35	<p>2.2.9. Mona ISAA Special Areas of Conservation [APP-032]</p> <p>In line with NRW's position statement on use of Management Units, in view of the strong evidence supporting the idea that the populations of Cardigan Bay and Pen Llyn a'r Sarnau Special Areas of Conservation (SAC) are highly connected, and that there is likely a single genetic population across the management unit, when</p>	<p>The Applicant notes that this request was not highlighted in S42 responses or raised throughout the EWG process by NRW but notes the connectivity of bottlenose dolphin between the coastal waters of the English/Welsh coast and the Isle of Man has been considered in detail in the HRA.</p> <p>In line the NRW Position Statement on 'the use of Marine Mammal Management Units (MMMUs) for screening and assessment in Habitats Regulations Assessments for Special Areas of Conservation (SACs) with marine mammal features' (NRW, 2022) which states “<i>For bottlenose dolphin: An Appropriate</i></p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>conducting an appropriate assessment, the two protected sites should be considered together.</p>	<p><i>Assessment should be carried out on both bottlenose dolphin SACs: Pen Llŷn a'r Sarnau and Cardigan Bay</i>", an Appropriate Assessment has been carried out on both bottlenose dolphin SACs: Pen Llŷn a'r Sarnau and Cardigan Bay (see Mona ISAA Special Areas of Conservation Assessments, APP-032).</p> <p>Both sites have been considered in detail separately as per the HRA process, and the information is sufficient for the competent authorities to undertake the assessment. The bottlenose population is considered as a single population that may inhabit either site and the Irish Sea MU covers this single population. However, for HRA purposes, sections 1.7.3 and 1.7.4 of the assessment in APP-032 considers the effect on bottlenose dolphin as a feature of a particular site against that site's conservation objectives and therefore it is not suitable to combine the two sites as such but noting that both sites are assessed against a single population.</p> <p>For piling, there was no overlap of the 160 dB re 1 µPa SPLrms (strong disturbance) contour with either the Llyn Peninsula and the Sarnau/Pen Llŷn a'r Sarnau SAC and Cardigan Bay/Bae Ceredigion SAC, and the assessment detailed that piling would not impede the movement of bottlenose dolphin within this region. There was no residual risk of injury during piling for either SAC.</p> <p>The ISAA Special Areas of Conservation Assessments (APP-032) concluded that for all impacts assessed for Pen Llŷn a'r Sarnau/Llyn Peninsula and the Sarnau SAC, there was no adverse effect on the integrity of the site. Similarly, for Cardigan Bay/Bae Ceredigion SAC, APP-032 concludes there is no adverse effect on the integrity of the site for all impacts.</p>
<p>RR-011.36</p>	<p>2.2.10. Mona ISAA Stage 1 Screening [APP-034]:</p> <p>Explanatory notes in APP-034 for table 1.40: LSE matrix for Rockabill to Dalkey Island SAC have not been included for grey seal. For table 1.51: LSE matrix for the Chaussée de Sein SCI, cells for which a conclusion of no LSE (Likely Significant Effect) has been made should be highlighted in green. In order to provide confidence in the screening assessments presented, we advise that these changes are made.</p>	<p>The Applicant thanks NRW for highlighting the Explanatory Notes for Table 1.40 in APP-034 do not include grey seal. According to NPWS (2013), Rockabill to Dalkey Island SAC is designated for the Annex II species harbour porpoise only (as detailed correctly in Table 1.6: European sites designated for Annex II marine mammal species taken forward for determination of LSE). The Applicant acknowledges that grey seal has been included in Table 1.40 in error. Therefore, the explanatory notes below the table, which cover harbour porpoise only, are correct and the outcome of the LSE screening for this SAC is unchanged.</p> <p>The Applicant thanks NRW for highlighting that in Table 1.51 for Chaussée de Sein SCI, as detailed in Section 1.4.2 of APP-032, those cells marked with X's mean there is no potential for an LSE and therefore the screening assessment itself is correct and valid. However, the Applicant confirms those cells with X's (no LSE) should be green, and therefore for grey seal: Underwater sound from Piling, Underwater sound from Clearance of UXO, Underwater sound during site</p>

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Reference	Relevant Representation Comment	Applicant's response
		investigation surveys, Underwater sound due to vessel use and other activities, and In-combination Effects should be green.
RR-011.37	<p>2.2.11. Mona ISAA Stage 2 Special Areas of Conservation [APP-032], Table 1.85 Summary of SPLpk PTS injury ranges and areas of effect for marine mammals for single pin pile installation (N/E = threshold not exceeded)</p> <p>For grey seal, the initiation (first strike) impact range at 4,400kj should be 28m rather than 25m, in accordance with the underwater noise and ES chapters. We advise that this is corrected.</p>	The Applicant notes NRW's response. The initiation (first strike) impact range at 4,400 kJ should be 28 m, however, this does not change the conclusions of the assessment.
RR-011.38	<p><b>2.3 Fish and Shellfish Ecology</b></p> <p>2.3.1 NRW (A) agrees that the data collected through the site-specific surveys and through the desktop review of existing literature and data sources are sufficient to appropriately characterise the fish ecology for the project.</p>	The Applicant notes NRW's response.
RR-011.39	2.3.2. We agree with the assessment methodology and conclusions for impacts to fish from construction, operation and decommissioning activities (but please see 2.3.4 below).	The Applicant notes NRW's response.
RR-011.40	2.3.3. We agree with the screening undertaken in the HRA Screening report (document reference E1.4 [APP-034]) and the subsequent Stage 2 assessment (document reference E1.2 [APP-032]) and agree with the overall conclusion of no risk of an adverse effect on the integrity of diadromous fish features from the Welsh protected sites; Dee Estuary/Aber Dyfrdwy SAC, River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC, and Afon Gwyrfa a Llyn Cwellyn SAC.	The Applicant notes NRW's response.
RR-011.41	2.3.4 <b>KEY CONCERN:</b> We do not agree that, for the project 'alone', impacting 21.64% of the cod high intensity spawning habitat as a result of disturbance from underwater noise can be assessed as minor. We advise that, by adopting the approaches applied for herring, that the impact should be assessed as moderately adverse during the breeding season.	The potential impacts on cod high intensity spawning habitat in relation to the underwater sound impacts arising from construction activities have been assessed and presented in section 3.9.3 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). Approximately 21.64% of the high intensity cod spawning grounds within the study area are predicted to be impacted by underwater sound. However, the total area is not the only factor taken into account when assessing the significance of the overall impact on cod, and this approach has been informed by consultation with the MMO.



Reference	Relevant Representation Comment	Applicant's response
		<p>Specifically, in line with advice provided by the MMO on the Mona Offshore Wind Project PEIR through Section 42 consultation (see sections 4 and 5 of the Consultation Report (APP-037)), the degree of overlap with mapped spawning grounds is not used to underpin the assessment but is considered to support expert judgement alongside other parameters. This is due to mapped spawning grounds not reflecting hard boundaries (i.e. spawning of high or low intensity may occur in areas mapped as either intensity, or in areas not mapped as spawning grounds at all), and for those spawning grounds presented in Ellis <i>et al.</i> (2012), the low degree of spatial resolution, given that these mapped grounds are extrapolated to ICES Rectangle scale.</p> <p>A number of factors are considered when defining the magnitude of impact, including consideration of the maximum area of overlap with mapped high intensity spawning grounds, including:</p> <ul style="list-style-type: none"> <li>• The extent of suitable habitat for cod spawning <ul style="list-style-type: none"> <li>– I.e. the mapped cod grounds presented in Ellis <i>et al.</i> (2012) extend across much of the east Irish Sea, with further important spawning grounds within the west Irish Sea.</li> </ul> </li> <li>• The short term and intermittent nature of the impact (a maximum design scenario of 114 days of piling over two years, within a four-year construction phase)</li> <li>• The high degree of reversibility of the impacts of underwater sound from piling</li> <li>• The likely timing of piling activities <ul style="list-style-type: none"> <li>– Noting that operational constraints associated with weather conditions are expected to limit operational efficacy during the winter period, which extends into the cod spawning season of January to April.</li> </ul> </li> </ul> <p>Whilst for herring, the mapped spawning grounds defined by Coull <i>et al.</i> (1998) are known to be highly discrete (due to the substrate specificities of this species), the mapped high intensity cod spawning grounds occupy a large extent of the fish and shellfish ecology study area, and beyond into the west Irish Sea, with the entirety of the east Irish Sea considered suitable spawning ground for cod.</p> <p>Therefore, in the context of available spawning habitat for cod within the Irish Sea, combined with the abovementioned short-term, intermittent and reversible nature of the impact, the magnitude of impact for the project alone is considered low, and the overall significance of effect is considered minor adverse which is not significant in EIA terms.</p>

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RR-011.42	<p>2.3.5 We consider that whilst some of the issues relating to the assessment of impacts to fish from underwater sound have been resolved, some concerns relating to clarity in the ES [APP-055] as raised in advice to the PEIR remain outstanding. For example, in response to the PEIR we requested that the Popper et al. (2014) Sound Exposure Guidelines for fishes and sea turtles, were used in assessing impacts from underwater sounds and specifically that sound levels from impact piling were described using Cumulative Sound Exposure Levels (SELcum) to reflect the cumulative exposure from the total piling event. We consider the SELcum threshold is likely to be lower than the Peak Sound Pressure Levels (SPLpk) used to assess the percentage of cod spawning habitat affected and therefore, the 21.64% presents a potential underestimate of the area ensonified. This has not been done by the Applicant. Such outstanding issues creates difficulty in advising as to whether a realistic worst-case assessment for piling noise has been presented.</p>	<p>Popper <i>et al.</i> (2014) Sound Exposure Guidelines for fishes and sea turtles were used in assessing impacts from underwater sound, and sound levels from impact piling were described using Cumulative Sound Exposure Levels (SELcum) to reflect the cumulative exposure from the total piling event.</p> <p>The impulse piling criteria from Popper <i>et al.</i> (2014) is presented in Table 3.20 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055) and is applied using the SELcum metric in Tables 3.22, 3.23, 3.24 and 3.25 for piling. Temporary Threshold Shift (TTS), recoverable injury and mortality/mortal injury ranges are illustrated in Figure 3.8 and 3.10 for herring, and in Figure 3.9 and 3.11 for cod with their respective mapped spawning grounds from Coull <i>et al.</i> (1998) and Ellis <i>et al.</i>, (2012) respectively.</p> <p>These figures are presented using the SELss metric, with contours derived by underwater sound modelling specialists from conversion of the SELcum contours for moving and static group 3 and 4 fish receptors for TTS, recoverable injury and mortality (thresholds from Popper <i>et al.</i>, 2014). The representative contours are listed below for each scenario.</p> <p>Using the SELss contours (derived from the SELcum contours) presented in Figures 3.9 and 3.11 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055) the thresholds from Popper <i>et al.</i> (2014) represent the following maximum percentage overlaps with mapped high intensity cod spawning grounds:</p> <ul style="list-style-type: none"> <li>• TTS (148.5 dB SELss) for moving group 3 and 4 fish during piling at the north location is predicted to overlap with <b>10.22%</b> of mapped high intensity cod spawning ground.</li> <li>• Recoverable injury (190 dB SELss) for moving group 3 and 4 fish during piling at the north location is predicted to overlap with <b>0.0001%</b> of mapped high intensity cod spawning ground.</li> <li>• TTS (146 dB SELss) for static group 3 and 4 fish during piling at the north location is predicted to overlap with <b>14.66%</b> of mapped high intensity cod spawning ground.</li> <li>• Recoverable injury (162 dB SELss) for static group 3 and 4 fish during piling at the north location is predicted to overlap with <b>0.91%</b> of mapped high intensity cod spawning ground.</li> <li>• Mortality (166 dB SELss) for static group 3 and 4 fish during piling at the north location is predicted to overlap with <b>0.24%</b> of mapped high intensity cod spawning ground.</li> </ul>

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Reference	Relevant Representation Comment	Applicant's response
		<p>These modelled affected areas, based upon the north piling location, highlight the precautionary nature of using 160 dB SPL<sub>pk</sub> to assess behavioural effects. TTS, which is often used as a proxy for behavioural effects (using SEL<sub>ss</sub>, derived from SEL<sub>cum</sub>), for both static and moving group 3 and 4 fish receptors represents smaller areas of maximum overlap with the mapped high intensity cod spawning ground defined by Ellis <i>et al.</i> (2012) than when using 160 dB SPL<sub>pk</sub>. This demonstrates that the potential area of ensonification during piling has not been underestimated within the Application and highlights the precautionary approach employed to ensure a robust and valid assessment.</p>
RR-011.43	<p>2.3.6 We welcome the inclusion of an outline UWSMS [APP-202] but note that this is currently high-level. Whilst we acknowledge that further detail cannot be populated at this time, we consider it likely that the UWSMS could potentially reduce the magnitude of impacts to an acceptable level. We welcome the commitment of the Applicant to continue to engage with NRW (A) to develop the USWMS during examination and post-consent. We agree that the UWSMS be conditioned through both the dML and ML. NRW (A) welcomes the opportunity to engage with the Applicant on developing the UWSMS during the examination and post-consent.</p>	<p>The Applicant welcomes confirmation from NRW regarding the appropriateness of the UWSMS to secure the reduction of the magnitude of impacts to an acceptable level. The UWSMS is secured in the deemed Marine Licence (APP-023) and also suggested for inclusion in the standalone NRW Marine Licence (see the draft Marine Licence Principles Document (APP-195)).</p>
RR-011.44	<p>2.3.7. As noted in 2.2.6.2 for Marine Mammals, there appear to be a number of inconsistencies across the application, for example with respect to the exact number of OSP legs that are considered to be the WCS. Whilst we appreciate that the WCS alters per receptor, these inconsistencies lie within receptor chapters e.g., Marine Mammals APP-056, Fish and Shellfish APP-055, and Project Description APP-050. We advise that clarity is required throughout the documentation.</p>	<p>Mona OSP foundations could be three, four or six-legged jacket foundations. This is outlined in Table 3.10 of Volume 1, Chapter 3: Project Description (APP-050). The marine mammal and fish and shellfish ecology assessments consider up to four OSPs with four-legged jacket foundations as the maximum design scenario. This is a total of 48 piles (4 OSPs x 4 legs x 3 piles per leg) and, therefore, is the maximum number of piles resulting in the maximum disturbance due to underwater sound.</p>
RR-011.45	<p>2.3.8. We note from paragraph 1.5.4.10 in document APP-186 and paragraph 3.11.9.1 of APP-055 that whilst not currently planned, the Applicant will commit to future monitoring of fish and shellfish ecology, if relevant. Whilst not essential to the project (as mitigation measures are proposed to manage potential impacts), such future monitoring is encouraged in National Policy Statement (as recognised in the NPS for Renewable Energy Infrastructure</p>	<p>The Applicant acknowledges that paragraph 1.5.4.10 of the Planning Statement (APP-186) refers to “the potential for future monitoring of any significant effects”. The mitigation and monitoring schedule (APP-196) presents full details of all mitigation and monitoring associated with all phases of the Mona Offshore Wind Project.</p> <p>The Applicant wishes to clarify that in light of its commitment to developing an Underwater Sound Management Strategy (UWSMS) (APP-202) that will reduce the underwater sound impacts on fish and shellfish ecology to an acceptable level</p>

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Reference	Relevant Representation Comment	Applicant's response
	(EN-3) 2.8.223). We welcome and encourage the commitment from the Applicant to consider this further, in order to inform the baseline of future projects and their alone and in-combination assessments.	(i.e. no significant residual effect), no future monitoring is considered to be required. As such, no current or future commitment to monitor fish and shellfish ecology is made within the application or deemed necessary to test the predictions made within the impact assessment.  A final version of the UWSMS will be agreed with NRW post-consent, as secured through the deemed marine licence of the draft DCO (see Schedule 14, Part 2; C1 Draft Development Consent Order F03).
RR-011.46	For example, for the Mona project alone, the Applicant proposes to manage underwater sound impacts from piling through the UWSMS. If Mona was the only project proposed in Liverpool Bay SAC, then this would be acceptable. However, the UWSMS places a reliance on other projects to adopt the same (or similar) approaches / mitigation techniques in order to address issues relating to cumulative and in-combination effects. Such approaches, of course, may not be adopted / proposed by other projects. We consider, therefore, that it would be highly beneficial for additional future monitoring to be carried out, particularly to address concerns surrounding cumulative effects, and we would encourage the Applicant to work with other project proposers on a joint monitoring strategy.	The values for other projects and plans included in CEA are highly precautionary, representing the maximum design scenarios for each of the projects included. The CEA is based on information for other projects and plans, including commitments to reduce effects due to underwater sound, that are in the public domain. Therefore, the Applicant can rely on those commitments as they are, or will be, secured through the consent for the other projects and plans. For future projects and plans, the Morgan Generation Assets Project has committed to developing a UWSMS, the Morecambe Generation Assets Project and the Morgan and Morecambe Transmission Assets Project have committed to standard piling practices to reduce impacts on fish and shellfish (e.g. soft starts and ramp ups) (Morecambe Offshore Windfarm Ltd, 2023, Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited, 2023). Therefore, the assumptions in the outline UWSMS (APP-202) that other projects will adopt mitigation techniques to reduce impacts from underwater sound to an acceptable level are valid.  No fish and shellfish ecology monitoring to test the predictions made within the impact assessment is considered necessary. Full details of all mitigation and monitoring associated with all phases of the Mona Offshore Wind Project are presented in the Mitigation and monitoring schedule (APP-196).
RR-011.47	<p><b>2.4 Physical Processes</b></p> <p>2.4.1 NRW (A) agrees that the baseline description of physical processes through the desktop review of existing literature and existing data sources, project specific surveys and numerical modelling baseline scenarios are sufficient to appropriately characterise the study area (Array Area as it relates to potential impacts in Welsh waters, Export Cable Corridor).</p>	The Applicant notes NRW's response.

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Reference	Relevant Representation Comment	Applicant's response
RR-011.48	2.4.2. We agree with the Numerical modelling approach and scenarios conducted in relation to hydrodynamics, waves and sediment transport to inform the potential changes on Constable Bank, Menai Strait and Conwy SAC and the adjacent coast arising from the construction, operation and decommissioning of Mona Offshore windfarm.	The Applicant notes NRW's response.
RR-011.49	2.4.3. We acknowledge the commitment of the Applicant to develop and adhere to an Offshore Construction Method Statement (CMS) including a cable specification and installation plan (CSIP) [APP-195, APP-196] which will detail the Applicant's commitments to minimise the potential impacts to Constable Bank (an Annex 1 habitat outside of an SAC); the habitats and species within the Menai Strait and Conwy Bay SAC, and; the intertidal area between Mean High Water Springs (MHWS) and Mean Low Water Springs (MLWS). We recommend that NRW (A) should be consulted in writing on the suitability of the offshore CMS ahead of commencement of activities.	NRW will be consulted in writing on the offshore CMS. Condition 18(1)(d), Part 2, Schedule 14 of the dDCO (C1 Draft Development Consent Order F03) requires the undertaker to submit an offshore CMS to NRW for approval in writing prior to commencement of the authorised scheme.
RR-011.50	2.4.4. We welcome the commitment that no cable protection will be installed within Constable Bank, that no cable protection higher than 70 cm will be installed within the Menai Strait and Conwy Bay SAC, and that no cable protection will be placed in the intertidal between MHWS and MLWS. These commitments were made during extensive pre-application discussion and are confirmed in the draft Marine Licence principles [APP-195] and physical process chapters [APP-053]. However, we note that paragraph 1.5.2.28 of APP-186 states that "...no cable protection is <b>anticipated</b> (our emphasis) on Constable Bank". We seek assurance that cable protection will not be installed on the bank. Should this position change, then NRW (A) would have significant concerns.	The Applicant confirms that no cable protection will be placed on Constable Bank. The use of the word 'anticipated' was an error. This commitment is secured through the offshore Construction Method Statement. Condition 18(1)(d), Part 2, Schedule 14 of the dDCO (C1 Draft Development Consent Order F03) requires the undertaker to submit an offshore CMS to NRW for approval in writing prior to commencement of the authorised scheme.
RR-011.51	2.4.5 In addition, we require clarification from the Applicant as to whether cable protection will be required on the Horizontal Directional Drilling (HDD) exit pits, as this is currently not clear within the submitted documentation. Should this be required, impacts to physical processes will	There is a commitment that no cable protection will be placed on the seabed in the intertidal zone with trenchless techniques being undertaken between MHWS and MLWS.

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	<p>require assessment. Consideration should be given to the potential obstruction to the bedload sediment transport pathways both alongshore and onshore/offshore, and the potential impact on wave diffraction and wave refocussing on the coast given that the exit pits will be located in shallow water just seaward of MLWS.</p>	<p>Up to four exit pits may be required for installation of export cables under the intertidal area via trenchless techniques, these exit pits will be seawards of MLWS. As with other remedial cable protection, cable protection at the exit pits would be avoided wherever possible. In the event that the export cable exit pits (seaward of MLWS) require cable protection in the form of mattressing or rock bags, the width and height of the cable protection at the exit pits would be subject to the same commitments as for the whole Mona Offshore Cable Corridor. Cable protection will be up to 10 m wide and is subject to the commitment that there will be no more than a 5% reduction in water depth (referenced to Chart Datum) at any point along the Mona Offshore Cable Corridor without prior written approval from NRW-MLT in consultation with the MCA (secured within the Draft DCO (C1 Draft Development Consent Order F03) under Schedule 14 (deemed Marine Licence). The commitment is secured through the offshore Construction Method Statement. Condition 18(1)(d), Part 2, Schedule 14 of the dDCO requires the undertaker to submit an offshore CMS to NRW for approval in writing prior to commencement of the authorised scheme.</p> <p>The potential requirement for cable protection at the exit pits (seaward of MLWS) is therefore included within the maximum design scenario assessed for cable protection requirements for the Mona Offshore Cable Corridor (i.e. cable protection for up to 20% of the 360 km of offshore export cables) and has been assessed within section 1.9 of Volume 2, Chapter 1: Physical processes (APP-053). The impacts on benthic ecology from cable protection are considered in section 2.9 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054).</p>
RR-011.52	<p>2.4.6 We acknowledge the use of HDD at landfall to minimise the environmental impact of trenching on conservation features in the intertidal area between MHWS and MLWS, and that no maintenance works will be undertaken in the intertidal zone during the operation and maintenance phases. We advise that 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 lifetime of the project due to short-term beach draw-down during storms or long-term beach erosion. We advise that that this information is gathered prior to determining the burial depth for the HDD cable landfall across the intertidal and is included in the</p>	<p>Geotechnical site investigations were undertaken in 2022 and 2023 to confirm the technical feasibility of and commitment made to the use of trenchless techniques under the intertidal area as set out in section 1.4 of the Outline Landfall Construction Method Statement (LCMS) (APP-226).</p> <p>Further detailed onshore and offshore geotechnical investigations will be conducted at the landfall, including establishing the depth of burial requirements to avoid the risk of exposure. Details of the final design will be included within the final LCMS submitted to the relevant planning authority following consultation with NRW as secured in Schedule 2, Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03).</p>

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Reference	Relevant Representation Comment	Applicant's response
	Landfall Construction Method Statement (LCMS) NRW (A) should be consulted in writing on the suitability of the LCMS ahead of commencement of activities.	
RR-011.53	2.4.7. We acknowledge the commitment of the Applicant to conduct a detailed Cable Burial Risk Assessment and Burial Assessment Study, to be included within the CSIP [e.g. APP-195 and APP-196] prior to cable laying and which will confirm the locations requiring cable protection along the cable corridor. We acknowledge the commitment that 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 Maritime Coastguard Agency (MCA). We request clarity as to whether this commitment means that the height of the cable protection above the seabed will be altered in relation to the given water depth at that point along the export cable corridor. Altering the height of the cable protection will ensure that the cable protection is sufficiently low profile to cause minimal changes to wave, tide and sediment transport.	The Applicant can confirm that the height of the cable protection above the seabed may be altered in relation to the given water depth at any point along the export cable corridor to ensure adherence to the commitment:- No more than a 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. This will ensure any cable protection is sufficiently low profile to cause minimal changes to wave, tide and sediment transport. This commitment is secured within the deemed Marine Licence (dML) in Schedule 14 of the draft DCO (C1 Draft Development Consent Order F03) and also suggested for inclusion in the standalone NRW Marine Licence (see the draft Marine Licence Principles Document (APP-195)).
RR-011.54	2.4.8. The MDS for sand wave clearance in Mona Offshore windfarm (OWF) Array and cable corridor amounts to 14,541,497m <sup>3</sup> and of that, 1,504,000m <sup>3</sup> of sediment displacement occurs in the offshore cable corridor. We acknowledge that in all cases, the material cleared from the sandwave will be sidecast allowing the sediment to be readily available for supply for sandwave recovery. We further acknowledge that sandwave reformation will depend on a range of factors including the size, location and alignment of any breach with respect to the sediment transport pathways and available recharge material. Whilst we recognise that monitoring is not essential, given the active sediment transport in the study area and the availability of recharge material, consideration should be given to sandwave recovery monitoring in the post installation surveys, particularly on Constable Bank. This would also assist in validating assumptions made in the ES, i.e. that sandwave reformation would occur within months,	No significant effects were predicted with the EIA, and therefore, no further monitoring is considered to be required to test the predictions of the EIA.

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Reference	Relevant Representation Comment	Applicant's response
	therefore we encourage the Applicant to actively consider monitoring.	
RR-011.55	<p>2.4.9. During pre-application engagement, JNCC liaised with NRW (A) on the Applicant's proposal to use marine sediment from the Mona Array area as ballast for the conical gravity base foundations. Both JNCC and NRW (A) requested further information from the Applicant regarding the impacts of potential sediment loss from the proposed operations, in the context of the wider environment, and, the sediment transport budget of the area - particularly as the impacts resulting from the loss of material would be further exacerbated as similar activities have been proposed for the Morgan OWF project. We also requested that the Applicant's ES cover the following:</p> <ul style="list-style-type: none"> <li>• a detailed methodology of proposed activities including detailed technical aspects;</li> <li>• justification for the proposed activities and comparison with alternatives, and;</li> <li>• impact assessments for both offshore benthic ecology and physical processes (all potential impact pathways should be considered, assessed, or scoped out with justification.</li> </ul> <p>2.4.10. In the ES [APP-053] the Applicant has responded by stating that in terms of sediment budget, 490,000m<sup>3</sup> of the maximum 6,746,105m<sup>3</sup> seabed preparation volume (which equates to 7.2%) may be removed across the Mona Array Area during the 12month installation period, which equates to an average sediment ballast requirement of 5,104m<sup>3</sup> per foundation location when 96 gravity base foundations are considered. Under tides alone, the typical net sediment transport through the array area is circa 20,000m<sup>3</sup> per day; the harvested material therefore represents a one-off 6.7% reduction in sediment budget during the construction phase and would therefore not significantly influence sediment transport across the Mona Array Area.</p>	The Applicant notes and welcomes NRW's response.



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Reference	Relevant Representation Comment	Applicant's response
	2.4.11. NRW (A) are satisfied that the sediment removal is not likely to indirectly have an impact on designated features within Welsh inshore waters.	
RR-011.56	<p><b>2.5. Benthic Subtidal and Intertidal Ecology</b></p> <p>2.5.1. NRW (A) agrees that the data collected through the site-specific surveys and through the desktop review of existing literature and data sources is sufficient to appropriately characterise the benthic ecology in the export cable corridor.</p>	The Applicant notes NRW's response.
RR-011.57	2.5.2. We agree with the conclusions of the ISAA [APP-032], that provided the mitigation measures outlined are adhered to, the project will not have an AEoSI and therefore will not undermine the conservation objectives of the benthic designated features of the Menai Strait and Conwy Bay SAC. Notwithstanding this, there are a number of minor issues that we consider should be amended in the ISAA. These minor issues do not change the assessment conclusions.	The Applicant notes NRW's response.
RR-011.58	2.5.3. We acknowledge and welcome the commitment of the Applicant to use trenchless techniques at landfall in order to avoid impacts to sensitive features i.e. Sabellaria alveolata and Peat and clay exposures on piddocks. However, it is currently unclear whether cable protection will be required on the HDD exit pits. We require clarification on this matter. Furthermore, should this be required, the Applicant will need to consider and assess the potential impacts on benthic ecology.	Please see row RR-011.51 above.
RR-011.59	2.5.4. We note that no maintenance works will be undertaken in the intertidal zone during the operation and maintenance phase and therefore no assessment regarding temporary habitat disturbance/loss of the intertidal Important Ecological Features (IEFs) has been carried out. We advise that the outputs of the physical processes study should be used to ensure the depth of cable installation across the intertidal is sufficient to minimise any future cable exposure.	Please see row RR-011.52 above.

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Reference	Relevant Representation Comment	Applicant's response
	Please also refer to paragraphs 2.4.6 above for further information.	
RR-011.60	2.5.5. NRW (A) agrees with the conclusion of the ES that the potential impact from sandwave clearance in Constable Bank (Annex I sandbank outside SAC) will be of minor significance, which is not significant in EIA terms. However, in line with comments at 2.4.8 above, consideration should be given to sandwave recovery monitoring during post-installation surveys in Constable Bank, in order to validate the assumptions made in the ES. Recovery monitoring of sandbanks will support statements made in the submitted documentation that sandbanks will recover in the short-term and will also help to inform future work. We recommend that this should be secured within the dML / standalone ML.	No significant effects were predicted with the EIA, and therefore, no further monitoring is considered to be required to test the predictions of the EIA.
RR-011.61	2.5.6. We acknowledge the commitment of the Applicant to produce a biosecurity risk assessment and Invasive Non-Native Species (INNS) Management Plan to be conditioned within the ML, as outlined in Marine Licence Principles Document [APP-195]. We recommend that the marine biosecurity plan is a free-standing document kept separate to the terrestrial plan provided in the Outline Biosecurity Protocol [APP-223]. We recommend that NRW (A) should be consulted on the suitability of a marine biosecurity risk assessment and plan ahead of commencement of activities. We advise that the Biosecurity Plan should be secured in both the dML and standalone ML.	<p>The measures to minimise the potential spread of invasive non-native species', which is secured under Schedule 14, Condition 18(1)(e)(vii) of the Draft DCO (C1 Draft Development Consent Order F03), is a free-standing annex to the offshore environmental management plan (EMP) and a separate plan to the Outline Biosecurity Protocol (APP-223), which is part of the Code of Construction Practice and secured under Schedule 2, Requirements 9.</p> <p>Some pre-commencement plans and documents listed under Schedule 14, Condition 18 require approval by NRW in consultation with the JNCC prior to commencement of construction of the authorised scheme.</p> <p>It is expected that a marine biosecurity plan will also be secured within the standalone marine licence, as set out in the marine licence principles document [APP-195].</p>
RR-011.62	2.5.7. We acknowledge the commitment of the Applicant to produce an Offshore Environmental Management Plan (EMP) and a Marine Pollution Contingency Plan (MPCP) to be conditioned within the ML, as outlined in Marine Licence Principles Document [APP-195]. NRW (A) should be consulted on the suitability of the EMP and MPCP plans ahead of commencement of activities. We advise that the EMP and MPCP should be secured in both the dML and standalone ML.	<p>The offshore EMP includes a Marine Pollution Contingency Plan (see Condition 18(1)(e)(i), Part 2, Schedule 14 of the dDCO (C1 Draft Development Consent Order F03)). Condition 18(1)(e)(i) requires that the Marine Pollution Contingency Plan is approved by NRW in consultation JNCC prior to commencement of construction of the authorised scheme.</p> <p>It is expected that the offshore EMP and MPCP will be secured within the standalone marine licence, as set out in the Marine licence principles document (J9 Marine Licence Principles Document F02).</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-011.63	<p><b>2.6. Marine Water and Sediment Quality (MW&amp;SQ)</b></p> <p>2.6.1. NRW (A) acknowledge the commitment of the Applicant to produce an Offshore EMP and a MPCP to be conditioned within the ML, as outlined in Marine Licence Principles Document [APP-195]. As noted in 2.5.7 above, we recommend that NRW (A) should be consulted on the suitability of the EMP and MPCP plans prior to of commencement of activities. We also advise that the EMP and MPCP should be secured in both the dML and standalone ML.</p>	Please see rows RR-011.23 and RR-011.62 above.
RR-011.64	<p>2.6.2. We welcome the inclusion of the additional sediment sampling undertaken by the Applicant. We support and agree with the precautionary approach undertaken to the initial assessment and note that no sediment contaminants exceed the CEFAS action level 2 threshold [APP-087], and that very few contaminants exceed the CEFAS action level 1 threshold as determined by additional sediment sampling in the area of disturbance.</p>	The Applicant notes your responses and welcomes your agreement with the precautionary approach taken to the assessment.
RR-011.65	<p>2.6.3. We acknowledge the commitment of the Applicant to use trenchless techniques at landfall to minimise sediment disturbance [APP-088]. On the basis that the cable burial techniques used in the intertidal zone will be trenchless, we have no concerns from a water quality perspective and are satisfied that no impact from the disturbance and / or remobilisation of sediment bound contaminants in the cable corridor will occur during construction, operation or decommissioning. We agree, therefore, with this being scoped out from further assessment, but please see comments above at 2.4.5 and 2.5.3 for Physical Processes and Benthic Ecology requesting clarity on cable protection at exit pits.</p>	The Applicant notes your responses and welcomes that NRW has no concerns about water quality and is satisfied that no impact from the disturbance and/or remobilisation of sediment-bound contaminants in the cable corridor will occur during construction, operation, or decommissioning. Please see rows RR-012.51 and RR-012.58 above for details on cable protection requirements at the exit pits.
RR-011.66	<p><b>2.7. WFD Coastal and Transitional Water Bodies: Offshore works</b></p> <p>2.7.1. NRW (A) supports the assessment conclusion in APP-088 that the proposed works will not cause deterioration to</p>	The Applicant notes NRW's response.

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Reference	Relevant Representation Comment	Applicant's response
	<p>the water quality of either of the water bodies considered (North Wales coastal waterbody and Clwyd transitional waterbody), nor the individual elements of these water bodies, or impact the objectives of achieving Good Ecological Potential (GEP) and Good Ecological Status (GES).</p>	
RR-011.67	<p><i>2.7.2. WFD Compliance Assessment screening and Zone of Influence (Zol)</i></p> <p>2.7.2.1. We suggest that clarification is provided on the justification for the screening decision not to include other waterbodies (e.g. Dee (North Wales), Conwy Bay and Anglesey North) in consideration of impacts, particularly given some of these additional waterbodies were assessed at HRA (ES Water Framework Directive Coastal Waters Assessment [APP-088] para 1.3.2.12 (pg 13)).</p>	<p>Three Transitional and Coastal (TraC) WFD water bodies were identified in Part 4, Annex B (Water Framework Directive Screening) of the Mona Offshore Wind Project EIA Scoping Report (Mona Offshore Wind Ltd., 2022). These were (north to south):</p> <ul style="list-style-type: none"> <li>• Mersey Mouth water body (GB641211630001)</li> <li>• North Wales water body (GB641011650000)</li> <li>• Clwyd water body (GB541006608000).</li> </ul> <p>Numerical modelling presented in Volume 6, Annex 1.1: Physical processes technical report [APP-086] indicated that impacts would not overlap spatially with any other TraC WFD water bodies and paragraph 1.3.2.12 of Water Framework Directive Coastal Waters Assessment (APP-088) summarises that, in light of the numerical modelling and low levels of disturbance, the 2 km Zol is considered sufficient. Therefore, other waterbodies beyond 2 km of the activity (e.g. Dee (North Wales), Conwy Bay and Anglesey North) would not be screened in.</p> <p>No specific additional TraC WFD water bodies were requested to be screened in as part of the NRW(A) Scoping Response (presented within Appendix 2 of the Mona Offshore Wind Project Scoping Opinion (APP-194)). Following this, no additional TraC WFD water bodies were requested for assessment as part of the NRW(A) Section 42 feedback presented in Consultation Report Appendices- Part 3 (D.25 - F) (APP-040).</p> <p>Finally, no WFD water bodies are assessed as part of the HRA process, as these are not a feature of any sites designated under the Habitats Regulations and would therefore be outside the focus and scope of HRA. European sites assessed in the HRA process, which overlap with named water bodies, are generally located beyond the 2 km Zol, and no pathway to impact is present. The only European sites that do overlap with the 2 km Zol (Liverpool Bay/Bae Lerpŵl SPA and Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC) have been included in section 1.5 (Impact Assessment) of the Water Framework Directive Coastal Waters Assessment (APP-088), under the 'Protected areas' heading.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-011.68	<p>2.7.2.2. Paragraph 1.3.2.6 in APP-088, acknowledges the advice previously provided by NRW (A) which advised the assessment of deterioration should extend further than 1nmi (modelling suggests 10km either side of the corridor). However, we note at 1.3.2.8 [APP-088] that this advice is subsequently discounted in asserting that the zone of influence (Zol) of the activities associated with the proposed works will be limited to 2 km (approximately 1.1nmi). We further note that section 6 of APP-194 (the Scoping opinion) states that: "...the waterbodies to be included in the assessment should be derived through numerical modelling and other assessment methods to determine the Zol". We continue to advise the Applicant should provide further details of the numerical modelling used and/or further details of the other assessment methods used to determine the Zol with respect to the risk of mobilisation of chemical contaminants and their impacts in assessing WFD compliance.</p>	<p>Paragraph 1.3.2.10 of Volume 6, Annex 2.2: Water Framework Directive Coastal Waters Assessment (APP-088) describes the numerical modelling in question as being that presented in Volume 6, Annex 1.1: Physical processes technical report (APP-068). This numerical modelling indicated a maximum potential sediment suspension plume envelope from sandwave clearance of approximately 10 km in either direction from the source. However, the seabed preparation activities from which sediment suspension and any associated remobilised chemical contaminants are expected to arise will occur in offshore waters at distances greater than 10 km from any WFD water body. Therefore, no effect pathway for WFD receptors from seabed preparation activities is predicted.</p> <p>Paragraph 1.3.2.11 of Volume 6, Annex 2.2: Water Framework Directive Coastal Waters Assessment (APP-088) then states that activities occurring within 1 nm of Mean High Water Springs (MHWS) (i.e. the distance stipulated by the '<i>Clearing the Waters for All</i>' guidance (Environment Agency, 2023)) including the installation of offshore export cables within the Mona Offshore Cable Corridor and Access Areas are expected to be substantially less disruptive to sediments than activities offshore. Furthermore, the shallower water here would further reduce the distance over which suspended sediment can travel. Therefore, a 2 km ZOI was considered appropriate for activities occurring within 1 nm of MHWS.</p> <p>Site-specific analysis of sediment-bound contaminants indicated no chemical contamination exceeding Cefas Action Level 1 and thus, there is considered to be no risk of any chemical contaminants impacting the WFD water bodies.</p>
RR-011.69	<p>2.7.2.3. We further advise that the justification given (in para. 1.3.2.8 [APP-088]) for the Zol considered in the WFD compliance assessment is inconsistent with the justification for the HRA screening decision not to take forward to consideration of LSE any features or impacts outside of the 12km precautionary buffer, and that referred to in the scoping section of this document (1.4.1.1 [APP-088]). We advise that this is corrected within the WFD compliance assessment.</p>	<p>The Applicant notes your response. It appears that the 12 km buffer referred to in paragraph 1.4.1.1 of Volume 6, Annex 2.2: Water Framework Directive Coastal Waters Assessment (APP-088) is a typographical error; it should be 2 km. The assessment used a distance of 2 km; therefore, the conclusions are unaffected by this discrepancy in the text.</p>
RR-011.70	<p>2.7.3. <i>Water Quality</i> 2.7.3.1. With the exception of 2.7.2.1 – 2.7.2.3 above, we agree that the assessment with respect to water quality is compliant with the requirements of the WFD.</p>	<p>The Applicant notes NRW's response.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-011.71	2.7.3.2. We welcome the inclusion and consideration of the results of the additional sediment sampling. We support the precautionary approach to the initial assessment.	The Applicant notes NRW's response.
RR-011.72	2.7.3.3. We note that the Applicant states that no sediment contaminants exceed the CEFAS action level 1 threshold - as determined by additional sediment sampling in the area of disturbance. We note that this statement is accurate only for samples taken within the assessed WFD waterbodies. We advise that as this statement is not consistent with the sediment contamination results presented in the Benthic Subtidal and Intertidal Ecology Technical Report [APP-087] (e.g. para. 1.7.3.27), and that additional clarity should be given to highlight that the data used in the WFD compliance assessment were relatively limited in their spatial applicability compared with the entire benthic subtidal and intertidal ecology study area.	<p>While the information contained within Volume 6, Annex 2.1 Benthic Subtidal and Intertidal Ecology Technical Report (APP-087) and corresponding ES chapter is used to inform part of the WFD Coastal Waters Assessment, the Benthic Subtidal and Intertidal Ecology study area forms the basis of the assessment for the Benthic Subtidal and Intertidal Ecology element of the EIA.</p> <p>The assessed WFD water bodies do not spatially correspond with the entirety of the Benthic Subtidal and Intertidal Ecology study area, and the conclusion that sampled sediment contaminants within the assessed WFD water bodies do not exceed the CEFAS action level 1 threshold remains accurate.</p> <p>As such, the conclusions drawn from the results of sediment sampling at locations within the Benthic Subtidal and Intertidal Ecology study area, which also lie <i>inside</i> the assessed WFD water bodies hold true, irrespective of the results of sediment sampling <i>outside</i> the assessed water bodies.</p>
RR-011.73	2.7.4. <i>Protected Areas</i> 2.7.4.1. We agree with the WFD compliance assessment conclusions [APP-088] that there is no pathogen source from the offshore works and so no potential to impact the WFD waterbodies and associated bathing waters sites.	The Applicant notes NRW's response.
RR-011.74	2.7.4.2. We support the conclusion by the Applicant of the requirement to consider the protected areas stated in the WFD Compliance Assessment.	The Applicant notes NRW's response.
RR-011.75	2.7.5. <i>Biology</i> 2.7.5.1. We support the conclusion that further assessment is required for the biological quality elements and supporting elements due to the proximity to sensitive habitat. It is currently unclear as to when and how these further assessments will be carried out. NRW (A) reserves its position until further detail is provided at which point we will provide further advice.	<p>Volume 6, Annex 2.2: Water Framework Directive Coastal Waters Assessment (APP-088) does not state that further assessment is required for biological quality elements and supporting elements due to the proximity to sensitive habitat.</p> <p>Full assessment of the Mona Offshore Wind Project for compliance with the WFD with respect to relevant high sensitivity WFD habitats and low sensitivity WFD habitats (as defined in the '<i>Clearing the Waters for All</i>' guidance (Environment Agency, 2023)) is presented in paragraphs 1.5.1.1 (page 27) to 1.5.1.12 (page 30) of Volume 6, Annex 2.2: Water Framework Directive Coastal Waters Assessment (APP-088).</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-011.76	<p>2.7.6. <i>Invasive Non-Native Species (INNS)</i>            2.7.6.1. We support the scoping consideration conclusion for the Clwyd transitional waterbody and the North Wales coastal water body that an INNS assessment of impacts is not required for WFD Assessment Compliance.</p>	<p>The Applicant notes NRW's response.</p>
RR-011.77	<p>2.8. Biodiversity Benefit and Green Infrastructure Statement            2.8.1 NRW (A) welcomes the Applicant's commitment to enhancing resilience of marine and coastal ecosystems in Wales as noted in APP-193 (Please note that the term "Net Gain" is only applicable in English terrestrial biodiversity benefit policy and is not relevant for Wales. The term used in Wales is Net Benefit for Biodiversity under terrestrial planning through Planning Policy Wales (PPW)). We also welcome the Applicant's positive engagement with the formalisation of the delivery of terrestrial net benefit for biodiversity in Wales as the Welsh Government develops its approach. We will continue to work with the Applicant on developing these proposals as more detail emerges throughout examination and post-consent, and we welcome the work that that the Applicant has done on this topic thus far. We also recommend that the Applicant reviews NRW's Guidance Note 59 <i>Principles supporting restoration and enhancement in marine or coastal development proposals</i>, which sets out NRW (A)'s approach on the inclusion of restoration or enhancement elements in a marine or coastal development proposal and encourages engagement with NRW (A).</p>	<p>This is noted by the Applicant and the Applicant will continue to engage with NRW on this matter.</p> <p>The Applicant notes the recommendation to review NRW Guidance Note 59 and will consider this when further developing the intertidal and offshore biodiversity benefit measures.</p>
RR-011.78	<p>2.8.2 We advise that there is a requirement through Wales's terrestrial planning system as captured in Planning Policy Wales (PPW) 12 a detailed in APP-193 (note that APP-193 incorrectly refers to PPW Edition 11 and which required amendment throughout the application) which requires Net Benefit for biodiversity. This is based on the concept that development should leave biodiversity and the resilience of ecosystems in a better state than before through securing long-term, measurable and demonstratable benefit, primarily on or immediately adjacent to the site. We note this this</p>	<p>The Biodiversity Benefit and Green Infrastructure Statement (APP-193) makes reference to the October 2023 update published by Welsh Government which included the update to Chapter 6 of PPW, which was subsequently adopted into PPW 12. Therefore, the requirement to secure net benefit for biodiversity and enhancement of, and improvement to ecosystem resilience has already been incorporated into the Applicant's proposals. The measures outlined in section 3 of the Biodiversity Benefit and Green Infrastructure Statement (APP-193) will ensure an overall net benefit for biodiversity is achieved.</p>

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	<p>applied down to Mean Low Water (MLW) so there is cross-over with the marine planning regime at the coast.</p>	<p>The Applicant has completed a review of PPW 12 and has submitted a note to address the changes within PPW 12 relevant to the Mona Offshore Wind Project (Document Reference S_PD_8).</p>
RR-011.79	<p>2.8.3 We also advise that the Marine planning – Welsh National Marine Plan (WNMP) includes policy ENV_01: <i>Resilient Marine Ecosystems</i> which aims to ensure that biological and geological components of ecosystems are maintained, restored where needed and enhanced where possible, to increase the resilience of marine ecosystems and the benefits they provide. It encourages consideration of the inclusion of restoration and enhancement in a development project at sea and at the coast but, as noted in APP-193, there is not currently obligation upon proposers of projects in the marine environment to do so.</p> <p>2.8.4 We have reviewed the proposed commitments in APP-193 and consider that these align with the WNMP Policy ENV-01 in relation to the resilience of marine ecosystems.</p>	<p>This is noted and welcomed by the Applicant.</p>
RR-011.80	<p>2.8.5 Paragraph 3.2.1.1 in APP-193 states that NRW (A) agreed to the qualitative approach taken by the Applicant during a meeting held in April 2023. Whilst we do not necessarily disagree with this approach, we note that the engagement on this topic, from both a terrestrial and marine perspective was limited. We do however acknowledge that no formal advice was requested by the Application or provided by NRW (A) during the pre-application phase. Nonetheless, we welcome the Applicant's commitment to this matter, and we will continue to work with the Applicant on this as more detail emerges throughout examination.</p>	<p>The Applicant will continue to engage with NRW on this matter and seek to reach formal agreement via the SoCG process.</p>
RR-011.81	<p>2.8.6 We note the Applicant's commitment to considering post-consent voluntary off-site opportunities to further improve biodiversity. We acknowledge the Applicant's intention to consider various biodiversity measures that may be secured in the dML and ML.</p>	<p>This is noted and welcomed by the Applicant.</p>
RR-011.82	<p>2.8.7 We welcome the inclusion of nature positive design elements (subtidal and intertidal) in the Applicant's proposals, beyond what may be required through the</p>	<p>The Applicant has applied a step-wise approach to developing the proposed biodiversity benefit measures presented in the Biodiversity Benefit and Green Infrastructure Statement (APP-193), as required by PPW 12. Table 1-1 of the</p>



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	<p>mitigation hierarchy, in order to deliver biodiversity benefit, and the commitment to explore wider opportunities to contribute to building resilience in the marine and coastal ecosystem – both within the footprint of the proposal and beyond. We consider it important, however, to emphasise the importance of keeping mitigation and enhancement elements separate from one another.</p> <p>2.8.8 We note the Applicant refers to providing biodiversity benefit measures in addition to ensuring sufficient mitigation is to be put in place, in order to reduce and/or eliminate potential for significant effects as part of the mitigation hierarchy (avoid, minimise, mitigate). We advise that mitigation measures should not be considered as methods for biodiversity improvement or enhancement, as they are in place as preventative measures of deterioration of features rather than providing biodiversity benefit from the baseline.</p>	<p>Biodiversity Benefit and Green Infrastructure Statement (APP-193) sets out how this has been applied and where further information on each step (i.e. avoid, minimise, mitigate/restore, compensate on site and compensate off site) can be found within the application documents.</p> <p>In the area surrounding the Onshore Substation, the Applicant has identified areas of land that can provide both mitigation and enhancement in order to maximise effectiveness and minimise land take. Details of the function of each parcel of land at the Onshore Substation in terms of providing mitigation and biodiversity enhancement can be found in Annex 3.11 to the Applicant's response to NRW's relevant representation (Document Reference S_PD_3.11).</p>
RR-011.83	<p>2.8.9 Reference is made in Section 2 of APP-193 to the North-East and North-West Wales Area Statements, however the Marine Area Statement is not considered within the document. In developing their proposals, we advise that the Applicant amends this to include consideration of the Marine Area Statement in addition to the terrestrial statements.</p>	<p>The Applicant notes the recommendation to include the Marine Area Statement and will consider this when further developing the intertidal and offshore biodiversity benefit measures.</p>
RR-011.84	<p><b>2.9. Decommissioning - Offshore</b></p> <p>2.9.1. We acknowledge the commitment to produce a Written Decommissioning Programme under section 105 of the Energy Act 2004 to be approved by the Secretary of State for the Department of Energy Security and Net Zero (DESNZ).</p>	<p>This comment is noted.</p>
RR-011.85	<p>2.9.2. We note, from the ES [APP-050], that it is anticipated that all structures above the seabed or ground level will be completely removed where feasible and practical, unless, closer to the time of decommissioning it is decided that removal would lead to a greater environmental impact than leaving some components in situ. However, elsewhere, [e.g. APP-186], it is stated that inter-array, interconnector and</p>	<p>The Applicant does not consider it necessary or appropriate to produce a decommissioning plan any earlier than what is required under the Energy Act 2004 and Requirement 20 of the dDCO (see Schedule 2 of the dDCO (C1 Draft Development Consent Order F03)). Both of these will allow for ample time to consider the information contained in the plan as it must be submitted for approval</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>offshore export cables will be removed, and that all structures above the seabed would be removed, with only scour protection remaining in situ. NRW (A) advise that offshore renewable projects should produce a decommissioning plan that retains all decommissioning options (maintain, full removal and partial removal); the options for which can be assessed and refined closer to the time of decommissioning itself in consultation with NRW (A). NRW (A) reserves its position until a draft plan is submitted at which point we will provide further advice.</p>	<p>prior to offshore works commencing. The Applicant can share this with NRW for information at the time.</p>
RR-011.86	<p>2.9.3. Should decommissioning not be included within the scope of both the dML and standalone ML, we advise that the Applicant will need to submit a Marine Licence application at the point of decommissioning to remove infrastructure. It is not currently clear whether decommissioning works are included in the scope of the licences (please also see comments from NRW MLT in Section 4).</p>	<p>It is the Applicant's intention to secure decommissioning activities through separate standalone marine licences at the relevant time. Please see the Marine Licence Principles Document (J9 Marine Licence Principles Document F02), row 'Licence validity'.</p>
RR-011.87	<p><b>2.10. Mitigation and Monitoring Schedule and the Marine Licence Principles</b></p> <p>2.10.1. There are a number of inconsistencies between the Mitigation and Monitoring Schedule [APP-196], Marine Licence Principles document [APP-195] and draft deemed Marine Licence [APP-023] that require clarification. For example, APP-196 states that condition 18 (1)(d) within the draft dML to produce an Offshore CMS should include a commitment to cable burial where possible. We note that this commitment has not been transposed to the dML within the draft DCO, or the Marine Licence Principles document. Such discrepancies potentially result in confusion as to the exact measures that are to be secured as part of the project mitigation and which licence (dML or standalone ML) it is applicable to. We request that clarification regarding such discrepancies and inconsistencies is provided and advise that both APP-196 and APP-195 are consistent and contain accurate reference to all proposed mitigation and plans as</p>	<p>Condition 18(1)(d), Part 2, Schedule 14 of the dDCO (C1 Draft Development Consent Order F03) requires the undertaker to submit an offshore CMS to NRW for approval in writing prior to commencement of the authorised scheme. This includes '<i>a detailed cable specification and installation plan for the authorised scheme</i>' (see Condition 18(1)(d)(i)(bb)) which will include commitments to cable burial where possible.</p>

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RR-011.88	<p>described in the application documents. We advise that the Applicant undertakes a thorough review of both documents.</p> <p><b>3. ONSHORE</b></p> <p><b>3.1. Designated Landscapes – KEY CONCERN</b></p> <p>NRW's (A) Relevant Representations on seascape, landscape, and visual matters are set out below. These relate to the development's potential impacts on the character and visual amenity of the Isle of Anglesey (IoA) National Landscape (NL), Eryri National Park (ENP), and the Clwydian Range and Dee Valley (CRDV) NL, and the statutory purpose of these designations to conserve and enhance their natural beauty.</p> <p>For the purposes of this representation, the aforementioned designations are referred to collectively as Statutory Designated Landscapes (SDLs) and ES Volume 2 Chapter 8: Seascape and Visual Resources [APP-060] and ES Volume 3, Chapter 6: Landscape and Visual Resources [APP-069], and the appendices which support these chapters, are referred to collectively as the Seascape, Landscape, and Visual Impact Assessment (SLVIA)</p>	<p>See the Applicants response to NRW relevant representation 3.1.1 in Annex 3.3 (Document Reference S_PD_3.3).</p>
RR-011.89	<p>3.1.1. <i>Effects of Proposed Development</i></p> <p>3.1.1.1. Since NRW (A) commented on the PEIR, the MDS for the proposed wind turbines has changed. For MDS Scenario 1 the maximum number of turbines has reduced from 107 to 96 but the maximum blade tip height is unchanged at 293m above Lowest Astronomical Tide (LAT). For MDS Scenario 2 the maximum blade tip height has increased from 324m to 364m above LAT but the maximum number of turbines is unchanged at 68 turbines. (Table 3.5 ES Document Reference: F1.3) [APP-050].</p>	<p>See the Applicants response to NRW relevant representation 3.1.1 in Annex 3.3 (Document Reference S_PD_3.3).</p>
RR-011.90	<p>3.1.1.2. The changes above do not address concerns raised in pre-application advice provided by NRW to the applicant regarding the impacts of the proposed turbines on the IoA NL and potential cumulative impacts on both the IoA NL and</p>	<p>See the Applicants response to NRW relevant representation 3.1.1 in Annex 3.3 (Document Reference S_PD_3.3).</p>

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	<p>ENP. Instead of reducing the maximum blade tip height of the turbines, the Applicant has increased it. We advise that without a reduction in the height of the turbines and/or a reduction in the array area (i.e. away from the coast) it is likely the proposed turbines will cause significant and adverse effects on the character and special qualities of the loA NL; adverse cumulative effects on the character and special qualities of the ENP which are potentially significant; and effects on both the loA NL and ENP that are not significant, but nevertheless adverse.</p>	
RR-011.91	<p>3.1.1.3. The proposed wind turbines individually and cumulatively with e.g., the consented Awel-y-Môr development, will result in visual changes to the settings of the loA NL and the ENP. These changes will harm characteristics and qualities of these landscapes - particularly those relating to perceptual and scenic aspects. We advise the SDLs exist for the purpose of conserving and enhancing their natural beauty. In the case of both the loA NL and the ENP, the proposals will harm aspects of these landscapes which contribute to their natural beauty.</p>	<p>See the Applicants response to NRW relevant representation 3.1.1 in Annex 3.3 (Document Reference S_PD_3.3).</p>
RR-011.92	<p>3.1.1.4. Effects on the views and visual amenity of visual receptors (people) at locations within both the loA NL and ENP would be significant and adverse, both as a result of the proposed development individually and cumulatively with the consented Awel y Môr development. This will include harm to views at locations which attract visitors seeking to experience the natural beauty and special qualities of these landscapes.</p>	<p>See the Applicants response to NRW relevant representation 3.1.1 in Annex 3.3 (Document Reference S_PD_3.3).</p>
RR-011.93	<p>3.1.1.5. People using the Wales Coast Path would experience both combined and sequential cumulative impacts as a result of the proposal and wind turbines within the consented Awel-y-Môr development. At locations such as Penmon Point, the cumulative effect would be greater than the effect of the Mona Array Area in isolation, and it is likely to be significant. We advise that as a result of both schemes in combination, people will have to travel ever</p>	<p>See the Applicants response to NRW relevant representation 3.1.1 in Annex 3.3 (Document Reference S_PD_3.3).</p>

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	further west along the north coast of Wales to be afforded coastal views unaffected by wind turbine development.	
RR-011.94	3.1.1.6. People walking the Offa's Dyke Path National Trail where it crosses the CRDV NL are expected to experience combined and sequential visibility of the Tier 1 onshore and offshore projects (including Awel y Mor substation) and experience potentially significant adverse visual effects. However, mitigation measures are expected to reduce the impact on receptors within the CRDV NL. These measures – which NRW (A) welcome – include proposals for new woodland planting around the proposed substation, as illustrated on the Illustrative Landscape and Ecology Strategy Plan within the Outline Landscape and Ecology Plan (LEMP) [APP-208] together with the intention for substation buildings to be finished in recessive colours as set out in the Design Principles (Document Reference J3) [App-189].	See the Applicants response to NRW relevant representation 3.1.1 in Annex 3.3 (Document Reference S_PD_3.3).
RR-011.95	3.1.1.7. Overarching National Policy Statement for Energy (NPS EN-1) 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.	See the Applicants response to NRW relevant representation 3.1.1 in Annex 3.3 (Document Reference S_PD_3.3).
RR-011.96	3.1.1.8. We advise the proposal would not accord with Policy SOC06 – Designated Landscapes - of the Welsh National Marine Plan 2019 (WNMP) because it does not avoid adverse impacts on designated landscapes; has not satisfactorily minimised impacts which cannot be avoided; and has not satisfactorily mitigated impacts which have neither been avoided nor minimised. Therefore, we advise that mitigation measures should be explored in the first instance. Enhancement measures should not be proposed unless and until mitigation measures have been fully exhausted.	See the Applicants response to NRW relevant representation 3.1.1 in Annex 3.3 (Document Reference S_PD_3.3).

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RR-011.97	3.1.1.9 Opportunities to enhance designated landscapes are encouraged by the WNMP but no proposals for enhancement have been included by the applicant in the draft DCO. NRW (A) considers enhancements represent compensation and/or offsetting and not mitigation for adverse effects, as any enhancements would not be directly related to the impacts.	See the Applicants response to NRW relevant representation 3.1.1 in Annex 3.3 (Document Reference S_PD_3.3).
RR-011.98	3.1.2. <i>Issues with SLVIA</i> 3.1.2.1. NRW (A) are concerned that the SLVIA has not assessed the worst-case scenario because it is based on MDS Scenario 2 (i.e. 68 x 364m tall turbines). Assuming it is technically feasible, we advise the worst-case assessment scenario for SLVIA purposes is a combination of the maximum number of turbines from MDS Scenario 1 and the maximum turbine height from MDS Scenario 2 (i.e. 96 x 364m tall turbines). If approved, these parameters will be listed on the DCO (Document Reference C1) [APP-023]. It is not clear why this combined scenario did not form the basis for the SLVIA and visualisations.	See the Applicants response to NRW relevant representation 3.1.2 in Annex 3.4 (Document Reference S_PD_3.4).
RR-011.99	3.1.2.2. We advise the Applicant's comment that no consultee objected to the approach to using MDS Scenario 2 for SLVIA (Table 8.17 Document Reference F2.8) [APP-060] is incorrect. We raised concerns with this approach in advising on the PEIR).	See the Applicants response to NRW relevant representation 3.1.2 in Annex 3.4 (Document Reference S_PD_3.4).
RR-011.100	3.1.2.3. We disagree with conclusions in the SLVIA regarding the effects of the proposed turbines on the IoA NL, ENP, and visual receptors within the SDLs. We advise the SLVIA has underreported and underestimated effects on SDLs. We advise conclusions regarding the effects on SDLs reported in the SLVIA are undermined by a number of fundamental issues. These include the omission of relevant receptors from the assessment, flaws within the SLVIA methodology, and flawed judgements. We advise that because the SLVIA has underestimated the effects of the proposed wind turbines, no specific mitigation measures have been considered.	See the Applicants response to NRW relevant representation 3.1.2 in Annex 3.4 (Document Reference S_PD_3.4).

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RR-011.101	3.1.2.4. We are concerned that local landscape and seascape character areas have been excluded from the SLVIA. Whilst studies such as the Anglesey Landscape Strategy 2011 and Anglesey Seascape Character Assessment, 2013, are referenced in the SLVIA, they are not receptors and it is not clear how – if at all - the review of these documents has informed an understanding of the character of the SDLs, their special qualities, and the impacts on these.	See the Applicants response to NRW relevant representation 3.1.2 in Annex 3.4 (Document Reference S_PD_3.4).
RR-011.102	3.1.2.5. We advise there are methodological and presentational issues with the visualisations and figures intended to support the SLVIA. We advise these issues should be addressed. Issues include: visualisations not presented in accordance with best practice guidance; photography taken in unsuitable conditions; heavily pixilated baseline photography; and, information being illegible due to the presentation of figures/maps as insets within the ES report. We require that the applicant provides a full hard copy of all SLVIA figures and visualisations relevant to SDLs printed at the correct paper size.	See the Applicants response to NRW relevant representation 3.1.2 in Annex 3.4 (Document Reference S_PD_3.4).
RR-011.103	3.1.2.6. We advise that the additional information requested in our PEIR response to understand the impacts of the proposal has not been provided. For example, we requested a cumulative Zone of Theoretical Visibility (ZTV) analysis for the Wales Coast Path be included in the ES, to highlight the route of the Path and be supported by more detailed 'sectional' cumulative and non-cumulative analysis. This has not been provided.	See the Applicants response to NRW relevant representation 3.1.2 in Annex 3.4 (Document Reference S_PD_3.4).
RR-011.104	3.1.2.7. We advise that cumulative wireline visualisations – depicting the proposed turbines in combination with schemes scoped into the cumulative SLVIA - have only been prepared from a select number of viewpoints (5 in total across all three SDLs). This means at other viewpoints, where the nature of the view and impact would be different, no visualisation is provided. Given the nature of the proposal, the sensitivity of the receptors being assessed, and the conclusions of the SLVIA with regard to these	See the Applicants response to NRW relevant representation 3.1.2 in Annex 3.4 (Document Reference S_PD_3.4).

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	receptors, we advise cumulative visualisations should be provided from all relevant viewpoints within the SDLs. We also consider cumulative visualisations showing the proposed substation and other Tier 1 developments (including the Awel y Môr substation) should be provided.	
RR-011.105	<p><b>3.2 Water Framework Directive (WFD) Compliance Assessment: Onshore works</b></p> <p>3.2.1. <i>Water Quality</i></p> <p>3.2.1.1. We agree with the WFD compliance assessment conclusion [APP-120] that there is no pathogen source from the onshore works and so no potential to impact the Clwyd transitional waterbody and associated bathing waters sites.</p>	This is noted and welcomed by the Applicant.
RR-011.106	3.2.1.2. We agree with the WFD compliance assessment conclusion that the proposed onshore works are unlikely to create or present significant sources of nutrients that would negatively impact the moderate phytoplankton status of the North Wales coastal waterbody or the good status of the Clwyd Transitional waterbody.	This is noted and welcomed by the Applicant.
RR-011.107	<p>3.2.2. <i>Fish</i></p> <p>We agree with the WFD compliance assessment conclusion [APP-120] that the proposed onshore works are unlikely to pose a potential risk to the fish quality element status of the Clwyd transitional waterbody and so do not require detailed assessment.</p>	This is noted and welcomed by the Applicant.
RR-011.108	<p>3.2.3. <i>Protected Areas</i></p> <p>We support the Applicant's approach to consideration of bathing waters protected areas (Environment Statement – Water Framework Directive surface water and groundwater assessment, Vol 7 Annex 2.4 para 1.9.4.6 pg. 70 [APP-120]). We advise that the Applicant takes note of the susceptibility of the Pensarn, the Kinmel Bay, the Rhyl and Rhyl East bathing waters sites to failure during heavy rainfall events when sewage, agricultural and sanitary pollutants may be washed into the sea. We welcome the commitment in the Outline Code of Construction Practice (CoCP) [APP-</p>	<p>The Applicant welcomes your support to the approach followed in the Water Framework Directive Surface Water and Groundwater Assessment (APP-120). The Applicant notes that Kinmel Bay, the Rhyl and Rhyl East bathing water sites are susceptible to failure during heavy rainfall events. The Water Framework Directive surface water and ground water assessment (APP-120) considers the potential impacts from construction of the Mona Offshore Wind Project on WFD protected areas within 2km of the Mona Onshore Development Area. The assessment includes the bathing water quality profiles at Abergele (Pensarn) and the Marine Lake at Rhyl.</p> <p>Investigations will be undertaken to characterise ground conditions as part of the onshore site preparation works (as defined in the draft Development Consent Order (C1 Draft Development Consent Order F03)). These investigations will note</p>



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	212] to pre-construction site investigation surveys and protective measures to reduce the risk of exacerbating this.	the location of septic tanks and their percolation area. Measures to mitigate surface water run off and groundwater drainage are set out in the Outline Construction Surface Water Drainage Plan (APP-218) which forms part of the Code of Construction Practice (CoCP). The CoCP is secured by Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03). A final version of the Construction Surface Water Drainage Plan will be implemented as approved by the relevant local planning authority.
RR-011.109	3.2.4. <i>Biology, INNS</i> We support the conclusions of the WFD compliance assessment [APP-120] that there will be no potential risk to the biological habitats, biological species or INNS receptors from the onshore portion of the proposed works to the WFD transitional and coastal waterbodies considered.	This is noted and welcomed by the Applicant.
RR-011.110	3.2.5. <i>Mitigation measures assessment</i> We advise that the mitigation measures assessment element for North Wales coastal water body (table 1.15 [APP-120]) should be moderate status, rather than the good status reported in 2021 classification. This is because the mitigation measures should be "not in place - not yet identified" instead of "Not applicable - not required in this water body" (Water Watch Wales 2021 Cycle 3 Classification Data - Erratum tab).	The mitigation measures assessment element for the North Wales coastal water body is reported as 'moderate status' in the Mona Errata Document (Document Reference S_PD_1).
RR-011.111	3.2.6. <i>In combination effects and cumulative effects</i> We advise a summary within the WFD compliance assessment would be beneficial as noted in our comments to the PEIR (1 June 2023 Our Ref: AOS-21167-0026), we note the signposting to F3.2 Environmental Statement Hydrology and Flood Risk [APP-065]. However, we advise that the WFD compliance assessment should consider the cumulative effects from other projects.	Volume 7, Annex 2.4: Water Framework Directive Assessment surface water and groundwater assessment (APP-120) includes a summary of the assessment conclusions. A separate cumulative impact assessment has not been undertaken within Volume 7, Annex 2.4: Water Framework Directive Assessment surface water and groundwater assessment (APP-120) to avoid repeating information provided in other chapters of the Environmental Statement. The Applicant notes your response and includes a summary of the cumulative effects from Volume 3, Chapter 1: Geology, Hydrogeology and Ground Conditions (APP-064), Chapter 2: Hydrology and Flood Risk (APP-065) and Chapter 3: Onshore Ecology (APP-066) in Annex 3.5 of the Applicant's Responses to Relevant Representations (Document Reference S_PD_3.5).
RR-011.112	<b>3.2.7. Fluvial geomorphology elements of the WFD - KEY CONCERN</b> 3.2.7.1. <i>General Comments</i>	The Mona Onshore Cable Corridor does not traverse any Main Rivers, however there are several ordinary watercourses that will be crossed. These watercourses are identified in Volume 3, Chapter 2: Hydrology and Flood Risk (APP-065). The

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	<p>With the exception of being mentioned in the WFD assessment [APP-120] and partial related reference to impacts on habitats in the Onshore Ecology chapter [APP-066] section, the ES fails to specifically address fluvial geomorphology (the physical form and natural processes of rivers). Unlike other similar subjects (e.g. hydrology, flood risk, ecology, fisheries etc) there is no baseline fluvial geomorphology data (e.g. River Habitat Survey, MoRPh, Fluvial Audit), no impacts identified, no consideration of sensitivity of receptors, no significance of effect or cumulative impact of any of the proposed works with regard to fluvial geomorphology (e.g. open cut or trenchless crossings of watercourses, haul road bridges etc.). As stated in our previous response to the PEIR dated (1 June 2023 AOS-21167-0026) "More details of the geomorphological impacts associated with the proposals should be provided and suitable expertise sought." This position remains valid.</p>	<p>Mona Offshore Wind Project has sought to avoid geomorphological impacts by committing at an early stage of the application to installing the onshore export cable at these watercourse crossings using trenchless techniques where possible. This is demonstrated in Volume 5, Annex 5.3: Onshore Crossing Schedule (APP-083) which shows that all but two watercourses along the Onshore Cable Corridor will be crossed using trenchless techniques. As detailed in Table 1.18 of Volume 7, Annex 2.4: Water Framework Directive Surface Water and Groundwater Assessment (APP-120) the two watercourses that could potentially be crossed using trenched construction methodologies have been assessed as low sensitivity and heavily modified.</p> <p>In addition to the installation of the onshore export cable, temporary watercourse crossings will be required for the haul road within the Onshore Cable Corridor; these crossings may comprise temporary culverts.</p> <p>Potential impacts on watercourses as a result of the installation of the onshore export cable (in the two locations where trenched construction methods may be used) and the temporary haul road crossings have been assessed. The assessments have considered impacts on hydromorphology (Volume 7, Annex 2.4: Water Framework Directive Surface Water and Groundwater Assessment (APP-120)) and impacts on flood risk at watercourse crossings (Volume 3, Chapter 2: Hydrology and Flood Risk (APP-065)).</p> <p>The Applicant considers that its assessment of the impacts to watercourses is proportionate given the nature of the hydrological receptors that will be crossed by the Mona Onshore Cable Corridor and the embedded design commitments. Baseline surveys were undertaken for the Environmental Statement to general characterisation of the watercourses. Further surveys will be undertaken post consent to provide geomorphological information for the design of the watercourse crossing method statements (where trenching has not been discounted) and for the haul road crossings. A commitment to undertake these surveys will be included in an update of the Outline Onshore Construction Method Statement (APP-227) which will be submitted to the Examination. The Outline Onshore Construction Method Statement forms part of the Code of Construction Practice (CoCP). The CoCP is secured by Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03). Through this the design of the watercourse crossing method statement and haul road crossings will be agreed with the relevant planning authority (in consultation with NRW) prior to construction.</p>
RR-011.113	3.2.7.2. <i>Environmental Statement Volume 5, Annex 5.3: Onshore Crossing Schedule [APP-083]</i>	The Applicant considers that the potential impacts of watercourse crossings using trenched and trenchless techniques have been appropriately assessed in Volume

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	<p>From the onshore crossing schedule there appears to be 9 watercourse crossings proposed. Seven of these crossings are proposed as trenchless (NRW's preferred method of crossing, dependant on launch and receiving pit locations and depth below the watercourse) and two marked as to be crossed via trenching or trenchless (S3N/S-WX-1 and S9-WX-1). Additional detail should be provided for each crossing location (and haul road bridges) but greater depth of assessment will likely be required for the crossings proposed using trenched techniques.</p>	<p>3, Chapter 2: Hydrology and Flood Risk (APP-065), Volume 7, Annex 2.4: Water Framework Directive Surface Water and Groundwater Assessment (APP-120) and Volume 3, Chapter 1: Geology, Hydrogeology and Ground Conditions (APP-064).</p> <p>The design of each watercourse crossing location will be described in the detailed watercourse crossing method statements. The method statements will be prepared post consent; they will be in general accordance with the principles set out in the Outline Onshore Construction Method Statement (APP-0227) and will be agreed with the relevant planning authority prior to construction. Site-specific information (e.g. site investigations) and further surveys (e.g. to provide geomorphological information) will be obtained to inform the detailed design of the watercourse crossing (e.g. underlying geology, depth of the watercourse), noting that the detailed design will reflect the complexity of the crossing method and location. The detailed design will identify the launch and receiving pit locations, depth of crossings and a standoff between the bed of the watercourse and the trenchless technique.</p>
RR-011.114	<p><i>3.2.7.3. Environmental Statement Volume 7, Annex 2.4: Water Framework Directive surface water and groundwater assessment [APP-120]</i></p> <p>"A note of the condition of each channel has been made" – however, no details of how this was assessed, or the record of the condition has been provided.</p>	<p>Environmental Statement Volume 7, Annex 2.4: Water Framework Directive Surface Water and Groundwater Assessment (APP-120) refers to the Baseline information on the habitats and hydromorphology along the watercourses that were made during field surveys undertaken by the onshore ecology team. These are recorded in Volume 7, Annex 3.2: Extended Phase 1 habitat survey technical report (APP-122), Volume 7, Annex 3.15: Fish and eel survey technical report (APP-138), and Volume 7, Annex 2.4: Water Framework surface water and ground water assessment (APP-120).</p>
RR-011.115	<p>Open cut trenching techniques can cause long term or irreparable impacts, not just short to medium term impacts stated in Table 1.13.</p> <p>No consideration is given to the long-term impacts on the rivers physical form and natural sediment processes given that the proposals fail to detail decommissioning of the scheme at the end of its life (Table 1.13), leaving equipment in-situ in perpetuity potentially within zones of influence of rivers. Rivers are naturally mobile features of the landscape and as such the risk of erosion, scouring or re-exposure of cables etc is likely over the coming generations.</p>	<p>The Applicant considers that the impact assessments presented in Volume 3, Chapter 2: Hydrology and Flood Risk (APP-065) and Volume 7; Annex 2.4: Water Framework Directive Surface Water and Groundwater Assessment (APP-120) have appropriately considered the potential impacts on watercourses.</p> <p>The Onshore Cable Corridor does not traverse any Main Rivers; there are several ordinary watercourses that will be crossed, including ephemeral streams and ditches. There are two locations (S3N/S-WX-1 and S9-WX-1) where trenched methods may be used (see Volume 5, Annex 5.3: Onshore Crossing Schedule (Document Reference APP-083))</p> <p>The design of watercourse crossings will be described in detailed watercourse crossing method statements that will be agreed with the relevant planning authority prior to construction. The design of the watercourse crossing method will take into</p>

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		<p>account long term impacts and decommissioning of the Mona Offshore Wind Project.</p> <p>In particular the depth of cover to the cable under the watercourses traversed will be designed to ensure that there will be no potential for exposure over the long term.</p> <p>During decommissioning, it is expected that the onshore export cables will be left in situ to minimise environmental disturbance (Table 1.13 in Volume 7, Annex 2.4: Water Framework Directive Surface Water and Groundwater Assessment (APP-120)). The methods of decommissioning will be described in the decommissioning plan, which is secured as a Requirement of the draft DCO (C1 Draft Development Consent Order F03) and will be agreed with the relevant planning authority.</p>
RR-011.116	<p><b>3.3. Air Quality – KEY CONCERN</b>  <i>F3.10 Environmental Statement - Air Quality [APP-073]</i>            NRW (A) notes that a traffic assessment has been conducted (section 10.8.3), however, it is also noted that only human health receptors have been included and not those for ecology (along with the relevant thresholds and assessment criteria for ecological impacts). There is no proposal/justification included to scope traffic out for construction and decommissioning as is for operational and maintenance phases. There are ecological receptors within 200m of plant construction activities and track out (within 20m according to dust assessment section 10.8.2). The NO<sub>x</sub> (NO<sub>2</sub>) emissions should be assessed against ecological receptors and we advise that an assessment is undertaken. Alternatively, should the number of vehicle movements screen out on the Annual Average Daily Traffic Heavy Duty Vehicle threshold then justification should be provided to this effect.</p>	<p>The assessment in Volume 3, Chapter 10: Air Quality (APP-073) includes all relevant ecological receptors within the air quality study area, which are highlighted in Figure 10.2.</p> <p>Paragraph 5.3.6 of the Institute of Air Quality Management <i>A guide to the assessment of air quality impacts on designated nature conservation sites</i> states that “<i>The Design Manual for Roads and Bridges (DMRB) describes the approach for the assessment of the impact of emissions from schemes on the strategic road network. A quantitative air quality assessment is required if European Sites are within 200 m of affected roads. Within this context, the distance of the affected road from the designated site is an important consideration. Air pollution levels fall sharply within the first few tens of metres from a road before reducing more slowly with distance. The air quality impact of a given change in traffic on a designated site where the relevant habitat/species is 100 m from a road will be very different to one that abuts the road</i>”.</p> <p>Paragraph 5.3.11 states: “<i>The DMRB provides a series of traffic screening criteria. These include the change in AADT flows on a given road of 1000 vehicles or 200 heavy duty vehicles (HDVs).</i>”</p> <p>There are no road links where the change in AADT exceeds 1000 vehicles. There are seven road links (the A55 between junction 23 and 27a) where the number of HDVs could increase by up to 205 HDVs however there are no European sites within 200 m of these road links. All other road links have an increase of less than 200 HDVs.</p> <p>The Air Quality assessment concludes that the NO<sub>2</sub> emissions from construction traffic are negligible at all receptors (paragraph 10.8.3 Volume 3, Chapter 10: Air Quality (APP-073)). There will be no change in the annual mean NO<sub>2</sub></p>

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		<p>concentrations at any of the receptors as a result of the Mona Offshore Wind Project, when compared to the annual mean NO<sub>2</sub> concentrations without the Project; and given that all of the ecological receptors are further from the A55 than the modelled receptors, it can be concluded that there would be no effects on the sections of ancient woodland nearest to the A55.</p>
RR-011.117	<p>3.3.2. We are satisfied with the assessment of dust impacts (section 10.8.2) and proposed mitigation measures within the Outline Dust Management Plan [APP-214] to form part of the Code of Construction Practice (CoCP) [APP-212]. We also note that the final CoCP (Requirement 9 of the DCO) will be approved by the Local Planning Authority (LPA) following consultation with NRW. We agree with this approach.</p>	<p>This is noted and welcomed by the Applicant.</p>
RR-011.118	<p>3.3.3. We note that the works will be within the proximity of Ancient Woodland. Planning Policy Wales recognises the significant value of ancient woodlands and makes provision for their protection against damage or loss. Our standing advice to all planning proposals that may affect (directly or indirectly) ancient woodland can be found on the NRW website under "Advice to planning authorities considering proposals affecting ancient woodland". The LPA will be able to advise with respect to the acceptability of the proposals in terms of Ancient Woodland.</p>	<p>The assessment of impacts to ancient woodland and the proposed mitigation measures are in accordance with the NRW guidance "Advice to planning authorities considering proposals affecting ancient woodland" (see Volume 3, Chapter 3: Onshore ecology (APP-066)).</p> <p>Four areas of ancient woodland (Llanddulas Limestone and Gwrych Castle Wood SSSI, Coed Nant Meifod, Coed Carreg-Dayydd, Coed y Ddol) and a small number of veteran trees have been identified within and directly adjacent to the Mona Onshore Development Area (Volume 7, Annex 3.1: Onshore ecology desk study and technical report (APP-121)). Tree surveys have been undertaken in accordance with the requirements set out in BS Publication (2012) 5837: 'Trees in relation to design, demolition and construction – recommendations' and the results are reported in Volume 7, Annex 6.6: Tree survey and arboricultural impact assessment (APP-160 to APP-167)).</p> <p>Direct impacts on ancient woodland will be avoided with the use of trenchless techniques for the installation of the Onshore Cable Corridor and the routing of the Onshore Substation access road. Indirect impacts from construction activities will be mitigated using measures set out in the Outline Arboriculture Method Statement (APP-230) and Outline Dust Management Plan (APP-214), which form part of the Code of Construction Practice (CoCP). The CoCP is secured by Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03). Final versions of the Arboriculture Method Statement and Dust Management Plan will be implemented as approved by the relevant local planning authority.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-011.119	<p><b>3.4. Ecology (Terrestrial) – KEY CONCERN</b>  <b>3.4.1. Ornithology – KEY CONCERN</b>            3.4.1.1. NRW (A) note that Table 1.5 (page 12, Volume 7, Annex 4.3: Onshore ornithology – breeding birds technical report (Confidential)) [APP-142] identifies Barn Owl as a potential breeding species within the onshore corridor. However, no surveys have been provided to assess the use of the onshore corridor for breeding and/or foraging barn owls. As barn owl are listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) we advise that an assessment for this species is undertaken.</p>	<p>Data from North Wales Local Environmental Records Centre (as reported in Volume 7, Annex 4.1: Onshore ornithology – wintering and migratory birds technical report (APP-139)) indicated that one barn owl sighting was recorded within the 2km of the Mona Onshore Development Area.</p> <p>A total of nine breeding bird surveys were undertaken during the 2022 and 2023 breeding bird seasons across the onshore ornithology study area. Surveys used a simple territory mapping method, whereby birds were detected and located along a survey route. No breeding barn owls were recorded during the survey and no evidence of breeding barn owl was noted in tree cavities during the tree surveys undertaken for bats (Volume 7, Annex 3.9: Bat roost survey technical report (APP-129 to APP-131)). Furthermore, onshore wintering and migratory bird surveys were undertaken; two survey visits were made between February 2022 and March 2023 following the “look-see” methodology (Bibby et al., 2000). Only one barn owl was recorded at the landfall site during the wintering and migratory period (see Volume 7, Annex 4.1: Onshore Ornithology – Wintering and Migratory Birds Technical Report (APP-139)).</p> <p>On the basis that no barn owls were recorded during the surveys, , an assessment for impacts on barn owl was not undertaken in Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-067) as it was not considered that there would be any impact on barn owls arising from construction and operation of the onshore elements on the Mona Offshore Wind Project. Pre-construction surveys will be undertaken where vegetation removal is proposed during the breeding bird season (as set out in the Bird Protection Plan of the Outline Landscape and Ecology Management Plan (APP-208), which is secured as a Requirement of the draft DCO (C1 Draft Development Consent Order F03). If barn owl is recorded during the pre-construction surveys, mitigation measures from the Breeding Bird Plan will be implemented.</p>
RR-011.120	<p><b>3.4.2. Protected Species</b>            3.4.2.1. We consider the survey and assessment to be satisfactory in respect of great crested newts (GCNs), bats, otters, dormice, water voles. Water voles are protected under the Wildlife and Countryside Act 1981 (as amended). GCNs, bats, otters and dormice are also European Protected Species (EPS) which are protected under the Conservation of Habitats and Species Regulations 2017 (as amended).</p>	<p>This is noted and welcomed by the Applicant.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-011.121	<p>3.4.2.2. We agree with the conclusions in the ES Onshore Ecology (ref F3.3) [APP-066] and the recommendations and proposed principles for mitigation in the Outline Landscape and Ecology Management Plan (LEMP) [APP-208]. We also note that the final LEMP (Requirement 12 of the DCO) will be approved by the LPA following consultation with NRW. We agree with this approach. However, we consider that amendments to the Outline LEMP are required to ensure that the final LEMP is based on a more robust Outline LEMP (e.g. the need for an external Ecological Compliance Audit, revised details regarding long-term monitoring and management).</p>	<p>The Applicant welcomes NRW's agreement with the conclusions of the onshore ecology assessment (reported in Volume 3, Chapter 3: Onshore Ecology (APP-066) and the principles for mitigation set out in the Outline Landscape and Ecology Management Plan (APP-208).</p> <p>The Applicant notes the comment regarding amendments to the Outline LEMP (APP-208) and considers that the detail in the Outline LEMP is suitable for the stage of the Mona Offshore Wind Project.</p> <p>The final LEMP(s) will be prepared during the detailed design stage and will include monitoring programmes that will be tailored to the detailed mitigation measures. As per the draft DCO (C1 Draft Development Consent Order F03) Requirement the final LEMP(s) will be agreed with the relevant planning authority in consultation with NRW prior to commencing the relevant stage of the onshore and intertidal works.</p>
RR-011.122	<p>3.4.3. <i>Fish (Freshwater)</i>            3.4.3.1. We agree with the conclusions in the ES Onshore Ecology (ref F3.3) [APP-066] and the recommendations and proposed principles for mitigation for fish (eels) in the Outline LEMP (LEMP) [APP-208]. We also note that the final LEMP (Requirement 12 of the DCO) will be approved by the LPA following consultation with NRW. We agree with this approach.</p>	<p>This is noted and welcomed by the Applicant.</p>
RR-011.123	<p>3.4.4. <i>Designated Sites</i>            3.4.4.1. We note the design of the cable corridor is for an avoidance of impact to sensitive ecological receptors and when this is not possible there is a commitment to trenchless techniques under Traeth Pensarn Site of Special Scientific Interest (SSSI) and Llanddulas Limestone and Gwrych Castle Wood SSSI as stated in Table 3.22 of the Onshore Ecology report [APP-066]. Micro-siting of the route will be detailed in the Outline Landfall Construction Method Statement [APP-226] and Outline Construction Method Statement [APP-227] as they are progressed as part of the of the overarching Outline Code of Construction Practice (Requirement 9 of the DCO). We also note the commitments in Outline LEMP [APP-208] as part of the final LEMP</p>	<p>This is noted and welcomed by the Applicant.</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>(Requirement 12 of the DCO). Both Requirements 9 and 12 will be approved by the LPA following consultation with NRW. We agree with this approach.</p>	
RR-011.124	<p><b>3.4.5. Invasive Non-Native Species (INNS) (Terrestrial)</b>            3.4.5.1. We note that the (terrestrial) Biosecurity Protocol will be approved by the LPA (Requirement 9 under CoCP). We agree with this approach and consider that this will appropriately manage INNS. However, we advise that NRW (A) is consulted prior to the discharge of Requirement 9. We also consider that minor amendments to the Outline Biosecurity Protocol (APP-223) is required to be made in order to ensure that the final version of the plan is based on a more robust outline version (e.g. the Plan should consider landscape planting, diseases that may affect protected species, and preventive techniques). In addition, although the Outline version refers to species listed under the provisions of European Protected Species which are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). We advise that it should also refer to the provisions under the Invasive Alien Species (Enforcement and Permitting) Order 2019.</p>	<p>The Applicant welcomes NRW's agreement that the final Biosecurity Protocol (as approved by the relevant planning authority) will appropriately manage INNS. The Applicant also notes that NRW would be consulted prior to the discharge of Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03).</p> <p>The Applicant considers that the Outline Biosecurity Protocol (APP-223) provides appropriate detail to undertake the site preparation works as defined in the draft DCO. The pre-construction surveys will not be limited to the INNS previously recorded during field surveys: paragraph 1.5.1.6 of the Outline Biosecurity Protocol (APP-223) explains that any other INNS identified during the pre-construction surveys will be recorded. The pre-construction surveys will be undertaken by appropriately qualified ecologists that are competent in the identification of INNS (paragraph 1.5.1.2 of the Outline Biosecurity Protocol (APP-223)). Landscape planting will primarily be undertaken at the end of the construction process. Where early landscape planting is undertaken during the site preparation works, paragraph 1.8.2.12 of the Outline Landscape and Ecology Management Plan (APP-280) explains that '<i>all tree stock should be materially free from pests, diseases, discolouration, weeds and physiological disorders</i>'.</p> <p>The Applicant considers the specific points raised by NRW are covered in the Outline Biosecurity Protocol (APP-223).</p>
RR-011.125	<p><b>3.5. Water Quality (Surface and Groundwater)</b>            F3.1 <i>Geology, Hydrogeology and Ground Conditions [APP-064]</i>            3.5.1. NRW (A) note the completion of a water feature survey and on the whole are satisfied with the baseline condition assessments. However, it is noted that private water supplies (PWS) located within this area. (PWS 02, 06, 07 and 08) require further site investigation and for mitigation measures to be agreed with the PWS owners – we should be informed of the mitigation measure employed so that the risk is assessed on site.</p>	<p>The Applicant welcomes NRW's comments regarding the baseline condition assessment. The baseline information was primarily gathered from questionnaires/surveys with landowners. The baseline information reported in Volume 7, Annex 7.1.2: Groundwater Sources of Supply – Hydrogeological Risk Assessment (APP-116), which provides a robust characterisation for the assessment of potential impacts on groundwater resources. For some private water supplies, further information is required from the landowners to provide a more detailed risk assessment. The outcome of the detailed risk assessment will determine the most appropriate option for mitigation from the hierarchy of measures. Measures to mitigate potential impacts on private water supplies will be set out in the final CoCP in line with section 1.4 of Volume 7, Annex 1.2: Groundwater Sources of Supply – Hydrogeological Risk Assessment (APP-116) and will be agreed with the relevant planning authority (rather than the landowner) following consultation with NRW (as secured in Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03)).</p>



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Reference	Relevant Representation Comment	Applicant's response
RR-011.126	3.5.2. We note that the method used on site for the trenchless cable routing will be confirmed at the detailed design stage. Once the trenchless method(s) has been confirmed all the risk assessments to controlled waters (groundwaters) should be updated to consider this method.	The method of trenchless technique(s) that will be used at the landfall and crossings along the onshore cable corridor will be confirmed during detailed design. The design of the crossings will be informed by site investigations and groundwater risk assessments (where required) as described in section 1.11.2 of the Outline Onshore Construction Method Statement (APP-227). This will be summarised in the detailed Landfall Construction Method Statement and the Onshore Construction Method Statement that will form part of the CoCP (as secured in Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03)).
RR-011.127	3.5.3. Cable routing around the historical landfill will be by trenchless cable routing methods (likely Horizontal Direction Drilling), this needs to be confirmed and a commitment that risks will be assessed to ensure the waste material and landfill engineering is not affected or impacted by the trenchless methods – this will prevent (minimise) the risk to controlled waters.	The method of crossing the landfall will be undertaken using trenchless technique(s). As stated in the Outline Landfall Construction Method Statement (APP-226) the selection of the technique will be determined during detailed design. The Outline Landfall Construction Method Statement forms part of the CoCP and is secured as Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03)). A final version of the Onshore Construction Method Statement will be agreed with the relevant planning authority.
RR-011.128	3.5.4. Reference is made to working near an old mine in Outline Onshore Construction Method Statement [APP-227]. Confirmation should be provided whether or not grouting will be required to be protective of groundwater and limit the risk to controlled waters.	The need for grouting will be determined during the detailed design stage. The design process will be informed by site investigations. Appropriate construction methods will be identified to ensure groundwater is protected and new pollutant pathways are not created. The detailed construction methods and mitigation measures will be reported in the final Onshore Construction Method Statement (APP-227).
RR-011.129	3.5.5. We, therefore, consider all of the above are minor amendments that should be made to the Outline Code of Construction Practice [APP-212] and the underpinning Outline Method Statements and Management Plans in order to ensure that the final version of the plan is based on a more robust Outline versions.	The Outline Code of Construction Practice and the accompanying outline method statements will be updated during the Examination process as required to incorporate comments from stakeholders.
RR-011.130	3.5.6. We note that the final Code of Construction Practice [APP-212] and the underpinning Method Statements and Management Plans must be submitted to and approved by the LPA (Requirement 9). We agree with this approach and consider that impacts on water quality (both surface and groundwater) will be appropriately managed and suitable mitigation measures will be adopted. We advise that NRW (A) is consulted prior to the discharge of Requirement 9.	This is noted and welcomed by the Applicant. As stated in the draft DCO (C1 Draft Development Consent Order F03) the detailed CoCP and Method Statements will be submitted to the relevant planning authority for approval following consultation with NRW.

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Reference	Relevant Representation Comment	Applicant's response
RR-011.131	<p><b>3.6. Flood Risk</b>  <i>F3.2 Environmental Statement Hydrology and Flood Risk [APP-065]</i>            3.6.1.1. Further to our previous comments on the PEIR, NRW (A) note that the comment relating to the glossary have been addressed and updated accordingly.</p>	<p>This is noted and welcomed by the Applicant.</p>
RR-011.132	<p>3.6.1.2. It is important to remind all interested parties that NRW on flood risk is associated with that risk posed from the Sea and Rivers as shown on the Flood Map for Planning (FMfP). Since the implementation of the Floods and Water Management Act 2010 in Wales, it is the local authorities acting as the Lead Local Flood Authority (LLFA), who manage flooding from ordinary watercourses, surface water (and ground water). Thus, it is the LLFA who are ultimately responsible for managing and advising on flood risk management related to Ordinary watercourses/Surface water and small watercourses. They would also advise/approve surface water management and normally as they are also the Sustainable Drainage Systems Approval Bodies (SABs). Thus, the views and comments from both Conwy County Borough Council and Denbighshire County Council should be sought on the documents relating to flood risk as they are the LLFA and the SAB in this instance.</p>	<p>The Applicant notes your response. Views have been sought from Conwy County Borough Council (CCBC) and Denbighshire County Council (DCC) during the application process. The Applicant will continue to engage with CCBC and DCC during the Examination process.</p>
RR-011.133	<p>3.6.1.3. With regard to paragraph 2.3.8.18, we are still awaiting confirmation from Welsh Government as to when the new Technical Advice Note (TAN) 15 will be published. The 2004 TAN15 remains the Policy in force.</p>	<p>The Applicant notes that 2004 TAN15 remains the Policy in force until the new TAN15 is published. Volume 7, Annex 2.1: Flood Consequences Assessment (APP-117) has been prepared in accordance with the guidance in both the 2004 and 2021 versions of TAN15.</p>
RR-011.134	<p>3.6.1.4. With regard to table 2.7. Assessment of significant effects - Construction phase – we note and accept that the landfall will be installed using trenchless techniques. It should be noted that this is the only section of the Mona Onshore Development Area that is shown to be within the Flood Zones 2 and 3 for flood risk from the Sea or Rivers as per the FMfP.</p>	<p>The Applicant notes your response.</p>
RR-011.135	<p>3.6.1.5. With regard to section 2.7.2.2 - any temporary change in runoff over the areas affected during construction,</p>	<p>The Applicant notes your response.</p>

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Reference	Relevant Representation Comment	Applicant's response
	such as temporary construction compounds, haul road, construction accesses will be subject to sustainable drainage systems approval from the respective SAB to ensure that changes and minimal/managed.	Management of surface water drainage during the construction process will be in accordance with the principles set out in the Outline Construction Surface Water Drainage Plan (APP-218) which is secured as part of the Code of Construction Practice under Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03). The final Construction Surface Water Drainage Plan will be prepared during detailed design and will be agreed with CCBC and DCC as the LLFA and SAB.
RR-011.136	3.6.1.6. With regard to section 2.7.2.4 - whilst all watercourse crossings for the haul road are on ordinary watercourses (and subject to consent from Conwy CBC/Denbighshire CC as Lead Local Flood Authorities), we suggest that bridged (or clear span) crossings would be preferable to culvert crossings. It should be noted that culverting of watercourses (regardless of length) may pose a high risk to the delivery of WFD objectives. On average the UK has one barrier to natural processes and ecosystem communities per kilometre of watercourse. The majority of those barriers are culverts. Physical modification (e.g. culverting) remains a high risk in the majority of Welsh catchments and the primary cause of waterbody failure is physical modification.	The Applicant notes NRW's preference to using bridged crossings for watercourses. The design of the haul road crossings of ordinary watercourses will be appropriate to the individual watercourse and will meet the engineering requirements of the Mona Offshore Wind Project. Principles of the crossing options are set out in the Outline Onshore Construction Method Statement (APP-227) which is secured as part of the Code of Construction Practice under Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03). The Applicant will consult with CCBC and DCC on the method and design of the crossings. The crossings will be constructed in accordance with the Onshore Construction Method Statement (APP-227)
RR-011.137	3.6.2. <i>Flood Consequence Assessments [APP-117]</i> 3.6.2.1. No further comments to those provided previously for the PEIR, our comments have been addressed and thus the relevant risk management authority (LLFA/SAB) should provide any additional advice.	The Applicant notes your response.
RR-011.138	3.6.3. <i>Surface watercourses and NRW Flood Zones [APP-118]</i> 3.6.3.1. The title of the document may be misleading by using 'Surface watercourses...'. There are no references to the mapped outlines for Surface Water and Small Watercourses as shown on the Flood Map for Planning for watercourses which have a catchment area less than 3km <sup>2</sup> . This is crucial since all of crossings along the route are those of small (ordinary) watercourses and the document should be updated to accordingly.	Volume 7, Annex 2.2: Surface watercourses and NRW Flood Zones (APP-118) uses data from NRW and Ordnance Survey to identify main rivers and ordinary watercourses. The Surface Water and Small Watercourses with a catchment of less than 3km (as shown on the Flood Map for Planning (FMfP)) will be added to figures 1.3 to 1.5 of Volume 7, Annex 2.2: Surface watercourses and NRW Flood Zones (APP-118) and the updated Figures 1.3 to 1.5 are submitted in Annex 3.10 of the Applicant's Responses to Relevant Representations (S_PD_3.10). These surface water features and small watercourses have been taken into account in the overall baseline hydrological characterisation as presented in Volume 3, Chapter 2: Hydrology and flood risk (APP-065) and Volume 7, Annex 2.3: Water Framework Directive surface water and groundwater assessment (APP-120) and

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	3.6.3.2. It is noted that 'ordinary' watercourses have been shown on figures 1.3 to 1.5 along with Main Rivers. It may therefore be useful to use the FMfP 'detailed view' to produce the flood outlines for Sea, for Rivers and for Surface Water and Small Watercourses.	therefore the characterisation remains robust. The small watercourses are also identified within Volume 5, Annex 5.3: Onshore crossing schedule (APP-083).
RR-011.139	3.6.4. <i>Outline Flood Management Plan (OFMP) [APP-219]</i> 3.6.4.1. This document is adequate to manage flood risk as an appendix to the Outline Code of Construction Practice document (Ref J26) [APP-212] for flood risk from the sea at landfall location.	This is noted and welcomed by the Applicant.
RR-011.140	3.6.4.2. However, there will be flood risk associated with the small watercourses/ordinary watercourses as a result of the onshore development route. It may be appropriate to also consider flood risk from these sources as shown on the Flood Map for Planning Flood zones 2 and 3 for Surface water and Small Watercourses. The respective LLFA would be able to advise if the management plan for this source of flood risk can be managed in any updated OFMP.	Measures to control surface water runoff and to manage flood risk during construction will be implemented in accordance with the Outline Construction Surface Water Drainage Plan (APP-218) which is secured as part of the Code of Construction Practice under Requirement 9 of the draft DCO. The measures will take into account the flood risk from small watercourses/ordinary watercourses (as shown on the FMfP Flood Zones 2 and 3 for Surface Water and Small Watercourses). Where watercourse crossings would be required along the Mona Onshore Cable Corridor and Mona 400kV Grid Connection Cable Corridor a 10% (1 in 10) Annual Exceedance Probability event standard is proposed to be used (see paragraph 1.7.1.1 of the Outline Construction Surface Water Drainage Plan (APP-218)). The final Construction Surface Water Drainage Management Plan and will be agreed with the respective LLFA prior to construction.
RR-011.141	<b>3.7. Materials and Waste</b> NRW (A) notes that the final Site Waste Management Plan [APP-221] will be approved by the LPA. We agree with this approach and consider that waste will be appropriately managed. NRW (A) should be consulted on the final Site Waste Management Plan [APP-221] as part of the Code of Construction Practice [APP-212] prior to discharge of Requirement 9.	This is noted and welcomed by the Applicant.
RR-011.142	<b>4. NRW REGULATION AND PERMITTING SERVICES: MARINE LICENSING – REGULATORY RESPONSE</b> The Welsh Ministers delegated functions for the administration and determination of Marine Licence applications under Part 4 of the Marine and Coastal Access Act 2009 to Natural Resources Wales. The representation	This comment is noted.

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	<p>below is provided by NRW's, marine licensing function (referred to as NRW MLT for the purposes of this representation) in respect of the proposal.</p>	
RR-011.143	<p><b>4.1. The Marine Licence proposals</b>            As set out within the Marine Licence Principles Document (APP-195), two Marine Licences are sought for the Mona Offshore Wind Project;</p> <ul style="list-style-type: none"> <li>• A Licence in respect of the Generation Assets, to be deemed as part of the Development Consent Order (DCO)</li> <li>• A separate Licence in respect of the Transmission Assets to be granted by NRW MLT.</li> </ul> <p>NRW MLT agrees that the DCO sought may, in principle, lawfully include provisions deeming a Marine Licence to have been issued for those marine licensable activities that are wholly within Welsh Offshore Waters in accordance with s149A of the Planning Act 2008. The Transmission Assets are located within both the Welsh inshore and offshore region and therefore cannot be deemed as part of the DCO and a separate Marine Licence is being sought from NRW MLT.</p>	This comment is noted.
RR-011.144	<p>The applicant submitted a Marine Licence application in respect of the Transmission Assets to NRW MLT on the 29 April 2024. The application is currently undergoing our validation checks and if/when accepted, NRW MLT will be commencing a consultation process with relevant consultation bodies and the public in relation to this application. It is anticipated that this application will be determined concurrently with the DCO examination, although it is currently not possible to provide an indicative timescale in respect of the determination. Although there are issues that substantively overlap between the determination of the DCO and the Transmission Assets Marine Licence application, it should be noted that the respective consents must be determined separately.</p>	This comment is noted.
RR-011.145	<p>NRW MLT, has determined that an Environmental Impact Assessment is not required in relation to the Marine Licence</p>	This comment is noted.

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	<p>for the Transmission Assets in reliance on Regulation 10 of the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended). This is on the basis that we are satisfied that an EIA assessment in respect of the project is to be carried out by the Secretary of State and that such assessment will be sufficient to meet the requirements of the EIA Directive. NRW MLT must take into account inter alia the conclusions of the Secretary of State's assessment, any conditions attached to the DCO, and mitigation and monitoring measures. A practical consequence of this therefore is that we would not be in a position to issue a Marine Licence for the Transmission Assets until the DCO has been issued.</p>	
RR-011.146	<p>NRW MLT in its delegated role as Licensing Authority will be responsible for determining any request to discharge conditions of a Marine Licence and therefore have a keen interest in ensuring that the provisions drafted in a deemed Marine Licence are appropriate to allow it to exercise this function.</p>	<p>This comment is noted.</p>
RR-011.147	<p>Although a number of Marine Licences have been deemed within DCOs in English Waters, this is the first deemed Marine Licence that has been sought in Welsh Waters.</p>	<p>This comment is noted.</p>
RR-011.148	<p>NRW MLT provided the applicant with a template Marine Licence and condition bank to aid with drafting. However, the applicant has sought to use deemed Marine Licences issued in English waters as their template for the proposed deemed Marine Licence. Although we are not opposed to this approach, there has been minimal pre-application engagement in regard to the drafting of the Licence therefore there remains a number of outstanding comments and concerns. The relevant representation below contains the key concerns surrounding the drafting of the Licence. Whilst a number of further comments on the drafting has been provided in Annex 1.</p>	<p>The Applicant welcomes NRW's comments on the deemed marine licence (dML) and has either made the changes in the dDCO(C1 Draft Development Consent Order F03) or explained why these cannot be accepted in (see rows RR-011.171 to RR-011.216). In addition to the engagement that took place with NRW at s42 statutory consultation on the draft DCO and dML (see section 5.7.36 of the Consultation report (APP-037)) and the drafting amendments that were made in response to NRW and other comments, NRW was provided with a draft of the dML prior to application but given time constraints there it was not possible to discuss in detail prior to submission of the application. In drafting the dML the Applicant has had regard to the precedent bank provided by NRW, including the recently granted Awel y Môr marine licences, however the format of the dML as part of the DCO statutory instrument, requires a particular style and approach to the drafting which the Applicant has adopted. As this is the first dML for which NRW is the regulator the Applicant has used precedent from English projects where the drafting has refined over a number of projects.</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>In order to assist both the ExA and NRW the Applicant has provided a Marine Licence Principles document (J9 Marine Licence Principles Document F02) explaining in detail how the dML provisions would align with the expected drafting of the separate NRW transmission marine licence. This has also been provided to NRW as part of transmission marine licence application and will be updated during the examination to reflect changes made to the drafting of the dML and assist both NRW and the ExA in understanding the alignment of the drafting.</p>
RR-011.149	<p><b>4.2. Decommissioning</b> The marine licensable activities in para 3 of schedule 14 of the draft DCO list construction, maintenance and operation of the scheme but there is no reference to decommissioning.</p>	<p>It is the Applicant's intention to secure decommissioning activities through separate standalone marine licences at the relevant time. Please see the Marine Licence Principles Document (J9 Marine Licence Principles Document F02), row 'Licence validity'. For this reason, Schedule 14 of the dDCO (C1 Draft Development Consent Order F03) does not reference decommissioning because consent for those activities is not being sought.</p>
RR-011.150	<p>Consultation Report Appendices Part 3 - reference Mon_054_542_010623 (APP-040), details that the applicant does not intend for the deemed Marine Licence to cover decommissioning activities. However, the Marine Licence Principles Document (APP-195) states that the deemed Marine Licence will include provisions for decommissioning. The Explanatory Memorandum (APP-024) section 1.2.1.1 details that the purpose of the DCO is for the construction, operation and decommissioning of the scheme.</p>	<p>The dDCO (C1 Draft Development Consent Order F03) does refer to decommissioning in the articles as the undertaker requires the consent to cover decommissioning of the onshore works. The Marine Licence Principles Document (J9 Marine Licence Principles Document F02) has been updated to remove reference to decommissioning as appropriate and clarifies that it is the Applicant's intention to secure decommissioning activities through separate standalone marine licences at the relevant time.</p>
RR-011.151	<p>The applicant should clarify whether it proposes to include decommissioning provisions within the deemed Marine Licence, and if so, amend the deemed Marine Licence accordingly to reflect this.</p>	
RR-011.152	<p>If licensable decommissioning activities are not included within the deemed Marine Licence, a further Marine Licence would need to be sought at a later date prior to decommissioning activities being carried out. This should be acknowledged by the applicant.</p>	
RR-011.153	<p>NRW MLT previous practice has included decommissioning activities alongside construction and maintenance within the Marine Licence.</p>	

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RR-011.154	<p><b>4.3. Transfer of the Licence</b>            Para 7 of Schedule 14 (deemed Marine Licence) of the draft DCO proposes to amend the provisions under s72 MACAA2009 for the transfer of the Marine Licence. Specifically, the applicant proposes that the powers to transfer should be given to the Secretary of State instead of the Licensing Authority. NRW MLT has concerns over the inclusion of this provision.</p>	<p>Article 7 of the dDCO (C1 Draft Development Consent Order F03) contains provisions for the transfer or lease of powers under the DCO. As set out in the Explanatory Memorandum (ASS-013) these provisions are based on the Model Provisions and the drafting has developed through their inclusion in all offshore wind farm development consent orders.</p> <p>Following the precedent drafting from other offshore wind farm orders article 7(2) provides the transfer or grant of DCO powers to take place with the written consent of the Secretary of State and article 7(5) provides for this transfer or grant to take place without the need for consent in the circumstances specified in the paragraph. Both of these allow for the transfer or grant of powers under the deemed marine licence. Article 7(3) requires the Secretary of State to consult NRW prior to the transfer or grant of the deemed marine licence under article 7(2) and NRW must be notified in advance of requesting the Secretary of State's consent for a transfer (see Article 7(9)).</p>
RR-011.155	<p>Neither the Explanatory Memorandum (APP-024) or Consultation Report Appendices Part 3 - reference Mon_054_545_010623 (APP-040), provides rationale for this change only noting that it has been used previously in deemed Marine Licences in English Waters.</p>	
RR-011.156	<p>NRW MLT's initial concerns in this regard are firstly whether such a provision would be lawful in amending the provisions of s72 of MACAA2009 and secondly that the inclusion of such provision would result in differentiating the arrangements for transfer for the generation/transmission Licences for the project. NRW MLT would also question the need for such provision when there is already an established mechanism set out in MACAA for the transfer of a Licence.</p> <p>Therefore, the applicant should provide further explanation and justification as to the need and lawfulness of this proposed provision.</p>	<p>Article 7(10) disapplies sections 72(2) and (8) of the Marine and Coastal Access Act 2009 in relation to a transfer or grant of the benefit of the deemed marine licence. The drafting in the dDCO reflects a long established precedent regarding the transfer of DCO powers and deemed marine licences that has been endorsed by the Secretary of State many times, including most recently in the Sheringham Shoal and Dudgeon Extensions Offshore Wind Farm Order 2024. Where a transfer of the deemed marine licence is sought under Article 7(2), the Secretary of State would consider the appropriateness of the party to whom the transfer or grant is proposed and would also take into account any representations made by NRW before determining whether to grant consent.</p> <p>From the procedural perspective it is important that the DCO and any deemed marine licence can be transferred together using the process set out in Article 7. As well as ensuring the timing of any transfer or grant is aligned and that it follows a prescribed process that is not provided for in the Marine and Coastal Access Act 2009, given the overlap between a number of the offshore articles and requirements (for example Articles 4, 6, 45 and 46 and Requirements 2, 3 and 20) within the DCO overlap and the deemed marine licence it would not be appropriate for those to be transferred separately. The Secretary of State has the ability to approve the transfer or grant of a dML such that the transfer or grant can fully reflect the relevant DCO and dML powers and avoid any inconsistency in position. Having deemed the marine licence in the DCO it is also appropriate that any transfer under the Order include the deemed marine licence as part of the wider transfer – it is one element of the wider order powers and should not be separated</p>



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		<p>out from the authority to construct, operate and maintain the NSIP granted by the order.</p> <p>The Planning Act 2008 is clear that marine licences may be deemed in a DCO in appropriate areas (s149A) and that a DCO may include such further provisions ancillary to the operation of that dML (s122(3)), including transfer along with the benefit. It is inarguable from the wording of section 122(5)(a) and (c) that a DCO may “apply, modify or exclude a statutory provision which relates to any matter for which provision may be made in the order” or “include any provision that appears to the Secretary of State to be necessary or expedient for giving full effect to any other provision of the order”. Deemed marine licences are clearly matter for which provision may be made in a DCO, section 72 MCAA 2009 is a provision relating to that deemed marine licence and the transfer power is accordingly authorised by s122 of the planning Act. The ability to transfer the dML is related to the deeming and is submitted to be a sensible, expedient part of the wider power to transfer the benefit of the order.</p> <p>There is accordingly no legal barrier to including these provisions in the dDCO and clear authority for their inclusion demonstrated by DCOs in English waters which have been repeatedly adopted by the Secretary of State based on the points outlined above.</p> <p>It is acknowledged that there would be a different approach between the dML and the standalone ML. However, this merely reflects the fact that one licence is included within the DCO and the other cannot be. The mere fact that a separate marine licence is required for the Mona transmission assets is not in itself a reason to depart from established precedent for the transfer of dMLs for offshore wind farms.</p>
RR-011.157	<p><b>4.4 Overlap between the generation and transmission Licences</b></p> <p>The Marine Licence Principles Document (APP-195) states that there is intentional overlap between the generation and transmission Licences in relation to the authorisation of offshore substation platforms and the inter-connector cables, which are duplicated within both Licences. The reason given being, that the location of the offshore substation platforms at this stage are unknown, likewise it is unknown at this stage whether the offshore substation platforms and inter-connector cables will be transferred to the Offshore</p>	This comment is noted.

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	Transmission Operator alongside the Transmission Assets in future.	
RR-011.158	The applicant has not provided details as to how the deemed Marine Licence can lawfully address this overlap, specifically ensuring that the deemed generation and transmission Licences when taken together do not authorise the construction of more than four offshore substation platforms.	The dDCO (C1 Draft Development Consent Order F03) contains appropriate controls to prevent more than four offshore substation platforms being constructed as part of the Mona offshore wind project.  The first is that Work No. 1 (the offshore generating station and related works) only permits the construction of 'up to four offshore substation platforms' (see Part 1, Schedule 1 of the dDCO). The second is that Requirement 2 permits a maximum of four offshore substation platforms as set out in Table 2 (see Schedule 2 of the dDCO). The third and final control is applied through Condition 18 of the dML which requires a design plan to be submitted to NRW for approval in writing prior to commencement of the authorised scheme (see Condition 18(1)(a), Part 2, Schedule 14 of the dDCO). As specified in the condition this design plan must contain the details of the number of offshore substation platforms and NRW will therefore have clear information as to what is being constructed under the dML and what is being constructed under the standalone ML. As noted in the Marine Licence Principles Document (J9 Marine Licence Principles Document F02) it is the Applicant's expectation that this condition will also be part of the standalone ML
RR-011.159	NRW MLT has previously dealt with similar issues by including the following condition on both licences:	
RR-011.160	No Works relating to the Offshore Substation Platform shall be carried out until the Licensing Authority has given written approval.  Such approval would be subject to confirmation/evidence being provided to NRW MLT demonstrating that the offshore substation platforms would not exceed the quantity assessed as part of the Environmental Statement.	
RR-011.161	In respect of the Marine Licence Principles Document (APP-195) itself, the applicant has detailed conditions it would anticipate being incorporated within the Marine Licence for the Transmission Asset (based on review of previous Marine Licences issued in Wales), and have compared these with those presented within the deemed Marine Licence for the Generation Asset. NRW MLT note that in some instances conditions which are detailed as anticipated within the Transmission Licence, are omitted from the deemed Marine Licence with no rationale provided for their omission. For example, where a Compliance Report has been proposed for the transmission Marine Licence, no such equivalent report has been proposed within the deemed Marine Licence. NRW MLT consider that further details are required to explain the justification for these omissions in the deemed Marine Licence.	The Applicant has sought to incorporate standard marine licencing conditions in the dML in a form appropriate for their inclusion in a statutory instrument. As such although the conditions are not replicated word for word, they are largely transposed. This is demonstrated in the Marine Licence Principles Document (J9 Marine Licence Principles Document F02). NRW has raised some specific points in their Relevant Representations about inconsistencies and these have been addressed.  The Applicant notes the comment regarding the compliance report and considers supplying such a report would not be necessary or proportionate given NRW will have the right to approve details prior to construction (as included in the dML conditions) and the undertaker will be constrained by those approvals in completing construction. Producing a compliance report would be unnecessary, burdensome and costly for the undertaker.
RR-011.162	<b>4.5. Approval of Plans</b> Condition 19(2) of the deemed ML provides that NRW must	The Applicant considers it necessary and appropriate to include a time limit for NRW to approve pre-commencement plans and has updated the drafting of the

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	<p>determine an application for approval made under condition 18 (pre-construction plans and documents) within a period of four months commencing on the date the application is received by NRW MLT. NRW MLT do not consider the condition necessary. There are no provisions under MACAA2009 for such time limits and it would not be consistent with NRW MLT's established practice to constrain its determination to a defined period.</p>	<p>dML to incorporate this time limit for conditions 20 and 21 (see Part 2, Schedule 14 of the dDCO; C1 Draft Development Consent Order F03). The time limit will ensure that the Applicant is able to proceed with the construction timeline without delays.</p> <p>The inclusion of Schedule 14, Condition 19(2) of the Draft DCO is standard in recent offshore wind DCOs; for example, Schedule 10, Condition 15(2) of the Sheringham and Dudgeon Extension DCO and Schedule 11, Condition 14(3) of the Hornsea Project Four DCO where in both cases, the condition text states that <i>"The MMO must determine an application for approval made under condition..."</i>.</p> <p>The programme between consent decision and commencement of construction is critical to meeting the project delivery programme and often complex with finalisation of project design, onboarding of key project contractors, and preparation, submission and discharge of pre-commencement consenting requirements. The inclusion of Schedule 14, Condition 19(2) of APP-023 will assist in maintaining the project delivery programme.</p>
RR-011.163	<p>We also note that time limitations (as set out in Condition 19(2)) are not proposed in respect of the approval of Plans under other conditions of the deemed Marine Licence, including condition 20 (the Underwater Sound Management Strategy) and condition 21 (related to UXO method statement). We consider this approach is appropriate and consider that the provision stated within 19(2) should be removed.</p>	<p>The Applicant considers it necessary and appropriate to include a time limit for NRW to approve pre-commencement plans and has updated the drafting of the dML to incorporate this time limit for conditions 20 and 21 (see Condition 19[x], Part 2, Schedule 14 of the dDCO; C1 Draft Development Consent Order F03). This time limit will ensure that the Applicant is able to proceed with the construction timeline without delays.</p>
RR-011.164	<p>Condition 21 related to UXO method statement details that a plan must be submitted for approval 3 months prior to commencement of unexploded ordnance clearance activities. We would request that this is increased to 4 months to align with timeframes set for other plans and to ensure sufficient time is given to allow detailed review and consultation as is necessary.</p>	<p>Schedule 14, Condition 21 of the Draft DCO (C1 Draft Development Consent Order F03) has been updated to reflect submission of a UXO clearance method statement 4 months prior to commencement of clearance activities.</p>
RR-011.165	<p><b>4.6. Reference to NRW as the Licensing Authority</b>  'NRW' is used by the applicant throughout the deemed Marine Licence as the Licensing Authority.</p> <p>NRW provides two distinct and separate function in relation to the Marine Licence. This includes in relation to its role</p>	<p>The dML has been updated to refer to the Licencing Authority instead of NRW. Please see dDCO (C1 Draft Development Consent Order F03).</p>

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	<p>acting on behalf of Welsh Ministers as the Licensing Authority, and secondly in its environmental advisor function and that of the Appropriate Nature Conservation Body. Therefore, for clarity and consistency with existing Marine Licences in Wales, we would request that the 'Licensing Authority' is used throughout the deemed Marine Licence in place of 'NRW' and the definition amended to detail that the Licensing Authority means NRW acting on behalf of the Welsh Ministers. This will also aid with consistency with the transmission Marine Licence.</p>	
RR-011.166	<p><b>4.7 Designated Disposal Site</b>            The applicant is proposing to designate a disposal site for disposal of material associated with the construction of the project. A site Characterisation Report has been provided for the Generation Asset (APP-205) and separate site Characterisation Report (APP-206) for the offshore cable corridor which is part of the Transmission Assets.</p>	<p>This comment is noted.</p>
RR-011.167	<p>It is established practice for NRW MLT to consider the designation of a disposal site and the suitability of material for disposal at sea during the determination of the Marine Licence application. As part of this determination NRW MLT would consult with independent external scientific advisors for specific advice on whether sufficient information has been provided for the designation of the disposal site, whether sufficient sampling has taken place by the applicant, whether the sampling has indicated that material is suitable for disposal at sea, and whether further monitoring will be required during the course of the Licence, in line with OSPAR guidelines. If this advice has not be sought by the Examining Authority we would need to consider this further.</p> <p>Where a disposal site is designated, a unique disposal site code would be allocated to the site by Cefas (Centre for Environment, Fisheries and Aquaculture Science) who lead and maintain an active list of all open and closed or disused sites in UK waters and allocate a unique reference to each site. NRW MLT would then include reference to this disposal site within the Marine Licence. As this is the first deemed</p>	<p>The designation of disposal sites for inclusion within the deemed marine licence schedule of a DCO application for offshore wind energy in English waters is managed by the Marine Management Organisation (MMO) in consultation with Cefas. Generally Cefas issue the disposal site code to the MMO for inclusion in the deemed marine licence during determination of the DCO application.</p> <p>Therefore, it is the Applicant's opinion that the established practice managed by NRW MLT for marine licence applications as set out in their relevant representation is applicable to the Mona Offshore Wind Project deemed marine licence. As such, it is anticipated that NRW MLT would engage with Cefas directly.</p>

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	Marine Licence issued in Wales, NRW MLT would seek clarity from the Examining Authority whether it is their intention to seek to designate the disposal site and obtain the appropriate disposal site code from Cefas during the determination of DCO and deemed Marine Licence.	
RR-011.168	NRW MLT would also request that sediment sampling results are provided by the applicant within the proforma provided on our website which aids with both consultation and ongoing OSPAR reporting should the application be positively determined.	See the Applicants response to NRW relevant representation in Annex 3.6 to Annex 3.9 (Document Reference S_PD_3.6 to S_PD_3.9).
RR-011.169	<p><b>4.8. Enforcement Authority</b></p> <p>The enforcement provisions in respect to conditions of a Marine Licence have not been delegated to NRW and remain with Welsh Government. This has been correctly identified within the deemed Marine Licence itself (Schedule 14 of the DCO), however the Environmental Statement Chapter 2 Policy and Legislative Context (APP-049 - section 2.3.3.2), incorrectly refers to NRW as the Enforcement body in respect to conditions of the Marine Licence.</p>	This comment is noted.
RR-011.170	<p><b>5. NRW's GENERAL PURPOSE</b></p> <p>NRW is satisfied that this advice is consistent with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources. In particular, NRW acknowledges that the principles of sustainable management include taking account of all relevant evidence and gathering evidence in respect of uncertainties, and taking account of the short-, medium- and long-term consequences of actions. NRW further acknowledges that it is an objective of sustainable management to maintain and enhance the resilience of ecosystems and the benefits they provide and, in so doing meet the needs of present generations of people without compromising the ability of future generations to meet their needs and contribute to the achievement of the well-being goals in section 4 of the Well-being of Future Generations (Wales) Act 2015.</p>	The Applicant notes the response.

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Reference	Relevant Representation Comment	Applicant's response
RR-011.171	<p><b>Schedule 14 deemed Marine Licence - Reference 1. Title-Marine Licence: Mona Offshore Wind Farm Generation Assets</b></p> <p>For consistency with NRW MLT established practice we require that a Marine Licence reference number is included, that being ORML2429G. We would suggest it is included within the title of Schedule 14 as follows;  “Marine Licence ORML2429G: Mona Offshore Wind Farm Generation Assets”</p>	<p>This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).</p>
RR-011.172	<p><b>Schedule 14 deemed Marine Licence - Reference 2. Definition -Commercial operation</b></p> <p>This definition has been provided in place of “commissioned” which appears to have been used in deemed Marine Licences elsewhere for this purpose. The applicant should explain why this term has not been adopted</p>	<p>The use of the term “commissioned” was considered to be confusing in the context of an offshore wind farm development where a commissioned project may not yet be in commercial operation. Pre-operation conditions should therefore be linked to commercial operation to suitably reflect that position. This approach has been preceded in the Sheringham Shoal and Dudgeon Extensions Offshore Wind Farm Order 2024.</p>
RR-011.173	<p><b>Schedule 14 deemed Marine Licence - Reference 3. Definition –Joint Nature Conservation Committee</b></p> <p>It is unclear why a separate definition of JNCC is provided. While separate definitions for other nature conservation bodies including NRW and Natural England have not been included. The applicant should explain the rationale for this. See also row 8 below.</p>	<p>The definition of Joint Nature Conservation Body in Paragraph 2, Schedule 14 of the dDCO (C1 Draft Development Consent Order F03) has been retained and updated to include reference to “JNCC”. This is to reflect the replacement of “statutory nature conservation body” with reference to JNCC throughout Schedule 14. Please see row RR-011.178 in addition.</p>
RR-011.174	<p><b>Schedule 14 deemed Marine Licence - Reference 4. Definition -measures to minimise disturbance to marine mammals and rafting birds from transiting vessels</b></p> <p>NRW MLT considers that this would be better referenced to as a Plan.</p>	<p>The term is derived from the name of the document and provides a clear link to that submitted application document (APP-203). No change is proposed.</p>
RR-011.175	<p><b>Schedule 14 deemed Marine Licence - Reference 5. Definition –Natural Resources Wales</b></p> <p>See para 4.6 of the relevant representation.</p>	<p>See row RR-011.165.</p>
RR-011.176	<p><b>Schedule 14 deemed Marine Licence - Reference 6. Definition –offshore in-principle monitoring programme</b></p> <p>NRW MLT consider that this should be renamed as an “outline” programme to be consistent with established practice. Unless the applicant is able to provide an</p>	<p>The Applicant considers the difference between ‘outline’ and ‘in principle’ to be one of semantics. The term here is derived from the name of the document (APP-201) and provides a clear link to that submitted application document. This follows the approach taken in other offshore wind DCOs. No change is proposed.</p>

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Reference	Relevant Representation Comment	Applicant's response
	explanation of the difference between an “in-principle” and “outline” programme.	
RR-011.177	<p><b>Schedule 14 deemed Marine Licence - Reference</b>  <b>7. Definition -Statutory Historic Body</b>            This should refer to CADW, Welsh Archaeological Trust, and Royal Commission on the Ancient and Historical Monuments of Wales, or its successor bodies.</p>	<p>The definition of statutory historic body has been updated to include reference to CADW, Welsh Archaeological Trust, and Royal Commission on the Ancient and Historical Monuments. The Applicant has referred to these in the alternative (using “or” rather than “and”) as it is assumed that NRW will not be required with all three bodies, every time the consultation of the statutory historic body is referred to in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03). However, the Applicant would welcome feedback on this point from NRW.</p>
RR-011.178	<p><b>Schedule 14 deemed Marine Licence - Reference</b>  <b>8. Definition -Statutory nature conservation bodies</b>            Clarity is required in order to understand which organisations this is referring to.</p>	<p>The definition of statutory nature conservation body has been removed from Schedule 14 of the draft DCO (C1 Draft Development Consent Order F03). Instead, the drafting of Schedule 14 now refers to the JNCC who are the statutory nature conservation body for the purpose of the deemed marine licence.</p>
RR-011.179	<p><b>Schedule 14 deemed Marine Licence - Reference</b>  <b>9. Definition –Co-ordinates - all coordinates are latitude and longitude degrees and minutes to two decimal places</b>            We request co-ordinates are provided in decimal degrees rather than degrees and minutes.</p>	<p>This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).</p>
RR-011.180	<p><b>Schedule 14 deemed Marine Licence - Reference</b>  <b>10. NRW Marine Licensing Team –contact details</b>            The following address should be included;            Welsh Government Offices            Cathays Park            King Edward VII Avenue            Cardiff            CF10 3NQ</p>	<p>This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).</p>
RR-011.181	<p><b>Schedule 14 deemed Marine Licence - Reference</b>  <b>11. Definition NRW Advisory – contact details</b>            Contact details not required and should be removed. No conditions within the deemed Marine Licence requires submission directly to NRW Advisory.</p>	<p>This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).</p>
RR-011.182	<p><b>Schedule 14 deemed Marine Licence - Reference</b>  <b>12. Para. 2(g) the disposal of up to 13,037,497 cubic metres of inert material of natural origin within Work No. 1 produced during construction drilling or seabed preparation for</b></p>	<p>The Applicant has updated Paragraph 5, Schedule 14 of the dDCO (C1 Draft Development Consent Order F03) to refer to Work No. 1 to clarify that the co-ordinates in Table 3 relate to the boundary of Work No. 1 and that all licenced marine activities must take place within Work No. 1.</p>

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	<p>foundation works, cable works and boulder clearance works.</p> <p>Rather than refer to disposal of material within Work No.1 we would consider the condition would be clearer if the boundary of the disposal activity referenced to the co-ordinates in Table 3. This should also reference the Disposal Site Code once the disposal site has been designated.</p>	
RR-011.183	<p><b>Schedule 14 deemed Marine Licence - Reference</b>  <i>13. Para. 2 Details of licensed marine activities</i>  <i>There is no reference to UXO clearance</i>            UXO clearance is a licensable activity therefore should be listed in condition 2.</p>	This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).
RR-011.184	<p><b>Schedule 14 deemed Marine Licence - Reference</b>            14. Para. 3            Work No 1            (c) up to four offshore substation platforms each fixed to the seabed by a foundation; and            (d) a network of subsea interconnector cables between the offshore substation platforms including cable crossings and cable protection; and</p> <p>Both (c) and (d) works are proposed to also be included within the non-deemed marine licence alongside the transmission assets</p> <p>Clarity is required to understand how the Marine Licence seeks to control this overlap, specifically ensuring that deemed Marine Licence and transmission Marine Licence when taken together do not authorise the construction of more than four offshore substation platforms</p> <p>See section 4.4 of the relevant representation.</p>	See rows RR-011.158 to RR.011-160.
RR-011.185	<p><b>Schedule 14 deemed Marine Licence - Reference</b>            15. Para. 3            Work 1 (d) the removal of material from the seabed required for the construction of Work No. 1 and the disposal of inert material of natural origin and/or dredged material within</p>	This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).



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	<p><b>Work No. 1</b> produced during construction drilling, and seabed preparation for foundation works, cable installation preparation such as sandwave clearance, boulder clearance and pre-trenching;</p> <p>See comment reference 12 above related to limiting the disposal area by the co-ordinates defined within Table 3 rather than reference to Work No 1.</p>	
RR-011.186	<p><b>Schedule 14 deemed Marine Licence - Reference 16. Para. 3</b>  <i>Work 1 (h)</i>  <i>(h) the use of extracted seabed material within gravity base foundations</i></p> <p>We consider that this should detail the maximum amount of material that can be used for this purpose.</p>	<p>The Applicant notes in row RR-011.55 that NRW (A) “are satisfied that the sediment removal is not likely to indirectly have an impact on designated features within Welsh inshore waters”.</p> <p>This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03) to set a volumetric limit on extracted seabed material that can be used within gravity base foundations.</p>
RR-011.187	<p><b>Schedule 14 deemed Marine Licence - Reference 17. Para. 4(f)</b></p> <p>See comment reference 12 rather than defining area by reference to Work No 1, we consider the area would be better defined by reference to Table 3.</p>	See row RR-011.182 above.
RR-011.188	<p><b>Schedule 14 deemed Marine Licence - Reference 18. Table 3</b></p> <p>Co-ordinates are listed as latitude and longitude degrees and minutes to two decimal places. This does not reflect the co-ordinates in the table. Regardless we would request that co-ordinates are provided in latitude and longitude decimal degrees.</p>	See row RR-011.179 above.
RR-011.189	<p><b>Schedule 14 deemed Marine Licence - Reference 19. Para. 6</b></p> <p>This licence remains 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</p>	This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).

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Reference	Relevant Representation Comment	Applicant's response
	<p>including any modification to the programme under section 108 (reviews and revisions of decommissioning programmes) of the 2004 Act, and the completion of such programme has been confirmed by the Secretary of State in writing.</p> <p>We request the following text is inserted to refer to requirement 20 of the DCO. This licence remains in force until the authorised scheme has been decommissioned <b>in accordance with the provisions of requirement 20</b> of this Order and a programme approved by the Secretary of State under section 106 (approval of decommissioning programmes) of the 2004 Act including any modification to the programme under section 108 (reviews and revisions of decommissioning programmes) of the 2004 Act, and the completion of such programme has been confirmed by the Secretary of State in writing.</p>	
RR-011.190	<p><b>Schedule 14 deemed Marine Licence - Reference 20.</b> <i>Decommissioning has not been included as a licensed activity</i></p> <p>See section 4.2 of the relevant representation</p>	See rows RR-011.149 to RR-011.153 above.
RR-011.191	<p><b>Schedule 14 deemed Marine Licence - Reference 21.</b> Para. 7</p> <p>The provisions of section 72 (variation, suspension, revocation and transfer) of the 2009 Act apply to this licence except that the provisions of section 72(7) and (8) relating to the transfer of the licence apply only to a transfer not falling within article 7 (benefit of order) of the Order.</p> <p>We request provision is removed. See further detail in section 4.5 of the relevant representation.</p>	See rows RR-011.154 to RR-011.156 above.
RR-011.192	<p><b>Schedule 14 deemed Marine Licence - Reference 22.</b> Para. 9.</p> <p>Any amendments to or variations from the approved details,</p>	This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).

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Reference	Relevant Representation Comment	Applicant's response
	<p>plans or schemes must be in accordance with the principles and assessments set out in the environmental statement, and approval for an amendment or variation may only be given where it has been demonstrated to the satisfaction of NRW that it is unlikely to give rise to any materially new or materially different environmental effects from those assessed in the environmental statement.</p> <p>Remove – do not consider necessary</p>	
RR-011.193	<p><b>Schedule 14 deemed Marine Licence - Reference 23. Table 4</b></p> <p>Some parameters we would have expected to see not present e.g.            Maximum volume of natural material for disposal,            Maximum total volume of scour protection (this could be split between generators and platforms)            Maximum volume of cable protection            Maximum footprint of cable protection            Maximum volume of extracted material to be used in gravity base foundations</p>	<p>The Applicant has addressed each of the points raised below:</p> <ul style="list-style-type: none"> <li>• Maximum volume of natural material for disposal – this is already included in the Draft DCO (C1 Draft Development Consent Order F03) under Schedule 14, Details of licenced marine activities, paragraph 2(g).</li> <li>• Maximum total volume of scour protection (this could be split between wind turbines and OSPs) – Table 4 under Schedule 14, Condition 10 has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).</li> <li>• Maximum volume of cable protection – Table 4 under Schedule 14, Condition 10 has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).</li> <li>• Maximum footprint of cable protection – Table 4 under Schedule 14, Condition 10 has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).</li> </ul> <p>Maximum volume of extracted material to be used in gravity base foundations - Schedule 14, Details of licenced marine activities, paragraph 3 (h) has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03) to set a volumetric limit on extracted seabed material that can be used within gravity base foundations as stated above in response to row RR-011.188.</p>
RR-011.194	<p><b>Schedule 14 deemed Marine Licence - Reference 24. Table 4 - Minimum distance between offshore surface structures within in a row</b></p> <p>Grammatical error “within in a row”</p>	<p>This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).</p>
RR-011.195	<p><b>Schedule 14 deemed Marine Licence - Reference 25. 11 The undertaker may at any time maintain the</b></p>	<p>This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>authorised scheme, except to the extent that this marine licence or an agreement made under this marine licence provides otherwise.</p> <p>We request the following text is inserted. The undertaker may at any time maintain the authorised scheme, <b>so far as is consistent with the provisions of this licence and</b> except to the extent that this marine licence or an agreement made under this marine licence provides otherwise.</p>	
RR-011.196	<p><b>Schedule 14 deemed Marine Licence - Reference</b> 26. Para. 11 (3) No maintenance works authorised by this marine licence may be carried out until an operations and maintenance plan in accordance with the outline operations and maintenance plan has been submitted to and approved by NRW in writing. Maintenance must be carried out in accordance with the approved <b>details</b>.</p> <p>Change “details” to Plan</p>	This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).
RR-011.197	<p><b>Schedule 14 deemed Marine Licence - Reference</b> 27. Para. 12 Any time period given in this marine licence to either the undertaker or NRW may be extended with the agreement of the other party, such agreement not to be unreasonably withheld or delayed.</p> <p>See section 4.5 of relevant representation in relation to requirement 19(2). We consider that this therefore should be amended to; Any time period give in the marine licence may be extended with the agreement of the Licensing Authority.</p>	This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).
RR-011.198	<p><b>Schedule 14 deemed Marine Licence - Reference</b> 28. Para. 13(b) those persons referred to in paragraph (a) must be requested to confirm receipt of a copy of this licence in writing to NRW within 28 days of receipt.</p>	This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).

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Reference	Relevant Representation Comment	Applicant's response
	<p>Not a general requirement in NRW Marine Licences we consider this could be removed.</p>	
RR-011.199	<p><b>Schedule 14 deemed Marine Licence - Reference 29. Para. 13(4)</b>            The information referred to in sub-paragraph (1)(a) must be available for inspection by an authorised enforcement officer at the locations set out in sub-paragraph (3)(b).</p> <p>Request that “authorised enforcement officer” is changed to “by officers appropriately authorised by the Licensing Authority and authorised Marine Enforcement Officers”</p>	<p>This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).</p>
RR-011.200	<p><b>Schedule 14 deemed Marine Licence - Reference 30. Para. 13 7 (b)</b>  <i>and confirmation of notification must be provided to NRW and the MEO within five days.</i></p> <p>Standard conditions used in previous NRW Marine Licences have not required that confirmation of notice to kingfishers is also sent to Marine Enforcement Officers</p>	<p>This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).</p>
RR-011.201	<p><b>Schedule 14 deemed Marine Licence - Reference 31. Para. 13 (8) and (9)</b></p> <p>Standard conditions used in previous NRW marine licences have not required that confirmation of notice is also sent to MEO.</p>	<p>This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).</p>
RR-011.202	<p><b>Schedule 14 deemed Marine Licence - Reference 32. Para. 16 (2)</b>            The undertaker must ensure that any coatings and treatments are suitable for use in the marine environment and are used in accordance with guidelines approved by the Health and Safety Executive and the Environment Agency Pollution Prevention Control Guidelines.</p> <p>This refers to pollution prevention control guidelines produced by the Environment Agency. NRW MLT has not</p>	<p>Reference to the Environment Agency Pollution Prevention Control Guidelines has been a standard in deemed Marine Licences for offshore wind energy for many years. However, following the comment from NRW MLT, the Applicant notes that the Environment Agency Pollution Prevention Control Guidelines have been withdrawn. Therefore, the Applicant will liaise with NRW MLT on alternative text for inclusion in Schedule 14, Condition 16(2) of the Draft DCO (C1 Draft Development Consent Order F03).</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>been provided with the Environment Agency's Pollution Prevention Control Guidelines referred to and therefore we are unable to confirm whether this reference is applicable.</p>	
RR-011.203	<p><b>Schedule 14 deemed Marine Licence - Reference 33. Para. 16 (7)</b>            In the event that any rock material used in the construction of the authorised scheme is misplaced or lost within the Order limits, the undertaker must report the loss in writing to NRW and the MEO within 48 hours and if NRW, in consultation with the MEO, reasonably considers such material to constitute a navigation or environmental hazard (dependent on the size and nature of the material) the undertaker must, in that event, demonstrate to NRW that reasonable attempts have been made to locate, remove or move any such material.</p> <p>We would advise that para. 16 (7), 16 (10) and 17 could be placed together as relate to the same issue.            We would request that 16 (7) is amended, that the undertaker must report the loss to NRW, MEO, Trinity House and the MCA.            The condition should also be amended that the undertaken must locate the material and recover it at its own expense unless otherwise approved by Licensing Authority. Examples of condition usually used as standard in NRW licences are below;  <b>Accident or Emergency</b>            3.7.1 If, by reason of force majeure any substances or articles are deposited otherwise than as permitted as part of the Licensed Activities or in the Licensed Area full details of the circumstances shall be notified to the Licensing Authority, Trinity House and the Maritime and Coastguard Agency within 48 hours of the incident occurring.</p> <p>3.7.2 If it is necessary for the Licence Holder to recover or remove any equipment, plant or machinery used to undertake the Licensed Activities that have been dropped as a result of an accident or emergency, the Licence Holder is</p>	<p>The Applicant has made updates to condition 17 of the dML to clarify the drafting. The Applicant does not consider further changes are, however, necessary. Through the drafting NRW will have the opportunity to determine whether a dropped object requires removal and direct that the undertaker removes that where it is reasonably to do so. The drafting is appropriate to ensure that the undertaker does not have to unnecessarily remove objects from the seabed. NRW will have the opportunity to approve the dropped object plan in writing prior to commencement of development (see Condition 18(1)(j), Part 2, Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>permitted to do so provided that the methodology for such recovery or removal has been approved by the Licensing Authority.</p> <p>Removal of Deposited Material If the Licensing Authority considers it necessary or advisable for the safety of navigation. The Licence Holder must remove any deposit specified by the Licensing Authority or Marine Enforcement Officers within one month of notice being given by the Licensing Authority, or as otherwise agreed, and shall not replace such material until the Licensing Authority has given its written approval.</p>	
RR-011.204	<p><b>Schedule 14 deemed Marine Licence - Reference 34. Para. 16 (10)</b> All dropped objects must be notified to NRW in accordance with the dropped objects plan. On receipt of a notice NRW may require relevant surveys to be carried out by the undertaker (such as side scan sonar) if reasonable to do so and if reasonable to do so NRW may require obstructions to be removed from the seabed at the undertaker's expense.</p> <p>This condition should be amended to provide that the undertaken must locate the material and recover it at its own expense unless otherwise approved by Licensing Authority. In addition, "if reasonable to do so" should be removed.</p>	
RR-011.205	<p><b>Schedule 14 deemed Marine Licence - Reference 35. Para. 17</b> If, due to stress of weather or any other cause, the master of a vessel determines that it is necessary to deposit the authorised deposits within or outside of the Order limits because the safety of human life or of the vessel is threatened, within 48 hours the undertaker must notify full details of the circumstances of the deposit to NRW, the MEO, Trinity House and the Maritime and Coastguard Agency.</p> <p>This condition should also be amended to include; (2) The unauthorised deposits must be removed at the</p>	<p>The changes made to the drafting of Condition 17 now clarify that all objects dropped will be subject to the dropped objects plan. See also comments in rows RR-011.203 to RR-011.204 above.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-011.206	<p>expense of the undertaker unless written approval is obtained from the Licensing Authority.</p> <p><b>Schedule 14 deemed Marine Licence - Reference 36. In connection with Para. 16(7), 16(10) and 17</b></p> <p>In line with establish practices NRW MLT requests that an additional condition is provided, as follows: If it is necessary for the undertaker to recover or remove any equipment, plant or machinery used to undertake the Licensed Activities that have been dropped as a result of an accident or emergency, the undertaker is permitted to do so provided that the methodology for such recovery or removal has been approved by the Licensing Authority. Reason: to allow for the recovery of objects that have been accidentally dropped when carrying out the Licenced Activity.</p>	<p>The Applicant notes NRW's comment but does not consider this condition to be necessary. It may also confuse the approach with regards to dropped objects and how those will be managed. This detail can be agreed through the dropped objects plan (see above rows RR-011.203 to RR-011.204) and does not need to form a specific condition on the face of the dML.</p>
RR-011.207	<p><b>Schedule 14 deemed Marine Licence - Reference 37. Para. 18 (1)</b></p> <p>No part of the authorised scheme may commence until the following (insofar as relevant to that activity or phase of activity) have been submitted to and approved in writing by NRW, in consultation with the relevant statutory nature conservation body Trinity House and the MCA as appropriate.</p> <p>We do not consider it necessary to list the consultation bodies within this condition, reference to specific consultation bodies can be removed. As drafted, NRW MLT considers that the reference to consultation bodies is imprecise, as it fails to specify which</p>	<p>Reference to consultation bodies such as the statutory nature conservation body, Trinity House and the Maritime Coastguard Agency (MCA) is usual in the 'pre-construction plans and documentation' condition of deemed marine licences. For example, see the development consent order as made for Hornsea Project Four<sup>1</sup> and Sheringham and Dudgeon Extension Projects<sup>2</sup>.</p> <p>Pre-commencement plans and documents usually approved in consultation with Trinity House and the MCA are:</p> <ul style="list-style-type: none"> <li>• Design plan (Condition 18(1)(a)) – safety of navigation, search and rescue and compliance with MGN654 and its annexes</li> <li>• Monitoring plan (Condition 18(1)(c)) – compliance of hydrographic surveys with requirements of MGN654 and its annexes</li> </ul>

<sup>1</sup> Schedule 11, Condition 13(1) (page 161) of Hornsea Four Offshore Wind Farm Order 2023: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010098/EN010098-002330-DCO%20Hornsea%204%20OWF%20signed.pdf>

<sup>2</sup> Schedule 10, Condition 13(1) (page 130) in Sheringham and Dudgeon Extensions Offshore Wind Farm Order 2024: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010109/EN010109-002343-SADEP%20DCO%20DESNZ%20170424.pdf>



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Reference	Relevant Representation Comment	Applicant's response
	<p>Plans are relevant and fall to be considered by those consultation bodies identified. It also fails to provide a complete list of consultees that would be required for the breadth of plans listed in section 18. If however the applicant maintains that reference to consultation bodies is considered necessary we consider that amendments will need to be made to ensure reference to consultation bodies are precise and directed to specific plans.</p>	<ul style="list-style-type: none"> <li>Offshore construction method statement (Condition 18(1)(d)) and the cable specification and installation plan in particular – safety of navigation and any changes to navigable depth</li> <li>Aids to navigation management plan (Condition 18(1)(h)) – safety of navigation</li> <li>Vessel traffic management plan and vessel traffic monitoring survey (Condition 18(1)(k)) – Safety of navigation</li> </ul> <p>Pre-commencement plans and documents usually approved in consultation with the statutory historic body are:</p> <ul style="list-style-type: none"> <li>Design plan (Condition 18(1)(a))(v) ‘any archaeological exclusion zones’ ensuring infrastructure avoids archaeological exclusion zones unless otherwise agreed with NRW and the statutory historic body</li> <li>Offshore written scheme of investigation for archaeology and protocol for archaeological discoveries (Condition 18(1)(f) and 18(2)) – safeguarding the historic environment</li> </ul> <p>Pre-commencement plans and documents usually approved in consultation with the JNCC are:</p> <ul style="list-style-type: none"> <li>Monitoring plan (Condition 18(1)(c)) – any monitoring plan for physical / biological environment receptors</li> <li>Offshore environmental management plan – particularly limbs (i) ‘marine pollution contingency plan’, (vi) ‘measures to minimise disturbance to marine mammals and rafting birds from transiting vessels’ and (vii) ‘measures to minimise the potential spread of invasive non-native species’ – to ensure plans adopt commitments made in outline plans and safeguarding of biological and physical environment receptors.</li> <li>Marine mammal mitigation protocol (Condition 18(1)(h)) – safeguarding of marine mammals</li> </ul> <p>The Applicant has updated Schedule 14, Condition 18 of the Draft DCO (C1 Draft Development Consent Order F03) to clarify consultation requirements for each pre-commencement plan / document.</p>
RR-011.208	<p><b>Schedule 14 deemed Marine Licence - Reference</b> 38. Para. 18 (c ) (iii) (iii) at least four months prior to the authorised scheme being brought in commercial operation scheme, details of operational monitoring, if required</p>	See row RR-011.172 above.

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Reference	Relevant Representation Comment	Applicant's response
	<p>See comment row 2. This would be useful to understand why the change from commissioning which appears to have been used in other deemed Marine Licences.</p>	
RR-011.209	<p><b>Schedule 14 deemed Marine Licence - Reference 39. Para. 19 (2)</b>            NRW must determine an application for approval made under condition 18 within period of four months commencing on the date the application is received by NRW, unless otherwise agreed in writing with the undertaker.</p> <p>We consider this should be removed see section 4.5 of the Relevant Representation</p>	<p>See row RR-011.162 above.</p>
RR-011.210	<p><b>Schedule 14 deemed Marine Licence - Reference 40. Para. 21 (2)</b>            The method statement (excluding the information required under sub-paragraphs (1)(a)(ii) and (1)(a)(iii)) and the marine mammal mitigation protocol must be submitted to NRW for approval at least three months prior to the date on which unexploded ordnance clearance activities are intended to begin</p> <p>We would request that this is amended from 3 to 4 months to align with other plans proposed.            We remain unclear why (1)(a)(ii) and (1)(a)(iii) are excluded from the information required to be submitted to NRW with the method statement. If not provided with the method statement when would this information be available? And when would this be provided for approval?</p>	<p>As per RR-011.164, Schedule 14, Condition 21 of the Draft DCO (C1 Draft Development Consent Order F03) has been updated to reflect submission of a UXO clearance method statement 4 months prior to commencement of clearance activities.</p> <p>Condition 21(1)(a)(ii) and 21(1)(a)(iii) excluding submission to NRW of 'a plan showing the area in which clearance activities are proposed to take place' and 'a programme of works' represents a drafting error – both plans / document will be issued to NRW for approval 4 months prior to commencement of clearance activities. This has been deleted in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).</p>
RR-011.211	<p><b>Schedule 14 deemed Marine Licence - Reference 41. Para. 21(4)</b>            Subject to sub-paragraph (5), an unexploded ordnance close-out report must be submitted to NRW and the relevant statutory nature conservation body within three months following the end of the unexploded ordnance clearance activity and must include the following for each detonation undertaken</p>	<p>The Applicant requests a 3-month period to allow for document control and quality assurance processes including sufficient time for the UXO clearance contractor to prepare the draft report, two iterations of client review and contractor updates and final approval of the document prior to issue to NRW. The 3-month window also recognises that the Applicant's consents compliance team will likely to be in the proses of managing preparation of a number of pre-commencement plans and documents.</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>Unclear why 3 months is required to submit a close out report post activity. The information proposed in the close out report does not seem extensive and therefore would request that a shorter timeframe be considered.</p>	
RR-011.212	<p><b>Schedule 14 deemed Marine Licence - Reference 42. Para. 21 4(b)</b>            whether any mitigation was deployed including feedback on practicalities of deployment of equipment and efficacy of the mitigation where reasonably practicable, or justification if this information is not available.</p> <p>We require further clarity regarding the purpose of this condition.</p>	<p>Condition 21(4)(b) has been adopted from existing DCOs (see for example, East Anglia TWO<sup>3</sup>). The condition recognises that mitigation may not be applied in all UXO clearance instances, for example, where a 'low order' clearance technique is used such as 'deflagration'. The condition therefore secures the provision of feedback from the Applicant to NRW on whether mitigation was deployed for each UXO clearance instance. Reference to feedback on practicalities of deployment of equipment and efficacy of the mitigation is included to further the knowledge base.</p> <p>Any requirements for UXO clearance mitigation will be agreed with NRW through the UXO clearance method statement, marine mammal mitigation protocol and underwater sound management strategy which are secured in Schedule 14 of the draft DCO (C1 Draft Development Consent Order F03) under Condition 21(1)(a), Condition 21(1)(b) and Condition 20 respectively.</p>
RR-011.213	<p><b>Schedule 14 deemed Marine Licence - Reference 43. Para. 22</b>            No part of the authorised project may commence until NRW, 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" (or any equivalent guidance that replaces or supersedes it) and its annexes.</p> <p>We advise that there is modification of the condition as follows, consistent with NRW MLT established practice;            No part of the Licensed Activities may commence prior to</p>	<p>This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).</p>

<sup>3</sup> Schedule 13, Condition 16(5)(b) (page 139) of the East Anglia TWO Offshore Wind Farm Order 2022: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-010063-EA2%20-%20DCO%20-%20Registration%20Version.pdf>

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Reference	Relevant Representation Comment	Applicant's response
	<p>written approval from the Licensing Authority in consultation with the Maritime and Coastguard Agency that a Search and Rescue checklist has been agreed and is in place in line the requirements of MGN654 "Offshore Renewable Energy Installations (OREIs) – Guidance on UK Navigational Practice, Safety and Emergency Response" (or any successor document).</p>	
<p>RR-011.214</p>	<p><b>Schedule 14 deemed Marine Licence - Reference 44. Para. 23 (1) (b)</b>  a completed Hydrographic Note H102 each week during the construction of the authorised scheme listing the vessels currently and to be used in relation to the licensed marine activities.</p> <p>We require clarify as to what is meant by Hydrographic Note H102.</p>	<p>Reference to 'Hydrographic Note H102' was adopted from previous deemed marine licence. However, it does not appear to be an appropriate format for reporting current and future vessel usage in relation to the licensed marine activities. Reference to 'Hydrographic Note H102' has been deleted in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).</p>
<p>RR-011.215</p>	<p><b>Schedule 14 deemed Marine Licence - Reference 45. Para. 26.—(1)</b>  The undertaker must, in discharging condition 18(1)(c) submit details (which accord with the offshore in-principle monitoring plan) for approval in writing by NRW in consultation with the relevant statutory nature conservation body of proposed post-construction monitoring, including methodologies and timings, and a proposed format, content and timings for providing reports on the results.</p> <p>We consider that the condition should also require that Reports on the results of monitoring should be provided to the Licensing Authority no later than four months following receipt by the undertaker of the results of monitoring to which it relates, unless otherwise agreed with the Licensing Authority in writing.</p>	<p>The Applicant does not think it is necessary to define timescale for issue of monitoring reports to NRW as Schedule 14, Condition 26(1) requires that the Applicant agrees the "<i>timings for providing reports on the results</i>". However, the Applicant is willing to amend the Condition 26(1) to include the timescale of 'four months' and caveat of 'unless otherwise agreed with the Licencing Authority in writing'. This has been updated in Schedule 14 of the dDCO (C1 Draft Development Consent Order F03).</p>
<p>RR-011.216</p>	<p><b>Schedule 14 deemed Marine Licence - Reference 46.</b> We require a Compliance Report to be submitted for approval prior to commencement of any licensable activity. The compliance report should identify all relevant Plans and monitoring which is applicable to associated works.</p>	<p>See row RR-011.161 above.</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>We proposed the condition below consistent with established practice for previous licences; The Licence Holder must produce and submit a report on compliance with the conditions in this Marine Licence for the approval of the Licensing Authority at least 2 months prior to commencement of the Licensed Activities or an individual phase of Licenced Activities.</p> <p>The report must identify where the monitoring has been or is to be undertaken for each phase of construction and identify relevant plans and how conditions have been and are to be addressed. No Licensed Activities may be undertaken prior to written approval from the Licensing Authority.</p>	

## 2.12 Cyngor Sir Ynys Mon

Table 2.12: RR-012 – Cyngor Sir Ynys Mon

Reference	Relevant Representation Comment	Applicant's response
RR-012.1	The Isle of Anglesey County Council (the Council) confirms that it wishes to be identified as an Interested Party to take part in the examination of the Mona Offshore Wind Farm application for a Development Consent Order (DCO).	The Applicant notes the Council's response.
RR-012.2	This representation provides an overview of the key matters of interest to the Council in relation to the proposed project and provides an initial outline of our current position with respect to the matters of interest.	The Applicant notes the Council's response.
RR-012.3	<p>Seascape, Landscape and Visual Impacts</p> <p>Having reviewed the Environmental Statement (ES), the Council is concerned that the assessment of significance and its reporting, differs from the main EIA methodology used by other disciplines and LVIA best practice.</p> <p>Seascape, Landscape and Visual Impacts</p> <p>The Council has requested further clarification from the applicant to justify the choice of methodology and its application. Until then, the Council cannot confirm if it agrees with the assessment of potential effects on the Anglesey Area of Outstanding Natural Beauty (AONB) and the Wales Coast Path.</p>	<p>The Applicant understands that the councils concern is regarding the assessment methodology within Volume 3, Chapter 6: Landscape and visual resources (APP-069) and Volume 2, Chapter 8: Seascape and visual resources (APP-060)</p> <p>Potential seascape, landscape and visual effects (the impact of the Mona Offshore Wind Project) have been assessed by considering the amount or 'magnitude' of change/impact, compared with the baseline conditions, likely to be experienced by seascape and landscape character areas and visual receptors (people) as a result of implementing the Mona Offshore Wind Project. Magnitude is then weighed against the sensitivity (to the Mona Offshore Wind Project) of the seascape, landscape or visual receptor in question to arrive at a judgement on the level of effect. The sensitivity of a given receptor is assessed by considering both its inherent value and its susceptibility to the type of development proposed. Finally, a judgement is made on whether the predicted seascape, landscape or visual effect is likely to be significant or not significant. This framework methodology is in line with that presented in Volume 2, Chapter 5: Environmental Impact Assessment Methodology (APP-052).</p> <p>The state of environmental impact assessment in the UK (Institute of Environmental Management and Assessment, 2011) (IEMA 2011) notes that <i>"In reporting the EIA's findings, ESs often set out a generic methodology at the start of the document indicating that significance has been assessed using a standard matrix style approach, with magnitude on one axis and receptor sensitivity on the other" ... "Despite this, it remains relatively common for one or more ES chapters to use an alternative approach. This is not a legal concern, as there is no</i></p>

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Reference	Relevant Representation Comment	Applicant's response
		<p><i>regulatory requirement to apply the same methodological approach to significance evaluation across an EIA” (IEMA 2011, page 60, section 6.3).</i></p> <p>The methodologies tailored for the assessment of the Mona Offshore Wind Project is based on the Guidelines for Landscape and Visual Impact Assessment (Landscape Institute and Institute of Environmental Management and Assessment, 2013) (GLVIA3) which recommends that an LVIA/SLVIA “concentrates on principles and process” and “does not provide a detailed or formulaic recipe” to assess effects, it being the “responsibility of the professional to ensure that the approach and methodology are appropriate to the task in hand” (preface to GLVIA3, page x). GLVIA is the best practice guidance for SLVIA and LVIA.</p> <p>When judging the overall significance of effect, GLVIA3 reiterates the need to clearly distinguish between effects which are significant and those which are not. At paragraph 3.32, GLVIA3 explains that there are no hard or fast rules about what effects should be deemed to be significant. The assessments within Volume 3, Chapter 6: Landscape and visual resources (APP-069) and Volume 2, Chapter 8: Seascape and visual resources (APP-060) are steered by the proportionality principle expressed in the paragraph 1.17 of GLVIA3 “Identifying significant effects stresses the need for an approach that is in proportion to the scale of the project that is being assessed and the nature of its likely effects. Judgement needs to be exercised at all stages in terms of the scale of investigation that is appropriate and proportional. This does not mean that effects should be ignored, or their importance minimised but that the assessment should be tailored to the particular circumstances in each case”.</p> <p>For the purposes of the Mona Offshore Wind Project assessment ‘moderate’ effects can be either significant or not significant, depending on the context of the resource or receptor. In most cases an effect of moderate is most likely not to be significant, as set out in DTI 2005 (page 80) and White 2020(paragraph 5.11).</p> <p>Note: The IEMA 2011 document referred to in GLVIA3, paragraph 3.32 and earlier in this response has not been superseded and the points made in it remain relevant.</p> <p>On determining the significance thresholds of effects IEMA 2011 notes that the EIA Regulations do not set out terms for evaluating whether the assessment’s findings are significant or not (IEMA 2011, page 61, section 6.3). Full description and justification for the assessment methodology is presented in Volume 6, Annex 8.4: Seascape, landscape and Visual Resources Impact Assessment Methodology (APP1-4) and - Volume 7, Annex 6.4: Landscape, seascape and visual impact assessment methodology (APP-156).</p>

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Reference	Relevant Representation Comment	Applicant's response
		*White 2020 (NPS EN-3, paragraph 2.8.208) sets out SLVIA methodology, which is not the same as other topics, i.e. the UK Government (as well as IEMA 2011) also accepts that SLVIA methodology is/can be different to other topics.
RR-012.4	<p>Socio-Economic Opportunities and benefits</p> <p>The ES confirms that the project has the potential to stimulate beneficial economic impacts to North Wales by creating jobs and supply chain opportunities.</p> <p>Socio-Economic Opportunities and benefits</p> <p>Throughout its pre-application engagement with the applicant, the Council has confirmed the need for the DCO application to identify and confirm how local and regional job, skills and supply chain opportunities are to be maximised and secured.</p>	<p>The assessment Volume 4, Chapter 3: Socio-economics (APP-077) predicts beneficial economic effects will occur in North Wales as a result of the Mona Offshore Wind Project.</p> <p>An Outline Skills and Employment Plan (OSEP) was submitted as part of DCO application (APP-210). The Plan sets out opportunities for engagement to enable local workers and training providers to prepare for the anticipated employment opportunities associated with the Mona Offshore Wind Project.</p> <p>The OSEP sets out an outline approach that will be finalised following the grant of the DCO and adopted by the Applicant to help develop and support the economic benefits associated with the Mona Offshore Wind Project in relation to skills and employment within the offshore wind sector. The final skills and employment plan, which will be informed by a community needs analysis and further key stakeholder engagement, will be secured through requirement 19 in the draft DCO.</p>
RR-012.5	<p>Socio-Economic Opportunities and benefits</p> <p>Discussions have underlined the importance of engaging early and proactively with key stakeholders, including higher education providers and the local and regional supply chain to define the projects' skills and supply chain requirements and to be proactive in ensuring alignment to ensure opportunities are capitalised upon to realise maximum socio-economic benefits.</p>	<p>The Applicant is a partner of The Offshore Energy Alliance, a newly established offshore and energy supply chain cluster for the North Wales and North West region of the UK. The Alliance is a collective of public and private partners who work together under one umbrella, to promote wider involvement in offshore wind and other low carbon energy sectors. In addition, the applicant continues to engage with the Regional Skills Partnership which is one of four partnerships across Wales, bringing together employers, skills providers and key local stakeholders to better understand employer skills needs at a local and regional level.</p>
RR-012.6	<p>Socio-Economic Opportunities and benefits</p> <p>The Council welcomes the submission of an Outline Skills and Employment Plan that forms part of the DCO application that outlines the applicants proposed approach to working with local and regional stakeholders to maximise the opportunities associated with the project. The Council also welcomes the requirement (requirement 19 of the draft DCO) that requires the approval of a final detailed Skills and Employment Plan.</p>	<p>The Applicant welcomes and looks forwards to future engagement the IoACC on this topic.</p>
RR-012.7	<p>Socio-Economic Opportunities and benefits</p> <p>The Council intends to provide comments on the Outline Skills and Employment Plan directly to the applicant and will</p>	



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Reference	Relevant Representation Comment	Applicant's response
	update the Planning Inspectorate at the appropriate time in relation to its position regarding the Plan.	
RR-012.8	<p>Socio-Economic Opportunities and benefits</p> <p>It is welcomed that Holyhead Port is included on the long list of potential ports for the construction/decommission and operations and maintenance phases. The Council recommends that engagement continues with the Port operator to ascertain how the Port can support the development and delivery of the project, which in turn will secure additional and meaningful local benefits.</p>	<p>The Applicant welcomes the Council's comments regarding Holyhead Port. The Applicant has engaged with Holyhead Port Authority as part of a wide ranging port engagement process, and will continue to review a range of potential opportunities for port facilities and engage with relevant port operators. The Applicant notes the successful joint Freeport Bid between Cyngor Sir Ynys Mon and Stena Line Ports Ltd and would welcome future engagement to understand more about the designation.</p>
RR-012.9	<p>Socio-Economic Opportunities and benefits</p> <p>A joint Freeport Bid between the Council and Stena Line has recently been successful. The Council is confident that the Freeport status<sup>1</sup>, through its anticipated economic facilitations and regulatory easements, will create a business environment that is appealing for potential investors and businesses within the energy sector.</p>	
RR-012.10	<p>Socio-Economic Opportunities and benefits</p> <p>The Council confirms that it wishes to continue to engage with the applicant to identify how the Anglesey Freeport can benefit the project and secure long term and worthwhile socio-economic benefits for the Island and the wider North Wales region.</p>	

## 2.13 Defence Infrastructure Organisation

Table 2.13: RR-013 – Defence Infrastructure Organisation

Reference	Relevant Representation Comment	Applicant's response
RR-013.1	<p>MOD comments as submitted by email at 10.57am on 2nd May 2024. The development proposed has the potential to impact on the operation and capability of MOD safeguarded sites and assets.</p>	<p>The Applicant notes the response.</p>
RR-013.2	<p>Mona Offshore Windfarm</p> <p>Statutory Consultation under section 42 of the Planning Act 2008 ('the Act') and Regulations 11 and 13 of the Infrastructure Planning (Environmental impact Assessment) Regulations 2017 ('the 2017 Regulations'). (Developers Reassessment)</p> <p>I write to confirm the safeguarding position of the Ministry of Defence (MOD) with respect to the changes to wind turbine parameters and dimensions proposed by the applicant.</p> <p>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.</p> <p>The revised development array would comprise the following infrastructure components: up to 96 wind turbine generators (with a maximum blade tip height of 364 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.</p>	<p>The Applicant notes the response. An overview of the design parameters of the Mona Offshore Wind Project has been presented within Volume 1, Chapter 3: Project description (APP-050).</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-013.3	<p>The MOD previously responded to consultation on a Preliminary Environmental Information Report (PEIR) through a letter dated 23 June 2023 setting out potential concerns that the development would impact on the operation and capability of MOD sites and/or assets.</p> <p>The amendments proposed would not remove the requirement that the development is fitted with appropriate aviation safety lighting or that sufficient data is submitted to ensure the development is accurately charted.</p>	<p>The Applicant notes your response. The MOD response to the PEIR confirmed that based on the maximum design scenario for wind turbine tip height presented at PEIR of 324 m above lowest astronomical tide (LAT), there would be no operational impact on the radar system at Warton Aerodrome or RAF Valley (see also the response to RR-013.3 below). The MOD specifically stated that <i>"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"</i> (see Mon_202_004_230623 in section D.25.26 of the Consultation Report Appendices - Part 3 (D.25 - F) (APP-040).</p> <p><i>Regarding appropriate aviation safety lighting and accurate charting of the project, the Draft DCO (C1 Draft Development Consent Order F03) secures a commitment to implement aviation safety lighting under Schedule 2, requirement 3(1) and accurate charting under Schedule 2 requirement 3(2)(e).</i></p>
RR-013.4	<p>The development proposed has the capacity to impact on the operation and capability of radar systems sited at Warton Aerodrome and at RAF Valley. Specifically, the development will be detectable by Air Traffic Control Radar(s) deployed at RAF Valley and Warton Aerodrome. The impact of the turbines on the ATC radars at RAF Valley and Warton Aerodrome may need to be addressed through suitable technical mitigation solutions. It is the applicant's responsibility to provide a suitable technical mitigation solution to the MOD.</p>	<p>Following confirmation from MOD at PEIR that there would be no operational impact on the radar system at Warton Aerodrome or RAF Valley (see response to RR-013.2 above), the Applicant wrote to MOD on 16<sup>th</sup> October 2023 to inform of an increase in wind turbine tip height from 324 m to 364 m above LAT. On the 22<sup>nd</sup> January 2024, MOD responded to the Applicant to explain that they would commence consideration of the increased wind turbine tip height.</p> <p>On 5<sup>th</sup> March 2024, MOD informed the Applicant that the project has the capacity to impact on the operation and capability of radar systems sited at Warton Aerodrome and at RAF Valley. On 15<sup>th</sup> April 2024 MOD requested relevant project information, such as co-ordinates of the Mona Array Area and Mona Offshore Cable Corridor to allow MOD to complete an assessment of the potential effects of the proposal on MOD assets. On 23<sup>rd</sup> April 2024, MOD confirmed that they have the pertinent information to allow them to undertake their assessment. At this stage discussions with the MOD are ongoing regarding the potential impacts and any mitigation measures required. The Applicant will continue to engage with the MOD throughout the Examination and notes that the Examining Authority has requested submission of an initial Statement of Common Ground (SOCG) between the parties at Deadline 1 (7<sup>th</sup> August 2024).</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-013.5	<p>The potential presence of unexploded ordnance (UXO) has been identified as a relevant consideration. The potential presence of UXO and disposal sites is also a relevant consideration to the installation of cables and other intrusive works that may be undertaken in the maritime environment.</p>	<p>As set out in section 3.5.3 of Volume 1, Chapter 3 Project description of the Environmental Statement (APP-050) a pre-construction survey will be undertaken to identify potential UXO requiring clearance, with the requirement to submit a location plan and clearance methodology, amongst other relevant documents, to the licencing authority prior to UXO clearance activities as secured within the Schedule 14, Condition 21 of the Draft DCO (C1 Draft Development Consent Order F03) and proposed to be secured in the standalone marine licence.</p> <p>There are no disposal sites in the vicinity of the Mona Offshore Wind Project as shown in figure 10.2 in Volume 2, Chapter 10 Other sea users of the Environmental Statement (APP-062).</p>
RR-013.6	<p><b>Highly Surveyed Routes</b></p> <p>The MODs response dated 23 June 2023 identified that the far south of the wind farm array area fell within oil and gas blocks which contain a highly surveyed route. These routes are retained by the MOD to support national defence requirements and are not defined in the public domain. Highly surveyed routes must not be obstructed or impeded by offshore developments such as wind turbines. The updated proposed development area for the windfarm does not interfere with any Highly Surveyed Routes addressing the associated concern set out in the MOD letter dated 23 June 2023.</p>	<p>MOD made the Applicant aware of the highly surveyed route on the 23<sup>rd</sup> June 2023 through the statutory consultation process. In response, the Applicant revised the southern boundary of the Mona Array Area to avoid the highly surveyed area during the post-PEIR refinement process as set out in section 4.11.2 and Table 4.23 of Volume 1, Chapter 4 Site Selection and Consideration of Alternatives of the Environmental Statement (APP-051).</p>
RR-013.7	<p>The export cable will make connection to the National Grid at Bodelwyddan. The export cable, between the array area and the North Wales coast, will cross the highly surveyed route. Cable route crossings are acceptable so the MOD has no concerns with the proposed cable route corridor, however, the MOD wishes to be notified of the final export cable route so the crossing can be noted in the Navy's records.</p>	<p>The Applicant will notify the MOD of the final export cable route which will be captured in the SOCG.</p>

## 2.14 Design Commission for Wales

**Table 2.14: RR-014 – Design Commission for Wales**

Reference	Relevant Representation Comment	Applicant's response
RR-014.1	The Design Commission for Wales wish to submit the report from the Design Review we held for the Mona Offshore Wind Farm project.	The Applicant welcomes Design Commission for Wales's Representation. See responses to the specific points made in the report in the rows below.
RR-014.2	<p><u>Key Points</u></p> <p>The process that has been undertaken to date was presented clearly and concisely demonstrating a rigorous process that has been followed.</p>	The Applicant is pleased to note that the Design Commission for Wales considers that the processes used by the Mona Offshore Wind Project to select a site and develop landscape proposals have been rigorous.
RR-014.3	A narrative is needed that reflects the qualitative commitments and ambition of the project beyond the technical requirements and how this translates into stewardship of a piece of the community in which the onshore interventions are located.	<p>A narrative reflecting the qualitative commitments made by the Applicant in relation to landscape design is presented in section 3.9.1 of the Design Principles (APP-189). Further information is provided in section 1.7 of the Outline Landscape and Ecology Management Plan (APP-208) which lists the outline principles and commitments which include:</p> <ul style="list-style-type: none"> <li>• Landscape integration</li> <li>• Landscape amenity</li> <li>• Biodiversity retention</li> <li>• Biodiversity enhancement</li> </ul>
RR-014.4	The narrative should reflect a positive, enhancing approach to the landscape rather than just mitigating impact.	<p>Section 1.7 of the Outline Landscape and Ecological Management Plan (APP-208) includes a narrative that explains the landscape integration of the onshore substation for the Mona Offshore Wind Project.</p> <p>The approach to landscape integration is to provide an appropriate setting that manages the visual impacts of the onshore elements, in particular the onshore substation, responding to adjacent land uses and the existing character of the area; to retain green infrastructure assets wherever possible; to integrate with and expand the existing green infrastructure network within and around the onshore substation; and to enhance, restore and reintroduce characteristic landscape elements which have been lost or degraded, where practicable.</p>
RR-014.5	There is a cumulative impact of various interventions related to the National Grid connection point at Bodelwyddan which	The cumulative impact of other projects, including those proposed around the existing Bodelwyddan National Grid Substation has been considered in section

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Reference	Relevant Representation Comment	Applicant's response
	needs to be considered and would benefit from strategic coordination.	<p>6.14 of Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement (APP-069).</p> <p>Throughout the development of the Application, the Applicant has sought to engage with Denbighshire County Council to seek landscape input through the Onshore Ecology and Landscape Expert Working Group and has sought to put in place measures discussed in that Working Group to achieve an integrated landscape proposal. The Applicant's position is that this has been achieved.</p> <p>The cumulative effects assessment (CEA) throughout all chapters within Volume 3 has considered the Mona Offshore Wind Project, alongside the information available with respect to the National Grid Bodelwyddan substation extension proposal. The CEA has been undertaken on the basis of the latest available information in the public domain, which is the Autumn 2023 consultation material. It is understood that the application for the proposal is imminent. If further information is available for the proposal before the decision on the Mona Offshore Wind Project, the Applicant will provide an update to the cumulative assessment, presented within those relevant chapters within Volume 3.</p>
RR-014.6	<p><u>Consultation to Date</u></p> <p>This is the first Design Review with the Design Commission for Wales.</p>	<p>The Applicant welcomes the review and report from the Design Commission for Wales. The Design Commission for Wales has subsequently been invited to the Onshore Ecology and Landscape Expert Working Group meetings, and the Applicant looks forward to continuing to work with the Design Commission for Wales.</p>
RR-014.7	<p><u>The Proposal</u></p> <p>The Mona Offshore Wind Project is an offshore energy generating station and, for consenting purposes, is categorised as a Nationally Significant Infrastructure Project (NSIP). At the current stage of development, the Mona Array Area (i.e. the area within which up to 107 offshore wind turbines will be located) is 449.97km<sup>2</sup> in area and is located 28.2km (15.2nm) from the Ynys Môn (Anglesey) coastline. The key components of the Mona Offshore Wind Project include:</p> <ul style="list-style-type: none"> <li>• Offshore wind turbines</li> <li>• Foundations (for wind turbines and Offshore Substation Platforms (OPSs))</li> <li>• Scour protection</li> </ul>	<p>While the key components of the Mona Offshore Wind Project outlined in the Design Review Report remain the same, following the Design Review in August 2023 a number of project parameters were refined further. For example, the maximum number of turbines was reduced from 107 to 96, optionality was removed from the onshore cable route and the height and footprint of the onshore substation was reduced in response to consultation feedback received during Section 42 consultation. A list of project developments between Section 42 consultation and application are contained within Section 4.12 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). Full details of the final proposals for which Development Consent is sought are presented in Volume 1, Chapter 3: Project Description of the Environmental Statement (APP-050).</p>

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Reference	Relevant Representation Comment	Applicant's response
	<ul style="list-style-type: none"> <li>• Inter-array cables linking the individual wind turbines to the OPSs</li> <li>• Connection works to the existing Bodelwyddan National Grid substation</li> <li>• Temporary construction compounds, including storage areas</li> <li>• Permanent and temporary access roads</li> </ul> <p>High Voltage Alternating Current (HVAC) transmission system including: - OPSs, Offshore interconnector cable(s), Offshore export cable(s), Mona 400kv Grid Connection cable, Onshore export cable(s), Onshore Substation</p>	
RR-014.8	<p><u>Context</u></p> <p>The onshore export cables and onshore substation will be located within the Mona Proposed Onshore Development Area, which overlaps Conwy and Denbighshire, in north Wales. Connection will be made with the Bodelwyddan National Grid Substation to the west of St Asaph. The proposed location of the substation was selected in the days prior to this design review and is identified as Option 2 in the pre-review material. This is located to the south of the National Grid Substation, south of St Asaph Business Park. Several other substations are located or proposed in this area relating to other offshore wind farms that also plan to connect to the grid at this point.</p>	<p>This is noted by the Applicant, who agrees with the description of the context of the Mona Offshore Wind Project presented in the Design Review Report.</p>
RR-014.9	<p><b>Main Points</b></p> <p><u>Design Principles</u></p> <p>The design process presented was largely driven by constraints and the assessment process whereas the discussion in the review revealed a potentially more ambitious approach that seeks to better understand and then enhance the landscape. This needs to be documented, presented and communicated as part of a narrative for the scheme and, crucially, embedded into firm commitments for the project. To inform this approach, a more qualitative analysis of the existing landscape context needs to be</p>	<p>The Design Principles (APP-189) were developed post-PEIR following the Design Review with DCfW and recommendations to develop a narrative for the development of how to embed the onshore substation into the existing landscape, and potentially to also enhance it. The Design Principles present the commitments made by the Applicant with regard to design principles. This includes a section on the context of the onshore substation site which has been used to develop the design principles (section 2 of APP-189).</p> <p>The commitments made within the Design Principles in relation to the onshore substation have been informed by, and are sensitive to, the impact assessment undertaken within the Environmental Statement, in particular in relation to Volume</p>

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Reference	Relevant Representation Comment	Applicant's response
	developed and fed into a clearly presented vision. This analysis should include consideration of the history of the area, landscape character and functions, natural vs manmade interventions, noise, views etc.	3, Chapter 3: Onshore Ecology (APP-066) and Volume 3, Chapter 6: Landscape and Visual Resources (APP-069), and the mitigations proposed within.
RR-014.10	Further work is needed to inform the proposals and present a coherent approach to design which is clearly discernible amongst the myriad of other material that accompanies a consent application of this scale. This work should include definition of high-level design principles that are guiding work across the whole project, that can then lead to sub-sets of more detailed principles or design commitments specific to individual elements of the work or individual sites, enabling appropriate responses to local context.	
RR-014.11	<p><u>Design Development</u></p> <p>Once identified, those design principles should inform design considerations at all levels.</p>	To secure the principles set out in the Design Principles (APP-189) a Design Guide will be developed by the Applicant post-consent that will follow the principles set out in the Design Principles. The Design Guide will inform the final detailed design that is submitted to the relevant authorities for the discharge of relevant DCO Requirements. Further details are available in section 4 of the Design Principles (APP-189).
RR-014.12	The approach to minimal impact and restoration along the route of the cable seems to be the right approach and we support avoiding significant mature trees and tunnelling under mature hedgerows. Consideration should still be given to any 'gaps' the proposals may leave in existing vegetation in the longer term due to over planting restrictions on such cable corridors.	<p>This is noted and welcomed by the Applicant.</p> <p>The Applicant can confirm that along the export cable corridor all hedgerows that require removal for the purposes of onshore export cable installation will be re-planted following completion of construction, as confirmed in the Outline Onshore Construction Method Statement (APP-227).</p>
RR-014.13	There is much more scope for creative intervention at the substation site. Early indicative 3D visuals of the sub-station site are helpful to begin a discussion about the design and provide a much more informative idea of the scale and potential visual impact of the facility than a parameters plan/box which, visually, is highly misleading and unhelpful in engagement with stakeholders and the community. It is always helpful to show the site in context including orientation, access and surrounding landscape features. Aspects to consider at this stage include the shape of the	<p>The Applicant notes the comments regarding illustrating the potential design of the onshore substation.</p> <p>3D visualisations of the onshore substation are included within the Application in the photomontages created for the assessment of landscape and visual resources. These are included within Volume 7, Annex 6.5: Landscape Visualisations (Parts 1-3) (APP-157, APP-158 and APP-159). This demonstrates the site context including orientation, access and surrounding landscape features.</p> <p>An Outline Landscape and Environmental Management Plan (APP-208) has been produced that considers the outline for the onshore substation and how it relates to</p>



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Reference	Relevant Representation Comment	Applicant's response
	operational site and how it relates to existing field boundaries, boundary treatments, approach to the design of any internal buildings, lighting, positive integration of SuDS requirements, land surface treatment and whether this is overlooked from higher land, access, potential for arts contributions. Each of these should be informed by the design principles.	existing boundaries, integration of the SuDS requirements and ecological mitigation including woodland planting and habitat enhancement.  The Design Principles (APP-189) presents the guiding principles made by the Applicant regarding design such as relating to internal buildings and lighting. This includes a section on the context of the onshore substation site which has been used to develop the design principles (section 2 of APP-189).
RR-014.14	For the purposes of future community engagement, it would be helpful to be clear about what decisions and designs are fixed and what can be influenced at any consultation stage.	To secure the principles set out in the Design Principles (APP-189) a Design Guide will be developed by the Applicant post-consent that will follow the principles set out in the Design Principles. The Design Guide will inform the final detailed design that is submitted to the relevant authorities for the discharge of relevant DCO Requirements.  The Applicant will engage with consultees including Denbighshire County Council and the Design Commission for Wales on the emerging design to inform the development of the design guide.
RR-014.15	<p><u>Strategic Coordination</u></p> <p>The proposed substation at Bodelwyddan is one of several that have been or will be located in this area but there has been no apparent strategic planning around how all of these significant interventions will work together. Consequently, the area is developing in a piecemeal way and, understandably, the local community is cautious about the overall impact. Some creative thinking is needed in relation to what sort of place this will be. It is divorced from both the source of the energy generation and its point of use and yet the area is being heavily influenced by energy infrastructure. A creative interpretation of what this means for the area and how this could influence the landscape and west St Asaph as a place would help to inform the design of each of the substations and other energy related development. A landscape-led 'masterplanning' approach to the area would be helpful and could help to define important aspects of the immediate area and the adjacent business park (such as key views to/from) and the surrounding landscape and how each of the new interventions can fit into this. It might also consider how local communities can best engage with and</p>	<p>The ultimate decision for the connection point for the Mona Offshore Wind Project was determined by National Grid Electricity System Operator (NGESO). Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project by NG 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.</p> <p>Throughout the development of the Application, the Applicant has sought to engaged with Denbighshire County Council to seek landscape input through the Onshore Ecology and Landscape Expert Working Group and has sought to put in place measures discussed in that Working Group to achieve an integrated landscape proposal. The Applicant' considers this has been achieved.</p> <p>The cumulative affects assessment (CEA) throughout all chapters within Volume 3 has considered the Mona Offshore Wind Project, alongside the National Grid Bodelwyddan substation extension proposal. The CEA has been undertaken on the basis of the latest available information in the public domain, which is the Autumn 2023 consultation material. It is understood that the application for the proposal is imminent. If further information is available for the proposal before the decision on the Mona Offshore Wind Project the Applicant will provide an update</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>understand such infrastructure and its wider purpose and benefits. Such an approach might well also consider any collective community, landscape, ecological or other benefits, facilities or initiatives to improve the immediate area that could be supported by the multiple proposals.</p>	<p>to the cumulative assessment, presented within those relevant chapters within Volume 3.</p>
RR-014.16	<p>Consideration should be given to how best to use contributions from any planning performance agreements to contribute to some of this strategic thinking whilst also ensuring partiality. DCFW would welcome further engagement in this and can potentially offer a facilitation role in future workshop discussions.</p> <p>A piece of more strategic work could also help to inform some general design principles and design guidance for the area, potentially in the form of an SPG document or similar. It is recognised that with increasing demand for electrical energy, substantial new and expanded National Grid infrastructure and supplier substations are inevitable across Wales, therefore similar strategic work is needed at a national level.</p>	<p>The Applicant has engaged with Denbighshire County Council (DCC) and is currently in discussions regarding agreeing a planning performance agreement (or alternative form of agreement).</p> <p>The DCfW recommend a “landscape-led ‘masterplanning’ approach to the area” and the Applicant believes this would be for DCC to develop rather than something that can be led by the Applicant.</p>
RR-014.17	<p><u>Next Steps</u></p> <p>A rigorous process has been undertaken but it is now time to look back and ensure that a design approach that reflects the stated ambitions of the project has been undertaken and can be presented clearly.</p> <p>The Design Commission would welcome a further Design Review at which we would like to see the design principles refined and presented, and a demonstration of how these are informing the design of the substation and any incorporated mitigation and enhancement, on and off site.</p>	<p>The high-level design principles have been developed following the Design Review, and following consultation with the Onshore Ecology and Landscape Expert Working Group and are presented in the Design Principles (APP-189). The Applicant has engaged with the Design Commission of Wales on the emerging design (section 4.1 of the Design Principles (APP-189)).</p> <p>To secure the principles set out in the Design Principles (APP-189) a Design Guide will be developed by the Applicant post-consent that will follow and refine the principles set out in the Design Principles. The Design Guide will inform the final detailed design that is submitted to the relevant authorities for the discharge of relevant DCO Requirements.</p>

## 2.15 DMPC

Table 2.15: RR-015 – DMPC

Reference	Relevant Representation Comment	Applicant's response
RR-015.1	<p>In capacity of agent for our clients (being in respect of Owners / Occupiers of land proposed to be affected by the intended scheme ) I anticipate the potential need to submit representations on ,for instance -:</p> <ul style="list-style-type: none"> <li>• The draft Development Consent Order</li> <li>• The Book of Reference</li> <li>• The Outline landscape &amp; Ecology Management Plan</li> <li>• The Outline Construction Fencing Plan</li> <li>• Outline Soil Management Plan</li> <li>• The Tree &amp; Hedgerow Plan</li> <li>• The Published Soils &amp; Agricultural Land classification Data Technical Report</li> <li>• The Outline Biosecurity Protocol</li> <li>• Matters applying to construction /installation of cables and ancillary apparatus.</li> <li>• Mitigating damage and land reinstatement methodology.</li> </ul>	<p>The Applicant notes the representation and will continue to engage with DMPC and their clients on those items set out in the representation through the course of the examination and through negotiations of the heads of terms and associated option agreements.</p>

## 2.16 Dr Jonathan F Dean

Table 2.16: RR-016 – Dr Jonathan F Dean

Reference	Relevant Representation Comment	Applicant's response
RR-016.1	<p>I strongly support this application Wales can easily reach net zero from offshore wind alone and it is critical for the Welsh countryside that this project proceeds as quickly as practicable. The more offshore wind we have the less onshore wind we need, so this project will actively help preserve Welsh landscapes for future generations.</p>	<p>The Applicant notes the response of support and is committed to the project's delivery.</p> <p>The UK's ambition is to lead the world in combatting climate change, reducing reliance on fossil fuels and embracing a future where renewable energy powers homes and businesses. At the centre of this drive is a commitment to reducing UK greenhouse gas emissions and reaching net zero by 2050. The UK government has an ambition to generate 50 GW of clean, renewable energy from offshore wind by 2030. Figures released by the Department for Business and Trade in 2023 show that the UK currently has 13.9 GW of installed offshore wind capacity (Department for Business and Trade, 2023). The Mona Offshore Wind Project therefore, has a critical role to play – both in helping the UK to achieve its net zero ambitions and, specifically, in reaching offshore wind generation goals. Further detail on this is provided in Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (APP-049).</p>

## 2.17 Elizabeth W Wade

**Table 2.17: RR-017 – Elizabeth W Wade**

Reference	Relevant Representation Comment	Applicant's response
RR-017.1	I am one of the owners of plots 06-101, 06-102, 06-103, 06-104, 06-105 and wish to object to the proposed cable route on the following non exhaustive grounds: The Promoter has failed to consider all reasonable options for power transmittal methods – Evidence will be adduced at Inquiry for this.	<p>The Applicant has undertaken a rigorous and robust site selection process in relation to the onshore cable route for the Mona Offshore Wind Project.</p> <p>A full reasoning and justification for the selection of the onshore cable route is provided in Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). This is also supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p>
RR-017.2	The Promoter has failed to consider all reasonable route options that would score equally well in its BRAG report – Evidence will be adduced at Inquiry for this.	<p>The optimum route for an onshore grid connection is generally considered to be the shortest route from A to B from landfall to Bodelwyddan National Grid Substation. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore cable route.</p>
RR-017.3	The Promoter has failed to consider a combination of different power transmittal methods and reasonable route options that would score equally well in its BRAG report – Evidence will be adduced at Inquiry for this.	<p>Decisions made by the Applicant in response to landowner and consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible.</p> <p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons. This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
RR-017.4	The current power transmittal proposals will not cater for the full generation capacity of Mona Offshore Windfarm leading to a bottleneck in the power supply. This also curtails the capacity for future upgrades. This would not be the case in the event of different transmittal methods and better route	<p>The Applicant can confirm that the base case design constitutes 4 circuits of 220kv cables, with each circuit having the transmittal capacity of circa 375MW. These details are confirmed in Section 3.7.2 of Volume 1, Chapter 3: Project Description (APP-050). On this basis, there will be sufficient transmittal capacity for the Mona Offshore Wind Project.</p>

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Reference	Relevant Representation Comment	Applicant's response
	selection or a combination of both – Evidence will be adduced at Inquiry for this.	Please see the above Relevant Representation Responses (RR-017.1-3) regarding Site Selection & Consideration of Alternatives and Engineering Feasibility Assessment aspects for the detailed responses.
RR-017.5	Locally the land take is extremely excessive and this could be significantly reduced by different transmittal methods and better route selection or a combination of both – Evidence will be adduced at Inquiry for this.	<p>The Applicant has undertaken a rigorous and robust site selection process in relation to the onshore cable route for the Mona Offshore Wind Project.</p> <p>A full reasoning and justification for the selection of the onshore cable route is provided in Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). This is also supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p> <p>The optimum route for an onshore grid connection is generally considered to be the shortest route from A to B from landfall to Bodelwyddan National Grid Substation. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore cable route.</p> <p>Decisions made by the Applicant in response to consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible.</p> <p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons. This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
RR-017.6	The land has special value to us and future proposals over other land locally and cannot be replaced – Evidence will be adduced at Inquiry for this.	The principle point of land value is not a matter for the examination and will be addressed through negotiations. However, the point is noted and the Applicant looks forward to receiving evidence testing to the value suggested through voluntary negotiations.
RR-017.7	Requests to consider alternative arrangements have been brushed aside with little or no consideration by the Promoter.	Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and

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Reference	Relevant Representation Comment	Applicant's response
	<p>There is little or no regard for the impacts on us which is very unfair – Evidence will be adduced at Inquiry for this.</p>	<p>geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons. This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p> <p>In addition to the strategic-level decision making, a preliminary Engineering feasibility assessment undertaken to define the scope of the Mona Offshore Wind Project stipulated that underground cables are less affected by weather conditions, offer higher reliability and security than overhead cables, are less prone to interference from external factors, reduce the risk of electrocution or injury to people or animals, are less prone to explosion or fire, and are easier to maintain.</p> <p>The Applicant carried out a statutory consultation in 2023; this is a key part of the planning process, which the Applicant undertook in order to understand community views. The Applicant submitted a Consultation Report (APP-037) with its DCO application that explained 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.</p> <p>The Applicant will continue to engage with Elizabeth Wade throughout the Examination process and is keen to understand any further information that can be provided.</p>
<p>RR-017.8</p>	<p>The scheme, certainly to the extent that our land is concerned, has been designed for the convenience of the Promoter and also minimising their costs in order to maximise their return on investment rather than on the basis of there being a compelling case in the public interest overriding the harm done to us as the impacted landowners – Evidence will be adduced at Inquiry for this.</p>	<p>The land take proposed for the scheme is proportionate to the works required and applicant will seek to minimise land take through construction where possible. Heads of terms which include consideration for the rights sought and disturbance caused have been issued and are being negotiated.</p> <p>The Statement of Reasons (APP-029) sets out the Applicant's justification for seeking powers of compulsory acquisition, and that a compelling case exists in the public interest which justifies the making of the DCO with those powers.</p>
<p>RR-017.9</p>	<p>In addition to consultation failings and lack of any meaningful sincere engagement beyond the minimum necessary lip service believed to be necessary to secure these draconian CPO powers, the Promoter has sought to discourage and disincentivise proper debate at Public Inquiry by declining to produce hard copies of the documents to statutory objectors. As can be seen from the DCO notice received on 26 March 2024 they will charge up</p>	<p>The Applicant is a responsible developer committed to listening to the views of stakeholders including landowners and members of the local community. Statutory consultation is a key part of the planning process, one which the applicant took seriously; a Consultation Report was submitted with the DCO application (APP-037) explaining how the Applicant complied with the pre-application consultation requirements set down in the Planning Act 2008 and had regard to all the feedback submitted.</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>to £7,000 to provide hard copies of their reports and documents. One of the co-owners, my mother is in their late 80's unable to drive and with vision difficulties and unable to read a computer screen and yet the Promoter expects her to travel to either Llandudno or Rhyl in order to inspect hard copies of the document as the Promoter's charges for them are simply prohibitive.</p>	<p>From the outset, the Applicant promoted a digital-first consultation and designed a project website that is easily accessible to a wide range of users. That said, the Applicant consulted using a variety of methods to help explain the proposals and encourage people to provide their comments. Community focused materials included a consultation postcard, website, brochure and a non-technical summary of the PEIR (PEIR NTS). The Applicant also organised a series of consultation events, located at accessible public locations, where a full copy of the PEIR was available for reference, as well as large scale maps with further details on the locations for attendees to view and discuss. Project 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.</p> <p>When the Applicant's application for a DCO was accepted the digital-first approach continued, with all documents available on the project's pages on the National Infrastructure Planning website. With the volume of the full suite of documents in the many thousands of pages, the Applicant's Section 56 notification offered assistance to anyone with accessing the documents relevant to them: "If you require an alternative method for inspection of the DCO application or have any queries, including how to access the documents on the Planning Inspectorate's website, please call the Applicant on 0800 860 6263 or email <a href="mailto:info@monaoffshorewind.com">info@monaoffshorewind.com</a>."</p> <p>Again, due to the volume of the full suite of documents, and with particular reference to the Applicant's commitment to the environment and sustainability, it was deemed reasonable to charge a fee for printed materials: "The Applicant can also provide any of the documents as required on a USB (free of charge). Hard copies of the NTS can also be provided upon reasonable request. Provision of hard copies of the ES will be subject to a maximum charge of £7,000, plus VAT, to cover printing and delivery costs." The Applicant considers its commitments to aiding people with the use of resources to be more than reasonable.</p> <p>The Applicant received requests for printed copies of all DCO application documents from the representative of the four named respondents. Following a discussion with said representative about the volume of documents that makes up the DCO application, the Applicant offered a view on which documents it thought would be of most relevance (works plans, land plans, statement of reasons and site selection BRAG) and offered to send hard copies of these free of charge.</p> <p>The representative responded stating this "may be a sensible compromise" and requested that the Applicant initially forward a link to the pdf of the statement of</p>



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Reference	Relevant Representation Comment	Applicant's response
		reasons and a list of all the documents in the document library in pdf format for consideration. These links were shared, and at time of writing, no further response had been received.
RR-017.10	In addition to the above summary please see formal letter of objection dated 3rd May 2024 submitted by post and email to the planning inspectorate and National Infrastructure Commission. We look forward to explaining the above issues in detail to the inspector at the Inquiry	This is noted by the Applicant. The Applicant welcomes discussion on detailed points through negotiations of the heads of terms.
RR-017.11	Dear Sirs We have been notified that MONA OFFSHORE WIND LTD ("Promoter") has made the above application for Compulsory Purchase Powers and we wish to object to the confirmation of this order as submitted on the following non exhaustive grounds:	This is noted by the Applicant and heads of terms for a voluntary agreement have been issued and we look forward to progressing negotiations of those.
RR-017.12	<p>1.0 Introduction and background</p> <p>1.1 We are Harriett Mary Parry, Robert Wynne Parry, Griffith Wayne Parry, and Elizabeth Wynne Wade ("Objectors") being the joint owners of land ("Property") affected by this Development Consent Order ("DCO").</p> <p>1.2 The Property is identified as Plots 06-101, 06-102, 06-103, 06-104c, 06-105 in the Book of Reference and on the Mona Land Plan.</p> <p>1.3 In line with current government policy although entirely for private profit, the Promoter is proposing to construct scheme to build an offshore wind farm comprising of up to 96 wind turbines within an area of circa 300 square KM offshore from Abergele in North Wales.</p> <p>1.4 Whilst estimates vary according to source and the dates, the Promoter claims that the scheme will generate up to 1.5 Gigawatts of electrical power and this power is intended to be transmitted from its point of landfall between Llandulas and Abergele and then by underground cables to a substation at Bodelwyddan behind St Asaph Business Park.</p> <p>1.5 Notwithstanding that this is a scheme for private commercial profit, the Promoter has sought to use statutory</p>	The Applicant notes the points raised.

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Reference	Relevant Representation Comment	Applicant's response
	<p>public DCO powers under Section 56 of the Planning Act 2008 to assemble the land that it considers necessary to accommodate its scheme.</p> <p>1.6 The relevant notification of making of the CPO issued by the Acquiring Authority and received by the Objectors is dated 26th March and specifies that Objections must be made 'by 6th May 2024'.</p> <p>1.7 The Objectors are a "qualifying person" within the meaning of s.12(2) of the Acquisition of Land Act 1981 and are therefore statutory objectors.</p> <p>1.8 The Objectors are also "Affected Persons" for the purposes of Section 59 and 92 of the Planning Act 2008.</p> <p>1.9 Whilst the Objectors' points of objection are the same and hence are recorded in this single letter of objection, there are in fact 4 separate individual parties objecting here and they should be treated individually as Objectors in their own right.</p>	
RR-017.13	<p>1.10 Section 122 of the Planning Act 2008 states:-            "122 Purpose for which compulsory acquisition may be authorised</p> <p>(1) An order granting development consent may include provision authorising the compulsory acquisition of land only if the [F1 Secretary of State] is satisfied that the conditions in subsections (2) and (3) are met.</p> <p>(2) The condition is that the land -</p> <p>(a) is required for the development to which the development consent relates,</p> <p>(b) is required to facilitate or is incidental to that development, or</p> <p>(c) is replacement land which is to be given in exchanged for the order land under section 131 or 132.</p> <p>(3) The condition is that there is a compelling case in the public interest for the land to be acquired compulsorily."            (emphasis added)</p>	<p>This is noted and welcomed by the Applicant.</p> <p>The Applicant can confirm that the Mona Offshore Wind Project understands the requirements for which compulsory acquisition may be authorised.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-017.14	<p>1.11 Lord Justice McGowan noted in Sharkey V Buckinghamshire District Council that "required" in 2) a) of Section 122 of the Planning Act 2008 does not mean that the land in question has to be "indispensable" however it does not mean that the land is merely "desirable" or "convenient" for the purposes of the scheme either.</p> <p>1.12 It should be further noted that confirmation of the Order also depends on meeting the test that there is a compelling case in the public interest for the land to be acquired compulsorily in Section 3) of the 122 of the Planning Act 2008.</p> <p>1.13 Section 13 of the "Guidance on Compulsory purchase process and The Crichel Down Rules" produced by the Department for Levelling Up, Housing and Communities July 2019 states:"13. How will the confirming minister consider the acquiring authority's justification for a compulsory purchase order? The minister confirming the order has to be able to take a balanced view between the intentions of the acquiring authority and the concerns of those with an interest in the land that it is proposing to acquire compulsorily and the wider public interest. (emphasis added) Section 18 of the Memorandum to Circular 06/04 ends with :..... Parliament has always taken the view that land should only be taken compulsorily where there is clear evidence that the public benefit will outweigh the private loss. The Human Rights Act reinforces that basic requirement. (emphasis added)</p>	<p>This is noted and welcomed by the Applicant.</p> <p>The Applicant can confirm that the Mona Offshore Wind Project understands the requirements for which compulsory acquisition may be authorised.</p>
RR-017.15	<p>1.14 Evidence will be adduced to demonstrate that much of the design of the scheme, certainly to the extent that it impacts on landowners and certainly the Objectors and the Property, has been developed for general and commercial convenience to the Promoter and infurtherance of its private profit rather than from the view that there is a compelling case in the public interest that outweighs the harm done. In its commercial pursuit, the Promoter has failed to take proper account of representations from the Objectors which is unfair.</p>	<p>The Applicant has undertaken a rigorous and robust site selection process in relation to the onshore cable route for the Mona Offshore Wind Project.</p> <p>A full reasoning and justification for the selection of the onshore cable route is provided in Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). This is also supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p> <p>The optimum route for an onshore grid connection is generally considered to be the shortest route from A to B from landfall to Bodelwyddan National Grid</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-017.16	<p>1.15 In addition to the above the Objectors wish to object to the Order on the following non exhaustive grounds:</p> <p>2.0 The Onshore Power Transmittal Route Generally</p> <p>2.1 The applicant has not demonstrated that the route proposed is the most appropriate route for the scheme. The Power Transmittal Route seeks to terminate at a substation at Bodelwyddan which, as the crow flies, is some 10KM from where the cable breaks land. The route selection report purports to have carried out a Brown Red Amber Green ("BRAG") report to show that the 14.75KM route selected is optimum. However at least 4 alternative routes have been identified and evidence will be adduced to demonstrate how they are at least equivalent to and often superior to the selected route in terms of the BRAG report and general common sense.</p>	<p>Substation. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore cable route.</p> <p>Decisions made by the Applicant in response to consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible.</p> <p>The Statement of Reasons (APP-029) sets out the Applicant's justification for seeking powers of compulsory acquisition, and that a compelling case exists in the public interest which justifies the making of the DCO with those powers.</p>
RR-017.17	<p>3.0 General Disruption During Construction</p> <p>3.1 The implementation of the scheme on shore will be extremely disruptive both on private land and to the wider public for instance by it causing widespread disruption to traffic flows and the public highway generally and thereby to statutory and essential services to locals and visitors including tourists. This will be to the detriment of local, businesses, residents and visitors alike. It is also likely to cause noise, dust, vibration, fumes and other disturbances generally which are a concern. The Promoter has failed to evidence that these have been given proper consideration when developing its scheme.</p>	<p>The Applicant has considered potential impacts associated with traffic and transport, noise and vibration, air quality and socio-economics as part of the project development and has assessed each topic in the Environmental Statement.</p> <p>Potential impacts associated with widespread disruption to traffic flows and the public highway generally are considered within Volume 3, Chapter 8: Traffic and Transport (APP-071). No significant adverse impacts are identified during the construction phase.</p> <p>Potential impacts associated with noise and vibration are considered within Volume 3, Chapter 9: Noise and Vibration (APP-072). No significant adverse impacts are identified during the construction phase.</p> <p>Potential impacts associated with dust and fumes are considered within Volume 3, Chapter 10: Air Quality (APP-073). No significant adverse impacts are identified during the construction phase.</p> <p>Potential impacts associated with widespread disruption to locals and visitors including tourists are considered within Volume 4, Chapter 3: Socio-economics (APP-077). No significant adverse impacts are identified during the construction phase.</p>
RR-017.18	<p>4.0 The Onshore Power Transmittal Methodology</p> <p>4.1 Pylons</p>	<p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>4.1.1 The Promoter has dismissed pylons as a means of power transmittal simply on the grounds of "aesthetics" without adequate or indeed any consideration of other factors and advantages. Neither has the Promoter considered the use of existing pylons already in situ. The Promoter has also failed to consider a proposal whereby power transmittal could be partly by pylon and partly by underground cable. Evidence will be adduced to demonstrate how adopting a more open minded approach to these methodologies achieves a considerably better solution for all parties, including the Promoter, rather than the one currently proposed which is instead driven by Promoter convenience and maximizing rates of return.</p>	<p>considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
<p>RR-017.19</p>	<p>Underground Cables</p> <p>4.2.1 The Promoter's preference is for underground cables through previously undisturbed virgin lands largely within Conwy Council's "Special Landscaped Area".</p>	<p>The Applicant notes the concern regarding the locally designated Special Landscape Areas (SLAs). An assessment of effects on the special characteristics of the local landscape designations – Rhyd y Foel to Abergele SLA and Elwy and Aled Valleys SLAs – is contained within Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p> <p>The potential impact is assessed as a moderate adverse effect, which is considered not significant in EIA terms.</p>
<p>RR-017.20</p>	<p>4.2.2 However, due to issues with cables heating then the Promoter is limited in the capacity of cable that can be deployed underground thereby necessitating 4 cables which, the Objector is told will sterilize a 30Metre strip of their Property. Cables on pylons are open to the environment and the benefits of air cooling and so can carry a much higher capacity and so less cables and consequently, less easement width would be needed. The scale of the powers sought therefore go beyond that which is reasonably required to achieve the implementation of the Scheme.</p>	<p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
<p>RR-017.21</p>	<p>4.2.3 The Promoter claims that 1.5Gigawatts of electricity will be generated and this will require a transmittal cable capacity of 1.5MVA. They advise that this will be accommodated in 4 cables with considerable distances between them so that a large area of 30 metres in width is required for an easement and is land which will be sterilized by the scheme. However, the Statement of Reasons advises</p>	<p>Please see above Relevant Representation Response regarding the Mona Offshore Wind Project Transmittal Capacity (RR-017.4), Site Selection &amp; Consideration of Alternatives and Engineering Feasibility Assessment (RR-017.1-3) aspects for the detailed responses.</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>that a capacity of only up to 225- 275KVA will be provided for each of the 4 cables thereby only giving transmittal power of 1 M KVA or 1 GigaWatt. Underground cabling will therefore be a bottleneck in the amount of power that the current scheme can produce as well as stymie future upgrades which could easily be overcome had the Promoter considered an above ground pylon scheme.</p>	
RR-017.22	<p>4.2.4 Evidence will be adduced that effective alternative arrangements could be installed with the cables that can assist with for instance, venting and cooling, but other issues as well and increase the capacity of the cable runs that are there and again reduce the need for this excessive width of easement and consequent and unnecessary sterilization of the land.</p>	<p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons. This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
RR-017.23	<p>5.0 The Onshore Route Selection Locally and Impact on Objector</p> <p>5.1 Locally the cable travels from a North Westerly direction towards the A548 but crosses the B5381 into plot 06-100 in a gradual sweeping arc over the A548 and into the objector's land. Unnecessarily, the entirety of the Objector's frontage to the A548 (almost 290 meters) is within the Limits of Deviation and a similar amount to the frontage of plot 06-100. The cables splay out to take this 90 degree bend as slowly and gradually as they possibly can. However this is not a water or sewerage pipe or high pressure hydrocarbon or gas or some other hazardous liquid transmitted under pressure necessitating a gradual circumference. It is understood that electricity is quite able to endure sharp 90 degree turns and bends which would greatly lessen the impact in terms of amount of land affected on the objector's plots as well as on the neighbouring plots 06-100. A request to look into and amend this issue has been ignored by the promoter.</p>	<p>The Applicant has considered a number of factors when proposing the alignment (and therefore the potential land take) of the onshore cable route, as detailed in Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p> <p>The alignment of the proposed onshore cable route, where it passes under the A548 near the Objector's land, is not dictated by the cable design but by several other factors. The primary factor being the proposed trenchless crossing approach for road and utility crossings adopted by the Mona Offshore Wind Project. Trenchless drilling allows the Applicant to place a conduit under the roads in which a cable is then installed, without having to close them or place any constraint on the traffic flows during their installation. Trenchless drilling techniques have limits on the minimum radius that conduits can be installed and are constrained by ground conditions, conduit sizing and materials, and restrictions placed by third parties. As the power cables also have to be pulled into the conduit, the pulling tensions on the cables also need to be considered, so although cables can be laid to reasonably tight radii, they cannot be pulled through conduits with the same radii without putting excessive tension on the cables and causing damage.</p> <p>It is not the cable design that dictates the onshore cable route alignment across the A548 but the engineering design along with land and consent-based constraints.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-017.24	<p>5.2 The Objectors land has a special value to them arising from the unique potential not present or available to the parcels on the other 3 quadrants of Pen Yr Efail Crossroads.</p> <p>In an attempt to preserve that position a request was made that the Promoter positioned the cables so that they travelled slightly further to the south along plot 06-100 (the owner of which is understood to be in advanced discussions with the Promoter towards accepting the cables) and crossed to the south of Property and to the south of the pylons already in place there before resuming the route to the far south of the Objector's Property beyond the land already sterilised by the existing pylons. The response obtained on 11 /09/23 via the Promoter's agent's was: "that to go to the south of the line, we would need to cross an additional road and then be running parallel between the pylon route in your land and the one just to the south, which again would be very limiting." This demonstrates how the Promoter is aware of alternative arrangements but has not been prepared to consider them preferring to dismiss them out of hand merely due to their being slightly more commodious to itself. It has instead selected the Objector's property for convenience as well as commercial reasons rather than for compelling reasons in the public interest which outweigh the loss suffered by the affected party to whom no regard has been given.</p>	<p>The principle point of land value is not a matter for the Examination and will be addressed through direct negotiations. However, the point is noted, and the Applicant looks forward to receiving evidence testing to the value suggested through voluntary negotiations.</p> <p>As detailed in Response to Relevant Representation RR-017.23 "The Applicant has considered a number of factors when proposing the alignment (and therefore the potential land take) of the onshore cable route, as detailed in Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082)". Engineering constraints based on moving the route to the south of the northern set of pylons include:</p> <ul style="list-style-type: none"> <li>• Additional land requirements to the west of the A548 to accommodate the trenchless technique under the road. Moving the crossing point south also makes the angle for crossing the road more acute which will reduce engineering feasibility of the trenchless technique at this location and also increases the pulling tension on the cables due to a tighter horizontal radius which increases the risk of damaging cables during installation.</li> <li>• Moving the proposed Order Limits south at the crossroad would create road safety issues off the A548 into the compound due to the road alignment and the junction to the south.</li> <li>• From an electrical perspective, running the cable circuits between two parallel overhead lines is not advisable due to the potential of induced currents. The Applicant is also limited by the working areas for both lines identified in the protective provisions, so the net corridor width is not sufficient for construction purposes.</li> <li>• The design philosophy and industry practice are to cross exiting utilities at a perpendicular angle, the alignment chosen enables the Applicant to do this. If The Objectors proposed route was utilised, between the pylons there are additional existing utilities that would either have to be crossed at an acute angle or diverted to facilitate our works.</li> </ul> <p>If it has not been possible to avoid or reduce the impact on a particular landowner, then this has been because of the requirements for Engineering feasibility or to avoid potential impacts associated with environmental constraints, as demonstrated above.</p>
RR-017.25	<p>5.3 Insufficient evidence has been provided to demonstrate that this project will secure the most efficient and effective use of the Property which is unique in planning and amenity</p>	<p>The Applicant disagrees that insufficient evidence has been provided. A full explanation of the site selection and consideration of alternatives process is detailed within Volume 1, Chapter 4: Site Selection and Consideration of</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>terms enabling it to be deployed for a number of alternative options and uses not available to adjacent and neighbouring land. This will be to the detriment of the local community and economy.</p>	<p>Alternatives (APP-051). The Applicant will continue to work with the landowner regarding potential opportunities associated with the Property and looks forward to receiving evidence testing to the value suggested through voluntary negotiations.</p>
RR-017.26	<p>5.4 The Order, if confirmed, will sterilize not only the excessive route of the cable but also render the retained land sterile by virtue of the fact that it will be unfeasible to develop in isolation. This would not be the case if the transmittal route or methodology selected was different or in fact that requested small local changes had been taken seriously and accommodated.</p>	<p>The Applicant has sought to micro site the route where possible to accommodate landowner requests and has considered a number of factors when proposing the alignment (and therefore the potential land take) of the onshore cable route, as detailed within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051).</p> <p>However, due to several environmental constraints as listed above in the detailed response to RR-017.24, the following points can also be noted:</p> <ul style="list-style-type: none"> <li>• There are additional land requirements at the crossing to facilitate the trenchless technique design and to accommodate the proposed temporary construction compounds.</li> <li>• Regarding land sterilisation, the easement area will have limitations on what can be accommodated in the future, however development losses which can be evidenced as a direct result of the project, can be compensated for.</li> </ul>
RR-017.27	<p>6.0 Consultation</p> <p>6.1 In addition to the evidence of poor consultation and lack of any meaningful engagement beyond the minimum necessary lip service believed to be necessary to secure these draconian powers, the Promoter has sought to discourage and disincentivise proper debate at Public Inquiry by declining to produce hard copies of the documents to statutory objectors. The DCO notice received on 26 March 2024 advised as follows: "Provision of hard copies of the ES will be subject to a maximum charge of £7,000, plus VAT, to cover printing and delivery costs." One of the Objectors is in their late 80's unable to drive and with vision difficulties and unable to read a computer screen and yet the Promoter expects her to travel to either Llandudno or Rhyl in order to inspect hard copies of the document as the Promoter's charges for them are simply prohibitive.</p>	<p>The Applicant is a responsible developer committed to listening to the views of stakeholders including landowners and members of the local community. Statutory consultation is a key part of the planning process, one which the Applicant took seriously; a Consultation Report was submitted with the DCO application (APP-037) explaining how the Applicant complied with the pre-application consultation requirements set down in the Planning Act 2008 and had regard to all the feedback submitted.</p> <p>From the outset, the Applicant promoted a digital-first consultation and designed a project website that is easily accessible to a wide range of users. That said, the Applicant consulted using a variety of methods to help explain the proposals and encourage people to provide their comments. Community focused materials included a consultation postcard, website, brochure and a non-technical summary of the PEIR (PEIR NTS). The Applicant also organised a series of consultation events, located at accessible public locations, where a full copy of the PEIR was available for reference, as well as large scale maps with further details on the locations for attendees to view and discuss. Project 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.</p>



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Reference	Relevant Representation Comment	Applicant's response
		<p>USB sticks containing the PEIR, and printed copies of the PEIR NTS and the Consultation Brochure were available to take away.</p> <p>When the Applicant's application for a DCO was accepted the digital-first approach continued, with all documents available on the project's pages on the National Infrastructure Planning website. With the volume of the full suite of documents in the many thousands of pages, the Applicant's Section 56 notification offered assistance to anyone with accessing the documents relevant to them: "If you require an alternative method for inspection of the DCO application or have any queries, including how to access the documents on the Planning Inspectorate's website, please call the Applicant on 0800 860 6263 or email <a href="mailto:info@monaoffshorewind.com">info@monaoffshorewind.com</a>."</p> <p>Again, due to the volume of the full suite of documents, and with particular reference to the Applicant's commitment to the environment and sustainability, it was deemed reasonable to charge a fee for printed materials: "The Applicant can also provide any of the documents as required on a USB (free of charge). Hard copies of the NTS can also be provided upon reasonable request. Provision of hard copies of the ES will be subject to a maximum charge of £7,000, plus VAT, to cover printing and delivery costs."</p> <p>The Applicant considers its commitments to aiding people with the use of resources to be more than reasonable.</p> <p>The Applicant received requests for printed copies of all DCO application documents from the representative of the four named respondents. Following a discussion with said representative about the volume of documents that makes up the DCO application, the Applicant offered a view on which documents it thought would be of most relevance (Works Plan - Onshore, Land Plan, Statement of Reasons and the Site Selection BRAG chapter) and offered to send hard copies of these free of charge.</p> <p>The representative responded stating this "may be a sensible compromise" and requested that the Applicant initially forward a link to the pdf of the Statement of Reasons (APP-029) and a list of all the documents in the document library in pdf format for perusal. These links were shared, and at time of writing, no further response had been received.</p>
RR-017.28	<p>7.0 Conclusion</p> <p>7.1 The Promoter has not demonstrated that it has fully considered the impact that the Order and the use of this</p>	<p>The Applicant has demonstrated through the site selection and consideration of alternatives process (as outlined in Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) and supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>Land will have upon the landowners and its current and future plans.</p> <p>7.2 Any potential public benefit resulting from the use of all or part of this land does not outweigh the harm, which would be caused to the Objectors.</p> <p>7.3 It is clear that in choosing to locate the cables on the Objector's land then the Promoter has merely paid lip service to the Objector's issues and instead has ploughed on regardless not due to the "compelling case in the public interest" or "indispensable" nature of the land to the scheme but rather due to general and commercial convenience and desirability in furtherance of its private profit. Better alternative routes and solutions have been dismissed out of hand due to the Promoter's assumption that the draconian powers it seeks will be granted to it as a matter of course. This is unfair.</p>	<p>4.2: Site Selection BRAG Report annex (APP-082)) that a rigorous and robust process has been followed.</p> <p>Decisions made by the Applicant in response to consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible. If it has not been possible to avoid or reduce the impact on a particular landowner, then this has been because of the requirements for engineering feasibility or to avoid potential impacts associated with environmental constraints.</p> <p>The Applicant continues to seek voluntary agreement for the rights sought.</p>
RR-017.29	<p>7.4 The alternatives that are referred to in section 4.0 (to be evidenced further at Inquiry) would each enable the Objectors to withdraw these objections. The suggestions in Section 5.0 (to be evidenced further at Inquiry) would alleviate the strength of the Objectors' objections. Each alternative deserves a proper robust investigation and the Promoter put to strictly evidence why they have not considered them.</p> <p>7.5 The Objectors therefore request to have their objections treated as a Statutory Objections and be given the opportunity to air their views to the proposal at a Public Local Inquiry where the issues they raise can be given a fair hearing by the Inspector who will duly report to the Secretary of State having proper regard to the need to strike a fair balance between weighing up whether the public benefit is sufficiently significant to outweigh the damaging impact of the taking of interest this land or, on the other hand, whether the land's inclusion in the Order has merely been for the convenience of and desirability of the Promoter's return on investment.</p>	<p>The Applicant has considered each of the alternatives raised by the Objector within Section 4.6.2, Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051); supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082)).</p> <p>The Applicant notes the objection and welcomes the opportunity to discuss these matters further through the Examination process.</p> <p>The Applicant will continue to seek voluntary agreement for the rights sought.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-017.30	Kindly keep us informed of progress with the DCO and the Public Inquiry process. Yours faithfully Mrs H M Parry Mr R W Parry Mr G W Parry Mrs E W Wade	Noted by the Applicant and we will continue to engage.

## 2.18 Emily Curphey, Chair, Territorial Sea Committee, Isle of Man

**Table 2.18: RR-018 – Emily Curphey, Chair, Territorial Sea Committee, Isle of Man**

Reference	Relevant Representation Comment	Applicant's response
RR-018.1	The following comments are made on behalf of the Isle of Man Territorial Seas Committee: Benthic subtidal and intertidal ecology - Crogga and the Mooir Vannin windfarm developments occur within Manx territorial waters, but only Crogga appears to be identified as such. Acknowledging they're Tier 1 and Tier 2, both operating under Manx jurisdiction should be specifically noted.	Mooir Vannin is assessed in the Cumulative Effect Assessment within Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) and is shown on Figure 2.10 to be in Manx territorial waters as 'Isle of Man OWF'.
RR-018.2	Offshore ornithology - Welcome applicant's decision to increase the air draught below the turbines. Note that the great black backed gull is an Isle of Man red list Bird of Conservation Concern, with a decline in the breeding population. While it's (low) risk in general in the region, it may mask Isle of Man specific impacts.	<p>The Applicant notes the Territorial Sea Committee's comment regarding the air draught which was maintained at 34 m above Lowest Astronomical Tide between the Preliminary Environmental Information Report and the Environmental Statement.</p> <p>The Applicant notes that great black-backed gull is an Isle of Man red-listed species. Isle of Man colonies have been included within Table 1.26 of Volume 6, Annex 5.5: Offshore ornithology apportioning technical report (APP-095) and as indicated within Table 5.12 of Volume 2, Chapter 5: Offshore Ornithology (APP-057), great black-backed gull have been assessed for significance of effects for the Mona Offshore Project from collision risk.</p> <p>The colony within the Isle of Man with breeding great black-backed gull is the Calf and Wart Bank Marine Nature Reserve (MNR). The apportioning report predicted that 4.9 % of the impact could be apportioned to this colony (Table 1.26 of Volume 6, Annex 5.5: Offshore ornithology apportioning technical report (APP-095)). During the non-breeding season, the total population of Isle of Man (approximately 168 breeding adults) would represent ~2% of the total non-breeding population.</p> <p>No MNR within the Isle of Man is predicted to surpass the threshold for needing a PVA for great black-backed gull from increase in baseline mortality from the Mona Offshore Wind Project alone.</p>
RR-018.3	Commercial fisheries - Queries over "this receptor group almost exclusively operates out of ICES Rectangle 36E5" - is not accurate as these vessels also operate within the ICES 37 rectangles, but excluded from the study area. The statement of exclusive operation within ICES 36 rectangles	This comment by the Territorial Sea Committee is relevant to the Isle of Man scallop vessels receptor group identified and defined within Volume 2, Chapter 6: Commercial fisheries (APP-058). The commercial fisheries study area for the Mona Offshore Wind project was defined by the International Council for the Exploration of the Sea (ICES) Rectangles that contain the Mona Array Area and Offshore Cable Corridor (ICES Rectangles 35E5, 35E6, 36E5 and 36E6), which

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Reference	Relevant Representation Comment	Applicant's response
	<p>is also used elsewhere (e.g. 6.8.6.13) and may be similarly inaccurate</p>	<p>adequately ensures that potential impacts (i.e. displacement of fishing vessels) from the Mona Offshore Wind Project on commercial fisheries are fully assessed. The statement quoted from the chapter by the Territorial Sea Committee is accurate, which fully reads as <i>“Within the commercial fisheries study area, according to landing statistics during the study period (2012 to 2022), this receptor group almost exclusively operates out of ICES Rectangle 36E5 and, therefore, exhibits limited spatial adaptability”</i>. However, receptors outside of ICES Rectangle 36E5 have not been excluded, for instance those within the ICES 37 Rectangles have been considered within the cumulative assessment (as set out under section 6.9.1 of Volume 2, Chapter 6: Commercial fisheries (APP-058)).</p>
<p>RR-018.4</p>	<p>Shipping and navigation - Reiterate previous statements in respect of the importance of the Island's lifeline shipping services and their preservation; avoidance of adverse impacts, including timing, frequency and reliability. Continued consideration of cumulative impacts and the interaction with the forthcoming Moir Vannin is requested alongside other Round 4 projects. Continued direct engagement with the Isle of Man Steam Packet Company is essential.</p>	<p>The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would need to deviate around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to ferry services. Following the PEIR and S42 responses, the Mona Offshore Wind Project has modified the boundaries of the wind farm array area which has increased the available searoom to minimise the impacts to ferries, and has reduced the deviations required (as set out in section 7.9 and 7.11 of Volume 2, Chapter 7: Shipping and navigation (APP-059) and in section 4.11.2 of Volume 1, Chapter 4: Site selection and consideration of alternatives (APP-051)).</p> <p>The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also amended the boundaries of 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. As a result of these boundary amendments and commitments to control measures (e.g. development and adherence to an Aids to Navigation Management Plan, Design Plan, an Offshore Environmental Management Plan that includes a Fisheries Liaison and Co-existence Plan, an Offshore Construction Method Statement, which includes a Cable Specification and Installation Plan, a Vessel Traffic Management Plan, an Emergency Response and Cooperation Plan and use of notice to mariners, as set out in section 7.8 of Volume 2, Chapter 7: Shipping and navigation (APP-059) and which are all secured within the deemed marine licence in Schedule 14 of the draft DCO and expected to be secured within the standalone NRW marine licence), and noting that a residual risk over the baseline remains, the NRA Hazard Workshop concluded that all hazards, previously identified as unacceptable at PEIR, had been reduced to As Low As Reasonably Practicable (ALARP).</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>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.</p> <p>The Applicant will continue engaging with the Isle of Man Steam Packet Company throughout the examination phase of the Mona Offshore Wind Project.</p>
RR-018.5	<p>Transboundary Impacts Screening - Appears a contradiction in respect of Manx commercial fisheries (Table 1.1). Commercial fisheries should be scoped in transboundary assessment, recognised in 1.6.1.2 and 1.9.1.1.</p>	<p>The Isle of Man is a Crown Dependency of the UK and not a European Economic Area (EEA) State. Therefore, Regulation 32 of the EIA Regulations 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 commercial fisheries receptors within the Isle of Man are fully considered Volume 2, Chapter 6: Commercial fisheries (APP-058).</p>
RR-018.6	<p>Commercial Fisheries Technical Report - Request the following: - The Fish and Shellfish ecology study area is significantly greater than the Commercial Fisheries study area. We previously requested expansion of the benthic, fish and shellfish and commercial fisheries study areas to better reflect ecological, jurisdictional or commercial boundaries. Accepted for the former two receptors but not the latter.</p>	<p>The commercial fisheries study area for the Mona Offshore Wind project is defined by the ICES Rectangles that contain the Mona Array Area and Offshore Cable Corridor (ICES Rectangles 35E5, 35E6, 36E5 and 36E6), which adequately ensures that potential impacts (i.e. displacement of fishing vessels) from the Mona Offshore Wind Project on commercial fisheries are fully assessed. Given the operational ranges of the fishing fleets active in the region, and considering feedback from consultation, the study area for the Cumulative Effects Assessment (CEA) for commercial fisheries is larger than the commercial fisheries study area used. This larger cumulative commercial fisheries study area is defined by ICES rectangles 35E5, 35E6, 35E7, 36E5, 36E6, 36E7, 37E5, 37E6 and 37E7. This was considered an appropriate extent for assessing the potential impacts on commercial fisheries receptors as a result of the Mona Offshore Wind Project and any cumulative impacts.</p> <p>Impacts on fish stocks have been assessed in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). The fish and shellfish ecology study area covers the east Irish Sea extending from mean high water springs (MHWS) west from the Mull of Galloway in Scotland to the west tip of Anglesey, following the territorial waters 12 nm limit of the Isle of Man, based on consultation with the benthic ecology fish and shellfish and physical processes Expert Working Group and all relevant stakeholders (see section 3.3.2. in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054)). This study area has been selected to account for the spatial and temporal variability of all relevant fish and shellfish populations, including fish migration. This area was considered appropriate as it will ensure the characterisation of all fish and shellfish receptors within the east Irish Sea and is</p>

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Reference	Relevant Representation Comment	Applicant's response
		therefore large enough to consider all direct (e.g. habitat loss/disturbance within project boundaries) and indirect impacts (e.g. underwater sound over a wider area) associated with the Mona Offshore Wind Project on the identified receptors.
RR-018.7	Correction to Figure 1.36 (queen scallop), since if this is not accurately scoped then the potential displacement effects on commercial fisheries will also not be adequately scoped. More information can be provided.	Figure 1.36 within Volume 2, Annex 6.1: Commercial fisheries technical report (APP-097) is an image of a typical dredge gear configuration, with text relevant to this figure summarising the method of which this gear type is operated within the commercial fisheries study area of the Mona Offshore Wind Project. The Applicant is engaging with the Territorial Sea Committee to fully understand their concerns on this point.
RR-018.8	Previously requested vessels <15m be included within the dataset; this has not been updated. Unclear how a reasonable assessment of displacement or other impact effects can be estimated.	It is acknowledged that there is a lack of data for vessels <15 m in length. To ensure that smaller vessels were represented in the baseline, multiple datasets have been collated which capture vessels <15 m in length, such as the scouting potting surveys and marine traffic surveys. Additional king and queen scallop swept area (km <sup>2</sup> ) data and crab, lobster and whelk pot haul data (2017 to 2023) were provided by the Isle of Man Government following statutory consultation. All licenced scallop fishing vessels, regardless of size and country of origin, are required to operate a VMS system in Manx Territorial Waters. The assessment is robust because the additional datasets provide comprehensive coverage of vessels permitted to operate within Manx waters, of all vessel sizes (i.e. including vessels <15 m). This data was incorporated into Volume 2, Annex 6.1: Commercial fisheries technical report (APP-097) and was brought into the commercial fisheries assessment.
RR-018.9	Queries over queen scallop fishing grounds and treatment of king and queen scallop grounds. Clarification can be provided.	The Applicant is engaging with the Territorial Sea Committee to fully understand their concerns.
RR-018.10	It is still not apparent that adequate inclusion of the Bangor University scallop survey data has been undertaken. Fish and Shellfish Ecology Technical Report	The Welsh Waters Scallop Surveys and Stock Assessment report by Delargy <i>et al.</i> (2019) is referenced as a data source in Table 1.1 of Volume 6, Annex 3.1: Fish and shellfish ecology technical report (APP-089), and relevant information from this report is extracted to support the comprehensive baseline characterisation for king and queen scallop presented in section 1.10.2.  The information extracted from Delargy <i>et al.</i> (2019) is considered sufficient to support the baseline characterisation, combined with the numerous other data sources referenced.

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Reference	Relevant Representation Comment	Applicant's response
RR-018.11	Queries over king and queen scallop data sets. Clarification can be provided.	<p>The king scallop fishing grounds data presented in Figure 1.34 of Volume 6, Annex 3.1: Fish and shellfish ecology technical report (APP-089) are adapted from ICES (2020) and cross-references to VMS data.</p> <p>The queen scallop fishing ground data presented in Figure 1.35 of Volume 6, Annex 3.1: Fish and shellfish ecology technical report (APP-089) are drawn from a combination of stakeholder engagement outputs and VMS data.</p> <p>The Applicant is engaging with the Territorial Sea Committee to fully understand their concerns.</p>
RR-018.12	Seascape Visualisations. Previously expressed concerns withdrawn provided the installed wind turbines are of the height shown in the visualisations. However, were there a change to larger turbines, then this would represent a cause for concern, particularly considering cumulative visual impact resulting from other developments.	Volume 1, Chapter 3: Project description (APP-050) presents the maximum wind turbine parameters for the Mona Offshore Wind Project. Volume 7, Annex 6.6: Landscape visualisations (APP-157 to APP-159) presents the fewest number of tallest wind turbines; this is the maximum design scenario that has been assessed in Volume 2, Chapter 8: Seascape and visual resources (APP-060). The Mona Offshore Wind Project will not be constructed with wind turbines larger than those presented in Volume 1, Chapter 3: Project description (APP-050) and Volume 7, Annex 6.6: Landscape visualisations (APP-157 to APP-159).
RR-018.13	Aviation - Request continued engagement to ensure that any offshore wind farms does not compromise the safety of the Island's air travel	Engagement with Isle of Man Ronaldsway Airport is continuing throughout the examination phase to reach a mutually agreed mitigation solution which will reduce any impact to acceptable levels.



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2.19 Eni UK

Table 2.19: RR-019 – Eni UK

Reference	Relevant Representation Comment	Applicant's response
RR-019.1	Eni UK Limited (Eni UK) wishes to be registered as an interested party in the examination. Eni UK's Liverpool Bay Development comprises oil and gas fields located in the Eastern Irish Sea, including infrastructure in the vicinity of the proposed Mona Wind Project.	The Applicant notes the response.
RR-019.2	The Liverpool Bay oil and gas fields are approaching the end of their productive lives, following which Eni UK plans to reutilize three of the depleted gas fields as CO2 storage reservoirs, as part of the proposed HyNet North West Carbon Capture and Storage (CCS) development. Simultaneously Eni UK plans to decommission all of the existing oil and gas infrastructure not required for the Hynet CCS development. Eni UK and the Applicant's project activities will therefore be ongoing simultaneously in the Eastern Irish Sea, which forms the basis of Eni UK's interested party registration.	The Applicant notes the response.
RR-019.3	In this context, we have identified a range of issues which need further consideration as part of the application. These matters include (inter alia): 1. Timing and the potential for simultaneous operations to occur (SIMOPS): a. Cumulative impact of the Applicant's proposed development and Eni's activities ongoing simultaneously, potentially in close proximity, in the Eastern Irish Sea. b. Demand on local marine resources created by the Applicant's proposed development. c. Potential synergies between Eni UK and the Applicant's activities. d. A commitment by both parties to keep each other informed regarding project status.	The Applicant has engaged with Eni throughout the pre-application phase through direct meetings as set out in section 10.3 of Volume 2, Chapter 10: Other sea users (APP-062), Eni's representation on the Marine Navigation Engagement Forum and attendance at Navigation Risk Assessment Hazard Workshops as set out under section 7.3 in Volume 2, Chapter 7: Shipping and Navigation (APP-059). Eni's installations were also included in cumulative effects assessment considerations (see Table 1.7 and 1.8 and sections 1.12 – 1.13 in Volume 5, Annex 5.1: Cumulative effects screening matrix (APP-084)) and resulting EIA topic-specific assessment on aviation and radar where no significant impacts were predicted (see Volume 4, Chapter 1: Aviation and Radar (APP-075)).  The Applicant acknowledges the proximity of Mona Offshore Wind Project, the important of SIMOPS engagement and the need for both parties to keep each other informed of project status and activity, which has been an important feature of the Applicant's engagement to date.  As set out in Table 10.16 of Volume 2, Chapter 10: Other sea users (APP-062) the Mona Offshore Wind Project has committed to continued consultation through the

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Reference	Relevant Representation Comment	Applicant's response
		<p>life of the project, as required, with other offshore energy operators to minimise disruption to either party's operations and maximise coexistence.</p> <p>The Applicant will continue to engage with Eni throughout the Examination and the parties intend to submit an initial Statement of Common Ground (SOCG) at Deadline 1.</p>
RR-019.4	<p>2. Proximity of the Applicant's proposed development to Eni UK's infrastructure, including in particular the Conwy installation. An example is cable routing included in the Applicant's proposed development.</p>	<p>In response to feedback to the statutory consultation on the Preliminary Environmental Information report, the Applicant revised the eastern boundary of the Mona Array Area as explained in section 4.11.2 and Table 4.23 in Volume 2, Chapter 4: Site selection and consideration of alternatives (APP-051). As a result, the proximity of the eastern boundary of the Mona Array Area from the Eni Conwy installation was increased from several kilometres to approximately 8.5 km as shown in Figure 10.5 of Volume 2, Chapter 10: Other sea users (APP-062).</p> <p>The Mona Offshore Cable Corridor is at its closest approximately 8.5 km with the majority significantly further away from the Conwy installation as shown in Figure 10.5 of APP-062.</p>
RR-019.5	<p>3. The potential for overlap or interference in logistics activities, including:</p> <ul style="list-style-type: none"> <li>a. Diving activities</li> <li>b. Vessel traffic</li> <li>c. Survey activities</li> <li>d. Aviation</li> </ul>	<p>The Applicant acknowledges the proximity of Mona Offshore Wind Project, the important of SIMOPS engagement and the need for both parties to keep each other informed of project status and activity, which has been an important feature of our engagement to date.</p> <p>As set out in Table 10.16 of Volume 2, Chapter 10: Other sea users (APP-062) the Mona Offshore Wind Project has committed to continued consultation through the life of the project, as required, with other offshore energy operators to minimise disruption to either party's operations and maximise coexistence. With respect to vessel traffic specifically, the Applicant has also committed to continuing the Marine Navigation Engagement Forum post-consent, which is secured through the Mitigation and Monitoring Schedule (APP-196) and preparing a Vessel Traffic Management Plan (VTMP). The VTMP secures the co-ordination of Mona Offshore Wind Project vessels during construction and operations and maintenance by the Project Marine Co-ordination Centre to ensure project vessels do not present unacceptable risks to each other or third parties. The VTMP, which is to accord with the Outline VTMP (APP-200) is secured in Schedule 14, Condition 18(1)(k) in C2 Draft Development Consent Order (F02)</p> <p>The Applicant will continue to engage with Eni throughout the Examination and the parties intend to submit an initial Statement of Common Ground (SOCG) at Deadline 1.</p>

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<b>Reference</b>	<b>Relevant Representation Comment</b>	<b>Applicant's response</b>
RR-019.6	<p>4. Stakeholder interests</p> <p>Eni UK looks forward to engaging constructively with the Applicant in relation to these and any other issues what may be identified during the application process.</p>	<p>The Applicant will continue to engage with Eni throughout the Examination and the parties intend to submit an initial Statement of Common Ground (SOCG) at Deadline 1.</p>

## 2.20 euNetworks

Table 2.20: RR-020 – McMahon Design & Management Ltd on behalf of euNetworks

Reference	Relevant Representation Comment	Applicant's response
RR-020.1	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.	The Applicant notes the response.
RR-020.2	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. We are in discussions with Mona on these issue but would also like to register as an interested party and be kept up to date on progress.	<p>The Rockabill telecommunications cable was identified as an existing asset in the Volume 2, Chapter 10: Other sea users of the Environmental Statement (APP-62), where it is noted under section 10.9.4 that <i>“Cable crossing and proximity agreements will be established with relevant cable operators, to minimise the potential for any impact in accordance with recognised industry good practice. These agreements will ensure close communication and planning between both parties to ensure disruption of activities is minimised”</i>.</p> <p>The Applicant, euNetworks and McMahon Design and Management Ltd are engaging on crossing and proximity agreements which will be finalised post-consent, prior to commencement of construction.</p>

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**2.21 G W Parry**
**Table 2.21: RR-021 – G W Parry**

Reference	Relevant Representation Comment	Applicant's response
RR-021.1	I am one of the owners of plots 06-101, 06-102, 06-103, 06-104, 06-105 and wish to object to the proposed cable route on the following non exhaustive grounds: The Promoter has failed to consider all reasonable options for power transmittal methods – Evidence will be adduced at Inquiry for this.	<p>The Applicant has undertaken a rigorous and robust site selection process in relation to the onshore cable route for the Mona Offshore Wind Project.</p> <p>A full reasoning and justification for the selection of the onshore cable route is provided in Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). This is also supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p>
RR-021.2	The Promoter has failed to consider all reasonable route options that would score equally well in its BRAG report – Evidence will be adduced at Inquiry for this.	<p>The optimum route for an onshore grid connection is generally considered to be the shortest route from A to B from landfall to Bodelwyddan National Grid Substation. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore cable route.</p>
RR-021.3	The Promoter has failed to consider a combination of different power transmittal methods and reasonable route options that would score equally well in its BRAG report – Evidence will be adduced at Inquiry for this.	<p>Decisions made by the Applicant in response to landowner and consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible.</p> <p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons. This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
RR-021.4	The current power transmittal proposals will not cater for the full generation capacity of Mona Offshore Windfarm leading to a bottleneck in the power supply. This also curtails the capacity for future upgrades. This would not be the case in the event of different transmittal methods and better route	<p>The Applicant can confirm that the base case design constitutes 4 circuits of 220kv cables, with each circuit having the transmittal capacity of circa 375MW. These details are confirmed in Section 3.7.2 of Volume 1, Chapter 3: Project Description (APP-050). On this basis, there will be sufficient transmittal capacity for the Mona Offshore Wind Project.</p>

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Reference	Relevant Representation Comment	Applicant's response
	selection or a combination of both – Evidence will be adduced at Inquiry for this.	
RR-021.5	Locally the land take is extremely excessive and this could be significantly reduced by different transmittal methods and better route selection or a combination of both – Evidence will be adduced at Inquiry for this.	<p>The Applicant has undertaken a rigorous and robust site selection process in relation to the onshore cable route for the Mona Offshore Wind Project.</p> <p>A full reasoning and justification for the selection of the onshore cable route is provided in Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). This is also supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p> <p>The optimum route for an onshore grid connection is generally considered to be the shortest route from A to B from landfall to Bodelwyddan National Grid Substation. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore cable route.</p> <p>Decisions made by the Applicant in response to consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible.</p> <p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons. This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
RR-021.6	The land has special value to us and future proposals over other land locally and cannot be replaced – Evidence will be adduced at Inquiry for this.	The principle point of land value is not a matter for the examination and will be addressed through negotiations. However, the point is noted and the Applicant looks forward to receiving evidence testing to the value suggested through voluntary negotiations.
RR-021.7	Requests to consider alternative arrangements have been brushed aside with little or no consideration by the Promoter.	Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were

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Reference	Relevant Representation Comment	Applicant's response
	<p>There is little or no regard for the impacts on us which is very unfair – Evidence will be adduced at Inquiry for this.</p>	<p>discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons. This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p> <p>In addition to the strategic-level decision making, a preliminary Engineering feasibility assessment undertaken to define the scope of the Mona Offshore Wind Project stipulated that underground cables are less affected by weather conditions, offer higher reliability and security than overhead cables, are less prone to interference from external factors, reduce the risk of electrocution or injury to people or animals, are less prone to explosion or fire, and are easier to maintain.</p> <p>The Applicant carried out a statutory consultation in 2023; this is a key part of the planning process, which the Applicant undertook in order to understand community views. The Applicant submitted a Consultation Report (APP-037) with its DCO application that explained 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.</p> <p>The Applicant will continue to engage with G W Parry throughout the Examination process and is keen to understand any further information that can be provided.</p>
RR-021.8	<p>The scheme, certainly to the extent that our land is concerned, has been designed for the convenience of the Promoter and also minimising their costs in order to maximise their return on investment rather than on the basis of there being a compelling case in the public interest overriding the harm done to us as the impacted landowners – Evidence will be adduced at Inquiry for this.</p>	<p>The land take proposed for the scheme is proportionate to the works required and applicant will seek to minimise land take through construction where possible. Heads of terms which include consideration for the rights sought and disturbance caused have been issued and are being negotiated.</p> <p>The Statement of Reasons (APP-029) sets out the Applicant's justification for seeking powers of compulsory acquisition, and that a compelling case exists in the public interest which justifies the making of the DCO with those powers.</p>
RR-021.9	<p>In addition to consultation failings and lack of any meaningful sincere engagement beyond the minimum necessary lip service believed to be necessary to secure these draconian CPO powers, the Promoter has sought to discourage and disincentivise proper debate at Public Inquiry by declining to produce hard copies of the documents to statutory objectors. As can be seen from the DCO notice received on 26 March 2024 they will charge up to £7,000 to provide hard copies of their reports and documents. One of the co-owners, my mother is in their late</p>	<p>The Applicant is a responsible developer committed to listening to the views of stakeholders including landowners and members of the local community. Statutory consultation is a key part of the planning process, one which the applicant took seriously; a Consultation Report was submitted with the DCO application (APP-037) explaining how the Applicant complied with the pre-application consultation requirements set down in the Planning Act 2008 and had regard to all the feedback submitted.</p> <p>From the outset, the Applicant promoted a digital-first consultation and designed a project website that is easily accessible to a wide range of users. That said, the Applicant consulted using a variety of methods to help explain the proposals and</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>80's unable to drive and with vision difficulties and unable to read a computer screen and yet the Promoter expects her to travel to either Llandudno or Rhyl in order to inspect hard copies of the document as the Promoter's charges for them are simply prohibitive.</p>	<p>encourage people to provide their comments. Community focused materials included a consultation postcard, website, brochure and a non-technical summary of the PEIR (PEIR NTS). The Applicant also organised a series of consultation events, located at accessible public locations, where a full copy of the PEIR was available for reference, as well as large scale maps with further details on the locations for attendees to view and discuss. Project 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.</p> <p>When the Applicant's application for a DCO was accepted the digital-first approach continued, with all documents available on the project's pages on the National Infrastructure Planning website. With the volume of the full suite of documents in the many thousands of pages, the Applicant's Section 56 notification offered assistance to anyone with accessing the documents relevant to them: "If you require an alternative method for inspection of the DCO application or have any queries, including how to access the documents on the Planning Inspectorate's website, please call the Applicant on 0800 860 6263 or email <a href="mailto:info@monaoffshorewind.com">info@monaoffshorewind.com</a>."</p> <p>Again, due to the volume of the full suite of documents, and with particular reference to the Applicant's commitment to the environment and sustainability, it was deemed reasonable to charge a fee for printed materials: "The Applicant can also provide any of the documents as required on a USB (free of charge). Hard copies of the NTS can also be provided upon reasonable request. Provision of hard copies of the ES will be subject to a maximum charge of £7,000, plus VAT, to cover printing and delivery costs." The Applicant considers its commitments to aiding people with the use of resources to be more than reasonable.</p> <p>The Applicant received requests for printed copies of all DCO application documents from the representative of the four named respondents. Following a discussion with said representative about the volume of documents that makes up the DCO application, the Applicant offered a view on which documents it thought would be of most relevance (works plans, land plans, statement of reasons and site selection BRAG) and offered to send hard copies of these free of charge.</p> <p>The representative responded stating this "may be a sensible compromise" and requested that the Applicant initially forward a link to the pdf of the statement of reasons and a list of all the documents in the document library in pdf format for</p>



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Reference	Relevant Representation Comment	Applicant's response
		consideration. These links were shared, and at time of writing, no further response had been received.
RR-021.10	In addition to the above summary please see formal letter of objection dated 3rd May 2024 submitted by post and email to the planning inspectorate and National Infrastructure Commission. We look forward to explaining the above issues in detail to the inspector at the Inquiry	This is noted by the Applicant. The Applicant welcomes discussion on detailed points through negotiations of the heads of terms.
RR-021.11	Dear Sirs We have been notified that MONA OFFSHORE WIND LTD ("Promoter") has made the above application for Compulsory Purchase Powers and we wish to object to the confirmation of this order as submitted on the following non exhaustive grounds:	This is noted by the Applicant and heads of terms for a voluntary agreement have been issued and we look forward to progressing negotiations of those.
RR-021.12	<p>1.0 Introduction and background</p> <p>1.1 We are Harriett Mary Parry, Robert Wynne Parry, Griffith Wayne Parry, and Elizabeth Wynne Wade ("Objectors") being the joint owners of land ("Property") affected by this Development Consent Order ("DCO").</p> <p>1.2 The Property is identified as Plots 06-101, 06-102, 06-103, 06-104c, 06-105 in the Book of Reference and on the Mona Land Plan.</p> <p>1.3 In line with current government policy although entirely for private profit, the Promoter is proposing to construct scheme to build an offshore wind farm comprising of up to 96 wind turbines within an area of circa 300 square KM offshore from Abergele in North Wales.</p> <p>1.4 Whilst estimates vary according to source and the dates, the Promoter claims that the scheme will generate up to 1.5 Gigawatts of electrical power and this power is intended to be transmitted from its point of landfall between Llandulas and Abergele and then by underground cables to a substation at Bodelwyddan behind St Asaph Business Park.</p> <p>1.5 Notwithstanding that this is a scheme for private commercial profit, the Promoter has sought to use statutory public DCO powers under Section 56 of the Planning Act</p>	The Applicant notes the points raised.

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Reference	Relevant Representation Comment	Applicant's response
	<p>2008 to assemble the land that it considers necessary to accommodate its scheme.</p> <p>1.6 The relevant notification of making of the CPO issued by the Acquiring Authority and received by the Objectors is dated 26th March and specifies that Objections must be made 'by 6th May 2024'.</p> <p>1.7 The Objectors are a "qualifying person" within the meaning of s.12(2) of the Acquisition of Land Act 1981 and are therefore statutory objectors.</p> <p>1.8 The Objectors are also "Affected Persons" for the purposes of Section 59 and 92 of the Planning Act 2008.</p> <p>1.9 Whilst the Objectors' points of objection are the same and hence are recorded in this single letter of objection, there are in fact 4 separate individual parties objecting here and they should be treated individually as Objectors in their own right.</p>	
RR-021.13	<p>1.10 Section 122 of the Planning Act 2008 states:- "122 Purpose for which compulsory acquisition may be authorised</p> <p>(1) An order granting development consent may include provision authorising the compulsory acquisition of land only if the [F1Secretary of State] is satisfied that the conditions in subsections (2) and (3) are met.</p> <p>(2) The condition is that the land -</p> <p>(a) is required for the development to which the development consent relates,</p> <p>(b) is required to facilitate or is incidental to that development, or</p> <p>(c) is replacement land which is to be given in exchanged for the order land under section 131 or 132.</p> <p>(3) The condition is that there is a compelling case in the public interest for the land to be acquired compulsorily." (emphasis added)</p>	<p>This is noted and welcomed by the Applicant.</p> <p>The Applicant can confirm that the Mona Offshore Wind Project understands the requirements for which compulsory acquisition may be authorised.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-021.14	<p>1.11 Lord Justice McGowan noted in Sharkey V Buckinghamshire District Council that "required" in 2) a) of Section 122 of the Planning Act 2008 does not mean that the land in question has to be "indispensable" however it does not mean that the land is merely "desirable" or "convenient" for the purposes of the scheme either.</p> <p>1.12 It should be further noted that confirmation of the Order also depends on meeting the test that there is a compelling case in the public interest for the land to be acquired compulsorily in Section 3) of the 122 of the Planning Act 2008.</p> <p>1.13 Section 13 of the "Guidance on Compulsory purchase process and The Crichel Down Rules" produced by the Department for Levelling Up, Housing and Communities July 2019 states:"13. How will the confirming minister consider the acquiring authority's justification for a compulsory purchase order? The minister confirming the order has to be able to take a balanced view between the intentions of the acquiring authority and the concerns of those with an interest in the land that it is proposing to acquire compulsorily and the wider public interest. (emphasis added) Section 18 of the Memorandum to Circular 06/04 ends with :..... Parliament has always taken the view that land should only be taken compulsorily where there is clear evidence that the public benefit will outweigh the private loss. The Human Rights Act reinforces that basic requirement. (emphasis added)</p>	<p>This is noted and welcomed by the Applicant.</p> <p>The Applicant can confirm that the Mona Offshore Wind Project understands the requirements for which compulsory acquisition may be authorised.</p>
RR-021.15	<p>1.14 Evidence will be adduced to demonstrate that much of the design of the scheme, certainly to the extent that it impacts on landowners and certainly the Objectors and the Property, has been developed for general and commercial convenience to the Promoter and infurtherance of its private profit rather than from the view that there is a compelling case in the public interest that outweighs the harm done. In its commercial pursuit, the Promoter has failed to take proper account of representations from the Objectors which is unfair.</p>	<p>The Applicant has undertaken a rigorous and robust site selection process in relation to the onshore cable route for the Mona Offshore Wind Project.</p> <p>A full reasoning and justification for the selection of the onshore cable route is provided in Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). This is also supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p> <p>The optimum route for an onshore grid connection is generally considered to be the shortest route from A to B from landfall to Bodelwyddan National Grid</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-021.16	<p>1.15 In addition to the above the Objectors wish to object to the Order on the following non exhaustive grounds:</p> <p>2.0 The Onshore Power Transmittal Route Generally</p> <p>2.1 The applicant has not demonstrated that the route proposed is the most appropriate route for the scheme. The Power Transmittal Route seeks to terminate at a substation at Bodelwyddan which, as the crow flies, is some 10KM from where the cable breaks land. The route selection report purports to have carried out a Brown Red Amber Green ("BRAG") report to show that the 14.75KM route selected is optimum. However at least 4 alternative routes have been identified and evidence will be adduced to demonstrate how they are at least equivalent to and often superior to the selected route in terms of the BRAG report and general common sense.</p>	<p>Substation. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore cable route.</p> <p>Decisions made by the Applicant in response to consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible.</p> <p>The Statement of Reasons (APP-029) sets out the Applicant's justification for seeking powers of compulsory acquisition, and that a compelling case exists in the public interest which justifies the making of the DCO with those powers.</p>
RR-021.17	<p>3.0 General Disruption During Construction</p> <p>3.1 The implementation of the scheme on shore will be extremely disruptive both on private land and to the wider public for instance by it causing widespread disruption to traffic flows and the public highway generally and thereby to statutory and essential services to locals and visitors including tourists. This will be to the detriment of local, businesses, residents and visitors alike. It is also likely to cause noise, dust, vibration, fumes and other disturbances generally which are a concern. The Promoter has failed to evidence that these have been given proper consideration when developing its scheme.</p>	<p>The Applicant has considered potential impacts associated with traffic and transport, noise and vibration, air quality and socio-economics as part of the project development and has assessed each topic in the Environmental Statement.</p> <p>Potential impacts associated with widespread disruption to traffic flows and the public highway generally are considered within Volume 3, Chapter 8: Traffic and Transport (APP-071). No significant adverse impacts are identified during the construction phase.</p> <p>Potential impacts associated with noise and vibration are considered within Volume 3, Chapter 9: Noise and Vibration (APP-072). No significant adverse impacts are identified during the construction phase.</p> <p>Potential impacts associated with dust and fumes are considered within Volume 3, Chapter 10: Air Quality (APP-073). No significant adverse impacts are identified during the construction phase.</p> <p>Potential impacts associated with widespread disruption to locals and visitors including tourists are considered within Volume 4, Chapter 3: Socio-economics (APP-077). No significant adverse impacts are identified during the construction phase.</p>
RR-021.18	<p>4.0 The Onshore Power Transmittal Methodology</p> <p>4.1 Pylons</p>	<p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>4.1.1 The Promoter has dismissed pylons as a means of power transmittal simply on the grounds of "aesthetics" without adequate or indeed any consideration of other factors and advantages. Neither has the Promoter considered the use of existing pylons already in situ. The Promoter has also failed to consider a proposal whereby power transmittal could be partly by pylon and partly by underground cable. Evidence will be adduced to demonstrate how adopting a more open minded approach to these methodologies achieves a considerably better solution for all parties, including the Promoter, rather than the one currently proposed which is instead driven by Promoter convenience and maximizing rates of return.</p>	<p>considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
<p>RR-021.19</p>	<p>Underground Cables</p> <p>4.2.1 The Promoter's preference is for underground cables through previously undisturbed virgin lands largely within Conwy Council's "Special Landscaped Area".</p>	<p>The Applicant notes the concern regarding the locally designated Special Landscape Areas (SLAs). An assessment of effects on the special characteristics of the local landscape designations – Rhyd y Foel to Abergele SLA and Elwy and Aled Valleys SLAs – is contained within Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p> <p>The potential impact is assessed as a moderate adverse effect, which is considered not significant in EIA terms.</p>
<p>RR-021.20</p>	<p>4.2.2 However, due to issues with cables heating then the Promoter is limited in the capacity of cable that can be deployed underground thereby necessitating 4 cables which, the Objector is told will sterilize a 30Metre strip of their Property. Cables on pylons are open to the environment and the benefits of air cooling and so can carry a much higher capacity and so less cables and consequently, less easement width would be needed. The scale of the powers sought therefore go beyond that which is reasonably required to achieve the implementation of the Scheme.</p>	<p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
<p>RR-021.21</p>	<p>4.2.3 The Promoter claims that 1.5Gigawatts of electricity will be generated and this will require a transmittal cable capacity of 1.5MVA. They advise that this will be accommodated in 4 cables with considerable distances between them so that a large area of 30 metres in width is required for an easement and is land which will be sterilized by the scheme. However, the Statement of Reasons advises</p>	<p>Please see above Relevant Representation Response regarding the Mona Offshore Wind Project Transmittal Capacity (RR-021.4), Site Selection &amp; Consideration of Alternatives and Engineering Feasibility Assessment (RR-021.1-3) aspects for the detailed responses.</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>that a capacity of only up to 225- 275KVA will be provided for each of the 4 cables thereby only giving transmittal power of 1 M KVA or 1 GigaWatt. Underground cabling will therefore be a bottleneck in the amount of power that the current scheme can produce as well as stymie future upgrades which could easily be overcome had the Promoter considered an above ground pylon scheme.</p>	
RR-021.22	<p>4.2.4 Evidence will be adduced that effective alternative arrangements could be installed with the cables that can assist with for instance, venting and cooling, but other issues as well and increase the capacity of the cable runs that are there and again reduce the need for this excessive width of easement and consequent and unnecessary sterilization of the land.</p>	<p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons. This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
RR-021.23	<p>5.0 The Onshore Route Selection Locally and Impact on Objector</p> <p>5.1 Locally the cable travels from a North Westerly direction towards the A548 but crosses the B5381 into plot 06-100 in a gradual sweeping arc over the A548 and into the objector's land. Unnecessarily, the entirety of the Objector's frontage to the A548 (almost 290 meters) is within the Limits of Deviation and a similar amount to the frontage of plot 06-100. The cables splay out to take this 90 degree bend as slowly and gradually as they possibly can. However this is not a water or sewerage pipe or high pressure hydrocarbon or gas or some other hazardous liquid transmitted under pressure necessitating a gradual circumference. It is understood that electricity is quite able to endure sharp 90 degree turns and bends which would greatly lessen the impact in terms of amount of land affected on the objector's plots as well as on the neighbouring plots 06-100. A request to look into and amend this issue has been ignored by the promoter.</p>	<p>The Applicant has considered a number of factors when proposing the alignment (and therefore the potential land take) of the onshore cable route, as detailed in Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p> <p>The alignment of the proposed onshore cable route, where it passes under the A548 near the Objector's land, is not dictated by the cable design but by several other factors. The primary factor being the proposed trenchless crossing approach for road and utility crossings adopted by the Mona Offshore Wind Project. Trenchless drilling allows the Applicant to place a conduit under the roads in which a cable is then installed, without having to close them or place any constraint on the traffic flows during their installation. Trenchless drilling techniques have limits on the minimum radius that conduits can be installed and are constrained by ground conditions, conduit sizing and materials, and restrictions placed by third parties. As the power cables also have to be pulled into the conduit, the pulling tensions on the cables also need to be considered, so although cables can be laid to reasonably tight radii, they cannot be pulled through conduits with the same radii without putting excessive tension on the cables and causing damage.</p> <p>It is not the cable design that dictates the onshore cable route alignment across the A548 but the engineering design along with land and consent-based constraints.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-021.24	<p>5.2 The Objectors land has a special value to them arising from the unique potential not present or available to the parcels on the other 3 quadrants of Pen Yr Efail Crossroads.</p> <p>In an attempt to preserve that position a request was made that the Promoter positioned the cables so that they travelled slightly further to the south along plot 06-100 (the owner of which is understood to be in advanced discussions with the Promoter towards accepting the cables) and crossed to the south of Property and to the south of the pylons already in place there before resuming the route to the far south of the Objector's Property beyond the land already sterilised by the existing pylons. The response obtained on 11 /09/23 via the Promoter's agent's was: "that to go to the south of the line, we would need to cross an additional road and then be running parallel between the pylon route in your land and the one just to the south, which again would be very limiting." This demonstrates how the Promoter is aware of alternative arrangements but has not been prepared to consider them preferring to dismiss them out of hand merely due to their being slightly more commodious to itself. It has instead selected the Objector's property for convenience as well as commercial reasons rather than for compelling reasons in the public interest which outweigh the loss suffered by the affected party to whom no regard has been given.</p>	<p>The principle point of land value is not a matter for the Examination and will be addressed through direct negotiations. However, the point is noted, and the Applicant looks forward to receiving evidence testing to the value suggested through voluntary negotiations.</p> <p>As detailed in Response to Relevant Representation RR-021.23 "The Applicant has considered a number of factors when proposing the alignment (and therefore the potential land take) of the onshore cable route, as detailed in Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082)". Engineering constraints based on moving the route to the south of the northern set of pylons include:</p> <ul style="list-style-type: none"> <li>• Additional land requirements to the west of the A548 to accommodate the trenchless technique under the road. Moving the crossing point south also makes the angle for crossing the road more acute which will reduce engineering feasibility of the trenchless technique at this location and also increases the pulling tension on the cables due to a tighter horizontal radius which increases the risk of damaging cables during installation.</li> <li>• Moving the proposed Order Limits south at the crossroad would create road safety issues off the A548 into the compound due to the road alignment and the junction to the south.</li> <li>• From an electrical perspective, running the cable circuits between two parallel overhead lines is not advisable due to the potential of induced currents. The Applicant is also limited by the working areas for both lines identified in the protective provisions, so the net corridor width is not sufficient for construction purposes.</li> <li>• The design philosophy and industry practice are to cross exiting utilities at a perpendicular angle, the alignment chosen enables the Applicant to do this. If The Objectors proposed route was utilised, between the pylons there are additional existing utilities that would either have to be crossed at an acute angle or diverted to facilitate our works.</li> </ul> <p>If it has not been possible to avoid or reduce the impact on a particular landowner, then this has been because of the requirements for Engineering feasibility or to avoid potential impacts associated with environmental constraints, as demonstrated above.</p>
RR-021.25	<p>5.3 Insufficient evidence has been provided to demonstrate that this project will secure the most efficient and effective use of the Property which is unique in planning and amenity</p>	<p>The Applicant disagrees that insufficient evidence has been provided. A full explanation of the site selection and consideration of alternatives process is detailed within Volume 1, Chapter 4: Site Selection and Consideration of</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>terms enabling it to be deployed for a number of alternative options and uses not available to adjacent and neighbouring land. This will be to the detriment of the local community and economy.</p>	<p>Alternatives (APP-051). The Applicant will continue to work with the landowner regarding potential opportunities associated with the Property and looks forward to receiving evidence testing to the value suggested through voluntary negotiations.</p>
RR-021.26	<p>5.4 The Order, if confirmed, will sterilize not only the excessive route of the cable but also</p> <p>render the retained land sterile by virtue of the fact that it will be unfeasible to develop in isolation. This would not be the case if the transmittal route or methodology selected was different or in fact that requested small local changes had been taken seriously and accommodated.</p>	<p>The Applicant has sought to micro site the route where possible to accommodate landowner requests and has considered a number of factors when proposing the alignment (and therefore the potential land take) of the onshore cable route, as detailed within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051).</p> <p>However, due to several environmental constraints as listed above in the detailed response to RR-021.24, the following points can also be noted:</p> <ul style="list-style-type: none"> <li>• There are additional land requirements at the crossing to facilitate the trenchless technique design and to accommodate the proposed temporary construction compounds.</li> <li>• Regarding land sterilisation, the easement area will have limitations on what can be accommodated in the future, however development losses which can be evidenced as a direct result of the project, can be compensated for.</li> </ul>
RR-021.27	<p>6.0 Consultation</p> <p>6.1 In addition to the evidence of poor consultation and lack of any meaningful engagement beyond the minimum necessary lip service believed to be necessary to secure these draconian powers, the Promoter has sought to discourage and disincentivise proper debate at Public Inquiry by declining to produce hard copies of the documents to statutory objectors. The DCO notice received on 26 March 2024 advised as follows: "Provision of hard copies of the ES will be subject to a maximum charge of £7,000, plus VAT, to cover printing and delivery costs." One of the Objectors is in their late 80's unable to drive and with vision difficulties and unable to read a computer screen and yet the Promoter expects her to travel to either Llandudno or Rhyl in order to inspect hard copies of the document as the Promoter's charges for them are simply prohibitive.</p>	<p>The Applicant is a responsible developer committed to listening to the views of stakeholders including landowners and members of the local community. Statutory consultation is a key part of the planning process, one which the Applicant took seriously; a Consultation Report was submitted with the DCO application (APP-037) explaining how the Applicant complied with the pre-application consultation requirements set down in the Planning Act 2008 and had regard to all the feedback submitted.</p> <p>From the outset, the Applicant promoted a digital-first consultation and designed a project website that is easily accessible to a wide range of users. That said, the Applicant consulted using a variety of methods to help explain the proposals and encourage people to provide their comments. Community focused materials included a consultation postcard, website, brochure and a non-technical summary of the PEIR (PEIR NTS). The Applicant also organised a series of consultation events, located at accessible public locations, where a full copy of the PEIR was available for reference, as well as large scale maps with further details on the locations for attendees to view and discuss. Project 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.</p>



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Reference	Relevant Representation Comment	Applicant's response
		<p>USB sticks containing the PEIR, and printed copies of the PEIR NTS and the Consultation Brochure were available to take away.</p> <p>When the Applicant's application for a DCO was accepted the digital-first approach continued, with all documents available on the project's pages on the National Infrastructure Planning website. With the volume of the full suite of documents in the many thousands of pages, the Applicant's Section 56 notification offered assistance to anyone with accessing the documents relevant to them: "If you require an alternative method for inspection of the DCO application or have any queries, including how to access the documents on the Planning Inspectorate's website, please call the Applicant on 0800 860 6263 or email <a href="mailto:info@monaoffshorewind.com">info@monaoffshorewind.com</a>."</p> <p>Again, due to the volume of the full suite of documents, and with particular reference to the Applicant's commitment to the environment and sustainability, it was deemed reasonable to charge a fee for printed materials: "The Applicant can also provide any of the documents as required on a USB (free of charge). Hard copies of the NTS can also be provided upon reasonable request. Provision of hard copies of the ES will be subject to a maximum charge of £7,000, plus VAT, to cover printing and delivery costs."</p> <p>The Applicant considers its commitments to aiding people with the use of resources to be more than reasonable.</p> <p>The Applicant received requests for printed copies of all DCO application documents from the representative of the four named respondents. Following a discussion with said representative about the volume of documents that makes up the DCO application, the Applicant offered a view on which documents it thought would be of most relevance (Works Plan - Onshore, Land Plan, Statement of Reasons and the Site Selection BRAG chapter) and offered to send hard copies of these free of charge.</p> <p>The representative responded stating this "may be a sensible compromise" and requested that the Applicant initially forward a link to the pdf of the Statement of Reasons (APP-029) and a list of all the documents in the document library in pdf format for perusal. These links were shared, and at time of writing, no further response had been received.</p>
RR-021.28	<p>7.0 Conclusion</p> <p>7.1 The Promoter has not demonstrated that it has fully considered the impact that the Order and the use of this</p>	<p>The Applicant has demonstrated through the site selection and consideration of alternatives process (as outlined in Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) and supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>Land will have upon the landowners and its current and future plans.</p> <p>7.2 Any potential public benefit resulting from the use of all or part of this land does not outweigh the harm, which would be caused to the Objectors.</p> <p>7.3 It is clear that in choosing to locate the cables on the Objector's land then the Promoter has merely paid lip service to the Objector's issues and instead has ploughed on regardless not due to the "compelling case in the public interest" or "indispensable" nature of the land to the scheme but rather due to general and commercial convenience and desirability in furtherance of its private profit. Better alternative routes and solutions have been dismissed out of hand due to the Promoter's assumption that the draconian powers it seeks will be granted to it as a matter of course. This is unfair.</p>	<p>4.2: Site Selection BRAG Report annex (APP-082)) that a rigorous and robust process has been followed.</p> <p>Decisions made by the Applicant in response to consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible. If it has not been possible to avoid or reduce the impact on a particular landowner, then this has been because of the requirements for engineering feasibility or to avoid potential impacts associated with environmental constraints.</p> <p>The Applicant continues to seek voluntary agreement for the rights sought.</p>
RR-021.29	<p>7.4 The alternatives that are referred to in section 4.0 (to be evidenced further at Inquiry) would each enable the Objectors to withdraw these objections. The suggestions in Section 5.0 (to be evidenced further at Inquiry) would alleviate the strength of the Objectors' objections. Each alternative deserves a proper robust investigation and the Promoter put to strictly evidence why they have not considered them.</p> <p>7.5 The Objectors therefore request to have their objections treated as a Statutory Objections and be given the opportunity to air their views to the proposal at a Public Local Inquiry where the issues they raise can be given a fair hearing by the Inspector who will duly report to the Secretary of State having proper regard to the need to strike a fair balance between weighing up whether the public benefit is sufficiently significant to outweigh the damaging impact of the taking of interest this land or, on the other hand, whether the land's inclusion in the Order has merely been for the convenience of and desirability of the Promoter's return on investment.</p>	<p>The Applicant has considered each of the alternatives raised by the Objector within Section 4.6.2, Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051); supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082)).</p> <p>The Applicant notes the objection and welcomes the opportunity to discuss these matters further through the Examination process.</p> <p>The Applicant will continue to seek voluntary agreement for the rights sought.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-021.30	<p>Kindly keep us informed of progress with the DCO and the Public Inquiry process.</p> <p>Yours faithfully</p> <p>Mrs H M Parry</p> <p>Mr R W Parry</p> <p>Mr G W Parry</p> <p>Mrs E W Wade</p>	<p>Noted by the Applicant and we will continue to engage.</p>

## 2.22 Gary Johnston

Table 2.22: RR-022 – Gary Johnston

Reference	Relevant Representation Comment	Applicant's response
RR-022.1	<p>Whilst I agree in principle for this, and the Awel Y Mor wind farm, my concern is the impact the construction and additional traffic in my area of [REDACTED] From the maps and documents I have seen posted along routes etc, it appears that the proximity to my property of this added traffic will come quite close. I would like to know what impact this will have on the local residents of [REDACTED] and nearby properties. [REDACTED] is a small village, which already has increasing traffic numbers to which this extra traffic will be a major cause of concern.</p>	<p>Notwithstanding the redaction, the Applicant is able to respond to the specific points made in your Relevant Representation.</p> <p>The proposed access routes for construction traffic are identified in Volume 7, Annex 8.7: Traffic and Transport Figures (APP-177). The works near Engine Hill as shown on the Work Plan -Onshore (APP-008) comprise road widening to allow for the movement of HGVs and cable drum vehicles. Volume 3, Chapter 7: Traffic and Transport (APP-070) predicts there will be a 5% change in daily traffic flows along the nearest road link as a result of construction traffic associated with the Mona Offshore Wind Project. This change in flow is below the threshold set out in IEMA guidance requiring assessment of environmental effects such as driver delay, The overall effect is negligible. The Applicant is aware of community and resident concerns regarding traffic. Measures to manage construction traffic will be implemented in accordance with the Construction Traffic Management Plan (APP-225) which forms part of the Code of Construction Practice (CoCP). The CoCP (Outline CoCP (APP-212)) is secured by DCO requirement.</p>

## 2.23 GTC

Table 2.23: RR-023 – GTC

Reference	Relevant Representation Comment	Applicant's response
RR-023.1	Dear Sir/Madam, Thank you for your email and letter you sent to GTC Pipelines Ltd. Please take this as confirmation that GTC has no existing apparatus within the order limits or planned work areas of this scheme and therefore no objections to scheme. If you require any further information or have any queries, please do not hesitate to contact us.	The Applicant notes this response.

## 2.24 H L & RJL Evans

Table 2.24: RR-024 – H L & RJL Evans

Reference	Relevant Representation Comment	Applicant's response
RR-024.1	I want the opportunity to provide comments on the draft DCO, book of reference, environmental statement together with other documents and items.	The Applicant notes the representation and welcomes the comments on the documents listed once the interest has had an opportunity to review. The Applicant will continue negotiations of the heads of terms and associated option agreements.

## 2.25 Health and Safety Executive

Table 2.25: RR-025 – Health and Safety Executive

Reference	Relevant Representation Comment	Applicant's response
RR-025.1	<p>CEMHD5 Contribution to Consultation Will the proposed development fall within any of HSE's consultation distances? With reference to the Redlined (Mona Onshore Order Limits MO_PRJ_BP_0162_Rev11) areas shown on drawings Location Plan(s) – Onshore Plan Sheets 0 – 11 (inclusive) found in document [MONA OFFSHORE WIND PROJECT, Location Plan, Document Number: MOCNS-J3303-RPS-10008, Document Reference: B1, APFP Regulations: 5(2)(i), February 2024, F01], there are a number of Major Accident Hazard Pipeline(s) and Major Hazard Installation(s): Major Accident Hazard Pipeline(s) Brookes Farm / Llanelian Road (HN009 Part 2a) [HSE Ref: 4130012, Ref: Transco 1895] - Wales and West Utilities Bodfari / Rhosgoch (VN082) [HSE Ref: 7610, Transco Ref: 1862] - Wales and West Utilities Pilkingtons Branch (HN017) [HSE Ref: 7646, Transco Ref: 1897] - Wales and West Utilities Major Hazard Installation(s) Glascoed Road, St Asaph, North Wales, LL17 0LL [HSE ref: H3668] There is currently insufficient information available for HSE to provide its' public safety Land Use Planning Advice**. However, by way of general guidance, HSE would not advise against the proposed development providing no population(s), either temporary or permanent, is introduced within any of HSE's public safety zones. ** HSE's Land Use Planning Methodology [https://www.hse.gov.uk/landuseplanning/methodology.htm] Should a new Major Accident Hazard Pipeline be introduced, or existing Pipeline modified prior to the determination of the present application, the HSE reserves the right to revise its advice. If prior to the determination of the present application, a Hazardous Substances Consent be granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard Installation in the vicinity of the proposed project, the HSE reserves the right to revise its advice. Would Hazardous</p>	<p>The Applicant notes the HSE's response. The crossing locations along the Onshore Cable Corridor are shown in Volume 5, Annex 4.3: Onshore Crossing Schedule (APP-083) Where the Mona Onshore Cable Corridor or its access roads are required to cross Major Accident Pipelines or Major Hazard Installations, construction activities will be undertaken in accordance with the final protective provisions of the DCO. The locations of these crossings are identified in the Volume 5, Annex 4.3: Onshore Crossing Schedule (APP-083). The Applicant will continue to engage with the Health and Safety Executive via the Construction, Design and Management (CDM) Regulations (2015) during the detailed design phase and welcomes HSE to provide its' public safety Land Use Planning Advice during this period.</p> <p>It is not envisaged that a Hazardous Substances Consent (under Planning (Hazardous Substances) Act 1990) will be required for the construction, operation and maintenance or decommissioning of the Mona Offshore Wind Project.</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>Substances Consent be needed? The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) (Wales) Regulations 2015. Hazardous Substances Consent would be required if the site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations. Further information on HSC should be sought from the relevant Hazardous Substances Authority.</p>	



## 2.26 Hefin Williams

Table 2.26: RR-026 – Hefin Williams

Reference	Relevant Representation Comment	Applicant's response
RR-026.1	I am registering an interest as the cables are crossing my land	The Applicant is aware of the interest and will continue to engage with Hefin Williams and his appointed agent regarding the land rights being sought throughout the examination.

## 2.27 Heneb: Clwyd-Powys Archaeology

Table 2.27: RR-027 – Heneb: Clwyd-Powys Archaeology

Reference	Relevant Representation Comment	Applicant's response
RR-027.1	Heneb: Clwyd-Powys Archaeology are the organisation who cover the onshore aspects of the project from an archaeological point of view. We have been involved with the process as Clwyd-Powys Archaeological Trust up until the merger on April the 1st this year. We will make recommendations on the proposed onshore route and structures, liaising with the onsite contractors.	The Applicant notes your response and will continue to liaise with Heneb: Clwyd-Powys Archaeology as part of the Archaeology and Heritage Engagement Forum.

## 2.28 Heneb: Gwynedd Archaeology

Table 2.28: RR-028 – Heneb: Gwynedd Archaeology

Reference	Relevant Representation Comment	Applicant's response
RR-028.1	On 1st April 2024, the four Welsh Archaeological Trusts merged to form a single organisation, called Heneb. The planning advice section of Heneb:Gwynedd Archaeology (formerly Gwynedd Archaeological Planning Service) has been invited as a statutory consultee to register as an interested party for the above application (letter received by post from EnBW 8th April 2024).	The Applicant notes your response.
RR-028.2	We were involved in early stage consultations in our capacity as archaeological advisor to the local planning authorities of north-west Wales (Gwynedd, Isle of Anglesey, Eryri National Park Authority, and the western part of Conwy). At that stage, all terrestrial and intertidal works fell outside our geographical area.	The Applicant notes your response.
RR-028.3	As of 1st April 2024, Heneb:Gwynedd Archaeology has acquired curatorial responsibility for the whole of Conwy county. As such, the landfall site and cable connections now fall within our remit. We would therefore request to be added to the Archaeology and Heritage Engagement Forum (AHEF) – Onshore so that we are included in relevant future discussions and correspondence.	The Applicant notes your response. The Applicant will invite Heneb: Gwynedd Archaeology to future AHEF meetings.

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Reference	Relevant Representation Comment	Applicant's response
RR-028.4	<p>The archaeological planning advisor at Heneb:Clwyd-Powys Archaeology who has been advising on this scheme has been on extended sick leave since 1st March 2024. Consequently we have not had the opportunity to discuss this scheme and coupled with the above recent changes, have had limited time to review scheme documents independently. We note however that regular detailed discussions have been held about the approach to onshore archaeology and that consultees have been satisfied with the approach taken to date. We do not presently feel in a position to be able to provide informed comments on the scheme or the submitted documents and would request the opportunity to submit a detailed representation when we have reviewed the submitted information.</p>	<p>The Applicant notes your response and looks forward to receiving your detailed representation.</p>
RR-028.5	<p>We anticipate that we will be providing comments on the following points, insofar as they relate to works and historic assets within Conwy county (and, whilst the Heneb:Clwyd-Powys Archaeology advisor is absent, within Denbighshire) landward of mean low water springs (MLWS):</p> <ul style="list-style-type: none"> <li>• the scope and adequacy of archaeological assessment and evaluation</li> <li>• the assessment of impacts presented in the Environmental Statement</li> <li>• the suitability of proposed further investigation, mitigation and/or enhancement measures, including the draft Outline Onshore Written Scheme of Investigations</li> <li>• the suggested wording for proposed conditions or other means of securing such works</li> </ul> <p>the content of the OLEMP, OCoCP and other scheme documents as they pertain to archaeology</p>	<p>The Applicant notes your response and looks forward to your detailed representation.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-028.6	<p>We note that it was not possible to undertake the majority of the agreed trial trenching programme in autumn 2023, with the intention that this would be resumed early in 2024, with results to be submitted during the Examination period if available. We would be grateful for an update on this programme. If it would be helpful, we would welcome a meeting with the project team to bring us up to speed on progress to date and proposed forward strategy.</p>	<p>The trial trenching survey was undertaken between September and October 2023. A total of 75 trenches out of the 284 trenches were excavated during this phase of works, many of which were targeted on geophysical anomalies identified from the geophysical survey (Volume 7, Annex 5.3: Onshore Geophysical Survey Report Part 1 and Part 2 (APP-145 and APP-146)). This phase of trial trenching was used to inform the baseline for Volume 3, Chapter 5: Historic Environment (APP-068). The Applicant believes that the baseline obtained is adequate to inform the impact assessment.</p> <p>Further trial trenching was planned to take place, however not all be completed due to access restrictions and bad weather conditions. Clwyd-Powys Archaeological Trust (now Heneb: Clywd-Powys Archaeology) were actively consulted during the planning of the survey and been consulted as part of the trench closure process during the survey. The interim results of the survey are reported in Volume 7, Annex 5.5: Trial Trenching Report Part 1 and Part 2 (APP-148 and APP-149).</p> <p>The re-mobilisation of the trial trenching survey commenced in June 2024 and has engaged directly with Heneb: Gwynedd Archaeology as part of the trench closure process. As such, Heneb: Gwynedd Archaeology are made aware of any archaeological finds as they are discovered.</p> <p>The Applicant does not see a need for the results of the post-application trial trenching to be submitted into the Examination in order to demonstrate the adequacy of the baseline obtained as part of the historic environment impact assessment.</p>

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**2.29 Iwan Roberts**

**Table 2.29: RR-029 – Iwan Roberts**

Reference	Relevant Representation Comment	Applicant's response
RR-029.1	I am a progressive dairy farmer and crop and graze the land within plots 06-101 to 06105 inclusive which are affected by cables for the Mona Offshore windfarm. I have held it on grazing licence for in excess of 15 years although more recently and currently I occupy the land under a farm business tenancy. I wish to object to the installation of these cables on this land for the following reasons:	The Applicant notes the representation and will continue to engage with Iwan Roberts regarding the disturbance and accommodation works for the land.
RR-029.2	1) This is some of the most productive land that I farm and is extremely conveniently located to my main holding ideal for cropping and spreading manure – its loss even temporarily will not be limited to the immediate income it generates but will necessitate a review of my business and likely a downsizing of the herd or youngstock followers to the detriment of herd genetics and the wider long term business.	The Applicant will continue to engage with Mr Roberts to further understand and mitigate losses where possible as a result of the Mona Offshore Wind Project. Heads of terms have been issued for the consent required from the tenant of the land and the project will progress the negotiations throughout examination.
RR-029.3	2) The extent of the land taken is vastly beyond what is necessary to build the scheme and the inevitable extreme disruption to the land in terms of topsoil subsoil mixing, compaction and general damage to soil structure on this heavy clay soil which will inevitably render it much less productive than before.	<p>The design of the Mona Offshore Wind Project has been refined following the statutory consultation to reduce the extent of land take required (see ES Volume 4, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). In addition to the land take required for the Mona Offshore Wind Project infrastructure, land is also required for ecological and landscape mitigation to meet national policy requirements (e.g. Planning Policy Wales Edition 12).</p> <p>Where land take is required for construction, measures will be implemented to minimise damage to soil resources. Construction activities will be undertaken in accordance with the final Soil Management Plan. The Plan will be based on the principles set out in the Outline Soil Management Plan (APP-220) and will include measures for the stripping and storage of topsoil and subsoil; measures to avoid mixing of soils and to avoid damage through handling in unsuitable conditions; measures for soil restoration; and monitoring requirements. The Plan forms part of the Code of Construction Practice (CoCP), which is secured under Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03). The final Soil Management Plan will be prepared during detailed design and will be agreed with the relevant planning authority.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-029.4	3) A substantial amount of drainage has been installed on the land in the last 5 years which will be rendered obsolete by the disruption proposed by installing these cables	<p>Prior to the commencement of construction, site preparation works will be undertaken to provide detailed information on existing ground conditions. These works will include drainage surveys to identify the location and type of field drainage system.</p> <p>Pre-construction drainage will be installed to intercept existing land drains and divert water away from the working area where possible and to maintain existing drainage flows. Any field drainage intercepted during construction will be reinstated or diverted to a secondary channel following completion of the construction process.</p> <p>The management of surface water runoff during construction and the reinstatement of drainage systems will be implemented in accordance with the principles set out in the Outline Construction Surface Water Drainage Management Plan (APP-218). The Outline Surface Water Drainage Management Plan is secured under Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03). The final Construction Surface Water Drainage Management Plan will be prepared during detailed design and will be approved by the relevant planning authority.</p>
RR-029.5	4) The proposals will reduce a highly productive block of land of some 23 acres to 2 separate severed areas of about 4.25 acres each. No provision for access to these areas has been made which will be uneconomic to farm in any event.	<p>The Applicant will work with Mr Roberts and the landowner to identify and agree suitable crossing points where possible to provide access to any severed land during accommodation works discussions. Engagement is ongoing and will continue to ensure that suitable measures in accordance with the Outline Soil Management Plan will be in place for severed land throughout the construction process.</p>
RR-029.6	5) No provision has been made for any stock and cropping accommodation works which will be required at all times to ensure that livestock and crops will be safely and securely enclosed and watered at all times with adequate access.	<p>The Applicant will continue to engage with Mr Roberts regarding accommodation works through the construction of the project.</p>
RR-029.7	6) It would be preferable if the cables could be routed a different way and on less productive land or even better on poles or pylons which would minimize the overall disruption altogether. Please can Mona Offshore consider these alternatives to avoid the impact on me.	<p>The Applicant has undertaken a rigorous and robust site selection process in relation to the onshore cable route for the Mona Offshore Wind Project.</p> <p>A full reasoning and justification for the selection of the onshore cable route is provided in Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). This is also supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>The optimum route for an onshore grid connection is generally considered to be the shortest route from A to B from landfall to Bodewyddan National Grid Substation. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore cable route.</p> <p>Decisions made by the Applicant in response to landowner and consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible.</p> <p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons. This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>



## 2.30 J Bradburne Price & Co

Table 2.30: RR-030 – J Bradburne Price & Co

Reference	Relevant Representation Comment	Applicant's response
RR-030.1	I want the opportunity to provide comments on the draft DCO, book of reference, environmental statement together with other documents and items.	The Applicant notes the representation and welcomes the comments on the documents listed once the interest has had an opportunity to review. The Applicant will continue negotiations of the heads of terms and associated option agreements.

## 2.31 James Wilson

Table 2.31: RR-031 – James Wilson

Reference	Relevant Representation Comment	Applicant's response
RR-031.1	Curious about the impact of this and other associated developments, individually and in the cumulative sense, in terms of the effect on pre-existing users of the same marine space, associated environmental values and other possible future uses. The areas described within this application and indeed already occupied by Offshore renewables within the Central Irish sea, are geographically very large / extensive, and will invariably have some adverse effect	Potential impacts on the marine ecological environment are presented in Volume 2, Chapters 1 to 5 (APP-053 to APP-057). Potential impacts on the marine human environment are presented in Volume 2, Chapters 6 to 10 (APP-058 to APP-062). Each chapter includes a cumulative effects assessment that takes into account the potential impact of the project alongside other projects and plans, including foreseeable future activities. The Non-Technical Summary of the Environmental Statement (APP-047) provides a useful overview of the results of the Environmental Impact Assessment (EIA) for the Mona Offshore Wind Project alone and cumulatively with other projects, plans and activities within the same region.

## 2.32 Jennings Building & Civil Engineering Limited

Table 2.32: RR-032 – Jennings Buildings & Civil Engineering Limited

Reference	Relevant Representation Comment	Applicant's response
RR-032.1	<p>In capacity of agent for our client (being in respect of Owners / Occupiers of land proposed to be affected by the intended scheme ) I anticipate the potential need to submit representations on ,for instance -:</p> <ul style="list-style-type: none"> <li>• The draft Development Consent Order</li> <li>• The Book of Reference</li> <li>• The Outline landscape &amp; Ecology Management Plan</li> <li>• The Outline Construction Fencing Plan</li> <li>• Outline Soil Management Plan</li> <li>• The Tree &amp; Hedgerow Plan</li> <li>• The Published Soils &amp; Agricultural Land classification Data Technical Report</li> <li>• The Outline Biosecurity Protocol</li> <li>• Matters applying to construction /installation of cables and ancillary apparatus.</li> <li>• Mitigating damage and land reinstatement methodology.</li> </ul>	<p>The Applicant notes the representation and will continue to engage with DMPC and their client on those items set out in the representation through the course of the examination and through negotiations of the heads of terms and associated option agreements.</p>

## 2.33 Joint Nature Conservation Committee

Table 2.33: RR-033 – Joint Nature Conservation Committee

Reference	Relevant Representation Comment	Applicant's response
RR-033.1	<p>JNCC would like to register as an interested party for the Mona Offshore Wind Farm DCO application/examination. JNCC are statutory advisors to the UK Government and devolved administrations on issues relating to nature conservation in UK offshore waters (beyond the territorial limit). Our key areas of interest are birds, marine mammals and benthic receptors, as well as Marine Protected Areas, which may be impacted by the Mona Offshore Wind Project. Below we include our advice in relation to the above project, which we will separately submit to <a href="mailto:monaoffshorewindproject@planninginspectorate.gov.uk">monaoffshorewindproject@planninginspectorate.gov.uk</a>. Mona Offshore Wind Project Development Consent Order Application – Environmental Statement and Management Plans – EN010137 Thank you for consulting JNCC on the Mona Offshore Wind Project Development Consent Order (DCO) Application including the Environmental Statement (ES) and Management Plans. Notification of acceptance for examination by the Secretary of State for Energy Security and Net Zero was received on 2 April 2024. The advice contained within this minute is provided by JNCC as part of our statutory advisory role to the UK Government and devolved administrations on issues relating to nature conservation in UK offshore waters (beyond the territorial limit). We have subsequently concentrated our comments on aspects of the documents that we believe relate to offshore waters and defer to comments provided by Natural Resources Wales Advisory (NRW-A) for aspects relating to inshore waters.</p>	<p>The Applicant notes JNCC's response. JNCC have been included in the pre-application consultation for the Mona Offshore Wind Project. JNCC were consulted with as a statutory body as part of the statutory consultation. Responses to the feedback received are presented in Consultation Report Appendices - Part 3 (D.25 to F) (APP-040). JNCC has been included in the Evidence Plan process through the benthic ecology, fish ecology and physical processes expert working group (EWG), the marine mammals EWG and offshore ornithology EWG as presented in the Technical Engagement Plan (APP-041).</p>
RR-033.2	<p>The advice below relates to marine ornithology, marine mammals, and offshore benthic ecology and is captured under the following headings: ? Overarching comments on the Environmental Statement ? Marine ornithology comments ? Marine mammal comments ? Benthic ecology</p>	<p>The Applicant notes JNCC's response.</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>(offshore) Overarching comments on the Environmental Statement The following documents were reviewed in providing this response: Environmental Statement: ? Volume 1, Chapter 3: Project Description ? Volume 1, Chapter 5: Environmental Impact Assessment Methodology ? Volume 2, Chapter 1: Physical Processes ? Volume 2, Chapter 2: Benthic subtidal and intertidal ecology ? Volume 2, Chapter 4: Marine mammals ? Volume 2, Chapter 5: Offshore ornithology ? Volume 2, Chapter 11: Inter-related Effects – Offshore ? Volume 5, Annex 3.1: Underwater sound technical report ? Volume 5, Annex 5.1: Cumulative effects screening matrix ? Volume 5, Annex 5.2: Transboundary impacts screening. ? Volume 6, Annex 1.1: Physical Processes Technical Report ? Volume 6, Annex 2.1: Benthic Subtidal and Intertidal Ecology Technical Report ? Volume 6, Annex 4.1: Marine mammal technical report ? Volume 6, Annex 5.1: Offshore ornithology baseline characterisation report ? Volume 6, Annex 5.2: Offshore ornithology displacement technical report ? Volume 6, Annex 5.3: Offshore ornithology collision risk technical report ? Volume 6, Annex 5.5: Offshore ornithology apportioning technical report ? Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report ? Volume 8, Annex 2.2: Climate change risk assessment Habitat Regulations Assessment (HRA): ? Stage 1 Screening report ? Stage 2 Information to support an Appropriate Assessment ? Part 1, Introduction and background ? Part 2, Special Areas of Conservation (SAC) assessments ? Part 3, Special Protection Areas and Ramsar sites Assessments ? HRA integrity matrices ? Marine Conservation Zone Screening Report Offshore Plans: ? Mitigation and monitoring schedule ? Outline underwater sound management strategy ? Outline offshore operations and maintenance plan ? Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels ? Outline marine mammal mitigation protocol ? Offshore In-Principle Monitoring Plan ? Mona Array Area – Site Characterisation Report ? Offshore Cable Corridor Site Characterisation Report.</p>	

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Reference	Relevant Representation Comment	Applicant's response
RR-033.3	<p>Throughout the Environmental Statement and DCO documentation there is little distinction between inshore and offshore, distinguished by the 12nm/territorial waters limit. Given the remit of Statutory Nature Conservation Bodies (SNCBs) is divided based on this factor it would be helpful to have impacts broken down into these remits. In particular, it would have been useful to have this delineation identified on all the maps provided.</p>	<p>The Applicant has considered the Mona Offshore Wind Project as a whole and has not divided the assessment of potential impacts by stakeholder remit or geography. The 12nm limit, in particular, does not align with a natural boundary for the Mona Offshore Wind Project, as, for example, this would split the offshore cable route. Where potential impacts or parameters have been further delineated, they have been divided by the applicable consenting process (i.e. by parameters to be secured under the draft DCO Requirements and deemed marine license and those to be secured under the standalone marine licence). The Applicant notes that JNCC did not raise this point in their s42 feedback on the PEIR.</p> <p>The 12 nm limit for inshore waters is marked on figures in a number of chapters including figure 1.1 Volume 1, Chapter 1: Introduction and overarching glossary (APP-048), figure 3.2 Volume 1, Chapter 3: Project description (APP-050), figure 4.1 of Volume 1, Chapter 4: Site selection and consideration of alternatives (APP-051), figure 1.1 of Volume 2, Chapter 1: Physical processes (APP-053), figure 2.1 of Volume 2, Chapter 2: Benthic, subtidal and intertidal ecology (APP-054) and the Location Plan (APP-006). Considering the aforementioned reasons, no further delineation of plans is proposed.</p>
RR-033.4	<p><b>Marine ornithology comments</b></p> <p>The following documents were reviewed in providing this response: Environmental Statement: ? Volume 2, Chapter 5: Offshore ornithology ? Volume 6, Annex 5.1: Offshore ornithology baseline characterisation report ? Volume 6, Annex 5.2: Offshore ornithology displacement technical report ? Volume 6, Annex 5.3: Offshore ornithology collision risk technical report ? Volume 6, Annex 5.5: Offshore ornithology apportioning technical report ? Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report HRA: ? Stage 1 Screening report ? Stage 2 Information to support an Appropriate Assessment ? Part 3, Special Protection Areas and Ramsar sites Assessments ? HRA integrity matrices</p>	<p>The Applicant welcome JNCC's review and comments below.</p>
RR-033.5	<p>Overall comments We disagree with several elements of the assessment to offshore ornithology within the ES and the HRA. In addition, there are multiple errors within the tables and text, and errors when using values in subsequent stages of the assessment. Many aspects of the assessment are difficult to follow what has been done or where values</p>	<p>The Applicant has responded in the table below in relation to the specific points raised by JNCC.</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>have come from. Due to these disagreements, errors, and lack of clarity, we do not have confidence in the results, nor are we able to agree with the overall conclusions, either within the EIA or the HRA, particularly with regards to Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro Special Protected Area (SPA).</p>	
RR-033.6	<p>Aspects of JNCC advice appear to have been misinterpreted, for instance foraging values and agreements and disagreements on breeding Biologically Defined Minimum Population Scales (BDMPS) reference populations.</p>	<p>The Applicant acknowledges JNCC's comment. The Applicant has provided a detailed response to specific points raised by JNCC (for example, related to BDMPS reference populations) below.</p>
RR-033.7	<p>Some aspects of JNCC advice also appear to have been taken on board in some circumstances, then not taken on board in other circumstances, despite being agreed to during pre-application meetings and correspondence. For instance, using a range of displacement rates in the ES, but specific displacement rates being used in the HRA.</p>	<p>The Applicant has presented the range of values for displacement (minimum, most scientifically robust value and maximum) in Volume 2, Chapter 5: Offshore ornithology (APP-057) together with the associated predicted increase in baseline mortality (e.g., table 5.23 for common guillemot). The most scientifically robust value is based on a review of evidence-based displacement and mortality rates provided in section 5.7.2 of Volume 2, Chapter 5: Offshore ornithology (APP-057). The assessment is based on the most scientifically robust value, but the range of impacts is also presented within Volume 6, Annex 5.5: Offshore ornithology displacement technical report (APP-092).</p> <p>However, the Applicant acknowledges that the minimum impact value (from the lowest displacement and mortality rates) has been taken forward in the HRA. This occurred in error, and the displacement and mortality impact value used within Volume 2, Chapter 5: Offshore ornithology (APP-057) should have been represented. However, in light of this discrepancy, the Applicant can confirm that no additional site within Step 1 (Section 5 of HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites assessments [APP-032]) would have been taken forward to Step 2 (of (APP-032)) if the impact used in the Volume 2, Chapter 5: Offshore ornithology (APP-057) was assessed. This will be included in the Errata document submitted at Deadline 1 assessed. This will be included in the Errata document submitted at Deadline 1</p> <p>If the Applicant had used the impact values from Volume 2, Chapter 5: Offshore ornithology (APP-057), no change to the conclusions presented in HRA Stage 2</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-033.8	<p>We advise that the below disagreements, errors, and unclear aspects are addressed through submission of revised documents related to offshore ornithology. We have identified errors to the best of our ability with the time available, but this may not be an exhaustive list of all errors, and we recommend that a full and thorough check of all tables and in-text values is conducted. JNCC can only comment on sites for which we have jurisdiction (UK marine sites wholly or partly in waters beyond 12nm). We note that NRW and Natural England (NE) have been involved in pre-application discussions and defer to those agencies on their respective sites. We also note that a number of SPAs in Irish and Scottish waters are screened in at Likely Significant Effect (LSE) and recommend consultation with the relevant nature conservation advisers.</p>	<p>Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites assessments (APP-032) would occur.</p> <p>The Applicant welcomes JNCC's comments and review. In light of JNCC's specific comments, the Applicant has provided responses to each of these below.</p>
RR-033.9	<p><b>Volume 2, Chapter 5: Offshore ornithology</b></p> <p>We disagree with the use of the term 'JNCC avoidance rates', or similar, to describe the Ozsanlav-Harris report. Although Ozsanlav-Harris et al. (2023) is a JNCC report, it does not in itself constitute our recommended avoidance rates. Referring to it as 'JNCC avoidance rates' incorrectly gives the message that JNCC advise use of every number in the report as it appears, which is not necessarily the case. Our advice on implementation of the results of Ozsanlav-Harris et al. (2023) is included in the joint SNCB guidance note on Collision Risk Modelling (CRM). This uses the rates from Ozsanlav-Harris et al. (2023), but species grouping is an important aspect of this. This information is contained within advice which Natural England provided on 7 July 2022 directly to the Applicant and is also used. Those rates should be regarded as and named joint SNCB avoidance rates, whilst the Ozsanlav-Harris et al. (2023) should be named as Ozsanlav-Harris et al. (2023) rates. This has been iterated to Mona Offshore Wind during the Expert Working Group (EWG) several times, for example during the 6th</p>	<p>The Applicant acknowledges that species group avoidance rates presented in Ozsanlav-Harris <i>et al.</i> (2023) are incorrectly referred to as "JNCC avoidance rates" within certain documents, specifically Volume 2, Chapter 5: Offshore ornithology (APP-057) and Volume 6, Annex 5.5: Offshore ornithology apportioning technical report (APP-095). Due to this discrepancy being one of semantics, there is no impact on the assessment presented nor on the conclusions drawn. This will be included in the Errata document submitted at Deadline 1.</p>



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Reference	Relevant Representation Comment	Applicant's response
	<p>Ornithology EWG held on 19 October 2023, and within JNCC comments provided on 23 November 2023 on the minutes of the 6th Ornithology EWG. The applicant's response to JNCC comments on the minutes of the 6th Ornithology EWG meeting state "Applicant response: Thank you – we have updated the reference throughout our documents" yet clearly this is not the case. This comment also applies to the HRA Integrity Matrices document and Volume 6, Annex 5.5: Offshore ornithology apportioning technical report.</p>	
<p>RR-033.10</p>	<p>Table 5.13 and Table 5.14: Seasonal definitions differ across tables and documents, so it is not clear which is being used in each circumstance it is used.</p>	<p>The Applicant considered the biologically defined minimum population scales (BDMPS) bio-season from Furness (2015) where relevant and provided a rationale for any variation from the BDMPS bio-season in the technical reports. Table 5.13 in Volume 2, Chapter 5: Offshore ornithology (APP-057), table 1.3 in Volume 6, Annex 5.1: Offshore Ornithology baseline characterisation technical report (APP-091) and table 1.3 in Volume 6, Annex 5.2: Offshore ornithology displacement technical report (APP-092) present the bio-seasons defined in Furness (2015). These bio-seasons have been refined by the Applicant and presented in table 5.14 in Volume 2, Chapter 5: Offshore ornithology (APP-057), table 1.4 in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report (APP-091) and in table 1.3 of Volume 6, Annex 5.2: Offshore ornithology displacement technical report (APP-092)</p> <p>The Applicant has noted a discrepancy regarding the non-breeding season for Atlantic puffin in table 5.14 in Volume 2, Chapter 5: Offshore ornithology (APP-057). The Atlantic puffin non-breeding season should be September to March (instead of mid-August to March, as stated in the document). This discrepancy does not impact the assessment presented in Volume 2, Chapter 5: Offshore ornithology (APP-057), which is based on the correct seasonal abundance figure presented in table 1.48 in Volume 6, Annex 5.2: Offshore ornithology displacement technical report (APP-092). The BDMPS bio-seasons for Atlantic puffin presented in table 1.4 in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report (APP-091) have also been checked and are correct. This will be included in the Errata document submitted at Deadline 1</p> <p>The Applicant has also noted a discrepancy in the post-breeding/autumn migration for Manx shearwater in table 5.14 in Volume 2, Chapter 5: Offshore ornithology (APP-057). Manx shearwater post-breeding/autumn migration should be September to October (instead of September to early October as quoted in table 5.14 in Volume 2, Chapter 5: Offshore ornithology (APP-057)). This discrepancy</p>

Reference	Relevant Representation Comment	Applicant's response
		<p>does not impact the assessment presented in Volume 2, Chapter 5: Offshore ornithology (APP-057), which is based on the correct post-breeding season/autumn migration abundance (182 individuals) presented in table 1.48 in Volume 6, Annex 5.2: Offshore ornithology displacement technical report (APP-092). The BDMPS bio-seasons for Man shearwater Atlantic puffin presented in table 1.4 in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation technical report (APP-091) have also been checked and are correct. This will be included in the Errata document submitted at Deadline 1</p> <p>It is acknowledged that the months considered in each bio-season for presenting mortality estimates of displacement and collision differ for certain species (namely black-legged kittiwake and northern gannet). For the displacement assessment (presented in Volume 6, Annex 5.2: Offshore Ornithology Displacement Technical Report (APP-092)), mortality estimates in the displacement matrices are generated for each bio-season (rather than produced for each month). For displacement, the mean seasonal peak abundance is inputted into the displacement matrix to calculate the seasonal mortality estimate. When a species' bio-season spans half a month (e.g., breeding northern gannet - mid March to mid September), it is not possible to split the abundance data, and the whole month was used to calculate the seasonal displacement mortality (e.g., March and September).</p> <p>For collision risk, mortality estimates are calculated for each month in the collision risk modelling. Monthly estimates are subsequently added together and therefore, it is possible to half a monthly collision mortality estimate to calculate the seasonal collision mortality estimate. Monthly estimates of collision mortality are appropriate to account for changing parameters such as operational down time of the wind turbines.</p> <p>For the displacement (table 1.3 of Volume 6, Annex 5.2: Offshore Ornithology Displacement Technical Report (APP-092)), the following months have been used in each bio-season:</p> <p>Northern gannet bio-seasons:</p> <ul style="list-style-type: none"> <li>• Pre-breeding: December to February.</li> <li>• Breeding: March to September.</li> <li>• Post breeding: October to November.</li> </ul> <p>Black-legged kittiwake bio-seasons:</p> <ul style="list-style-type: none"> <li>• Pre-breeding: January to March.</li> <li>• Breeding: April to August.</li> </ul>

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Reference	Relevant Representation Comment	Applicant's response
		<ul style="list-style-type: none"> <li>• Post-breeding: September to December.</li> </ul> <p>For collision, the following months were summed to provide the bio-seasonal impact:</p> <p>Northern gannet bio-seasons:</p> <ul style="list-style-type: none"> <li>• Pre-breeding: December, January, February and half of March.</li> <li>• Breeding: half of March, April, May, June, July, August and half of September.</li> <li>• Post breeding: half September, October and November.</li> </ul> <p>Black-legged kittiwake bio-seasons:</p> <ul style="list-style-type: none"> <li>• Pre-breeding: January, February and March and half of April.</li> <li>• Breeding: half of April, May, June, July and half of August.</li> </ul> <p>Post-breeding: half of August to December.</p>
RR-033.11	<p>Sections 5.3.9.10 to 5.3.9.12: We maintain our disagreement over the breeding season BDMPS reference population used for the alone assessment as has previously been advised. In the offshore ornithology EWG07 meeting, we agreed to disagree on EIA breeding reference population "RB - We will need to "agree to disagree" on other species but for gannet and Manx shearwater the lower number should be used", the lower value meaning whichever is lower between the SNCB approach and the applicant's proposed approach. Our agreement log maintains our disagreement with the proposed approach. The Applicant states in Section 5.3.9.12 of Volume 2, Chapter 5: Offshore ornithology that "During the seventh EWG meeting (held 8 December 2023), it was agreed that for the project alone assessment, foraging range populations could be used, however if the foraging range population is greater than the regional seas populations (BDMPS from Furness, 2015) then impacts would also be assessed against this population." This doesn't quite reflect the discussion or minutes of the EWG07 meeting. Our advised approach remains to consider breeding adult birds at colonies within the relevant BDMPS in which the project is located, plus the immatures associated with those colonies. Data should</p>	<p>The Applicant notes that JNCC maintains their request that the 'Regional Seas Breeding Season' populations be used for all assessments during the breeding season (even when the 'Regional Seas Breeding Season' population is larger than the Applicant's approach). The Applicant maintains the validity of the 'Foraging Range Breeding Season' populations. As noted in JNCC's comment, JNCC and the Applicant "agreed to disagree" on this item within the seventh EWG meeting and that "the population numbers calculated using the Applicant's approach will be presented for all species, but the numbers presented for gannet and Manx shearwater would be both the Applicant's and the SNCBs regional baseline populations" (Technical Engagement Plan Appendices - Part 1 (A to E) (APP-042). Therefore, the smaller of the populations will always be presented for precaution.</p> <p>The Applicant has assessed the project alone impact against the smaller of the two populations ("Regional Seas Breeding Season" or "Foraging Range Breeding Season"). Therefore, the Applicant considers that the most precautionary assessment has been presented within Volume 2, Chapter 5: Offshore ornithology (APP-057).</p> <p>It was not the Applicant's intention to incorrectly quote JNCC from discussions with the EWG within Section 5.3.9.12 of Volume 2, Chapter 5: Offshore ornithology (APP-057), but the Applicant considers what is presented is aligned with what was agreed with the EWG and represents the most precautionary assessment. If the "Regional Seas Breeding Season" population were used for species other than gannet and Manx shearwater, the impacts presented would be less than what is currently presented within Volume 2, Chapter 5: Offshore ornithology (APP-057).</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-033.12	<p>come from the tables in Appendix A of Furness (2015) for both breeding adults and immatures.</p> <p>Table 5.22: We welcome the seasonal restriction on installation of offshore cables throughout the wintering period for works inside the Liverpool Bay SPA, and that this will be secured through DCO requirement. However, it is unclear whether this includes a buffer around the SPA. Disturbance from vessels have been demonstrated for a number of species, and the zone of influence of this type of disturbance has been shown to extend to 2km for red-throated diver and 2.5km for common scoter. JNCC would recommend that the exclusion of operating within the Liverpool Bay SPA during the period stated is extended to within 2.5km of the SPA boundary.</p>	<p>The Applicant does not consider an additional buffer around the Liverpool Bay SPA boundary necessary. As shown in Figure 1.5 and Figure 1.9 of HRA Stage 2 Information to Support an Appropriate Assessment, Part Three: Special Protection Areas and Ramsar Sites Assessments (APP-033)), the predicted density of common scoter and red-throated diver (the two species most sensitive to vessel movements) is significantly reduced towards the SPA boundary (HiDef, 2023). Therefore, the inclusion of a 2 km or 2.5 km buffer around the SPA boundary would not reduce the magnitude of the impact currently presented (within table 1.47 of HRA Stage 2 Information to Support an Appropriate Assessment, Part Three: Special Protection Areas and Ramsar Sites Assessments [APP-033]), and no AOESI is still predicted to occur with or without the buffer.</p> <p>It should be noted that other recently consented offshore wind farms (e.g. East Anglia One and East Anglia Two), which committed to seasonal restrictions to protect qualifying features of SPAs (including red-throated diver), were not required to include a buffer around the SPA.</p>
RR-033.13	<p>Table 5.25: The incorrect Mean Seasonal Peak abundance appears to have been calculated for Atlantic puffin in the non-breeding season. Comparing Volume 6, Annex 5.1: Offshore Ornithology Baseline Characterisation Technical Report, Volume 6, Annex 5.2: Offshore Ornithology Displacement Technical Report, and Volume 2, Chapter 5: Offshore ornithology, suggests that the Mean Seasonal Peak was 22 for Atlantic puffin during the non-breeding season. Therefore, the predicted displacement mortalities during both the non-breeding season and annually may be incorrect. This may then have implications for the subsequent assessment, such as the need for apportioning of impacts, and LSE screening. We recommend a thorough review of the Mean Seasonal Peak calculation and the need for any subsequent assessment.</p>	<p>The Applicant acknowledges the discrepancy for Atlantic puffin during the non-breeding season. The seasonal mean peak should be 22 birds and not 0, as reported in Volume 2, Chapter 5: Offshore ornithology (APP-057). This will be included in the Errata document submitted at Deadline 1</p> <p>When considering the non-breeding period, the seasonal mean peak of 22 birds would result in no change in the expected mortality of 0 individuals (50% displacement and 1% mortality). The lower impact (30% displacement and 1% mortality) would also see no change (0 to 0 individuals), but the upper impact (70% displacement and 10% mortality) would change from 0 individuals to 2 individuals. The magnitude is still considered to be negligible as the baseline mortality rate will not exceed the 1% increase in baseline mortality. Therefore, this does not alter the conclusion of Volume 2, Chapter 5: Offshore ornithology (APP-057), provided in paragraph 5.7.2.55.</p>
RR-033.14	<p>Sections 5.7.2.105 to 5.7.2.106: We note the lack of Population Viability Analysis (PVA) for common guillemot against the reference population relevant to the 1% baseline mortality trigger prompting the need for a PVA within the ES. It is acknowledged that during the breeding season the</p>	<p>At NRW's request, a specific assessment of the impact on common guillemot from Pen y Gogarth/Great Ormes Head SSSI and Creigiau Rhiwledyn/Little Ormes Head SSSI was undertaken. When considering the Applicants' approach to displacement and mortality rates, baseline mortality for these two sites increased by &gt; 1%. No other specific sites were included within the PVA as the impact from</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>worst-case scenario of 70% displacement and 10% mortality, an increase in baseline mortality greater than 1% is predicted for common guillemot. It is then stated that PVAs have been carried out on two Sites of Special Scientific Interest (SSSI) breeding colonies. It is not clear why impacts have been assessed against those colony populations, when the reference population against which the predicted displacement mortalities were assessed was the foraging range breeding BDMPS population. Therefore, we would expect to see a PVA carried out for the breeding season alone impact mortalities against the breeding season reference population.</p>	<p>the project alone did not surpass a 1% increase in baseline mortality (as per guidance in Parker <i>et al.</i>, 2022).</p> <p>No PVA was undertaken on common guillemot at the regional level during the breeding season as it was only the maximum impact (70% displacement and 10% mortality), which surpassed the 1% threshold. In the Applicant's view, this mortality level is not evidenced to date from other offshore wind farm projects (APEM, 2022).</p> <p>Within Table 5.23 of Volume 2, Chapter 5: Offshore ornithology (APP-057), displacement as a result of the project is predicted to result in the mortality of between 6 to 148 individuals, increasing the baseline mortality by 1.623% when using the "Foraging Range Breeding Season" population which the Applicant maintains is valid. When using the JNCC preferred "Regional Seas Breeding Season" population of 1,145,528 birds, the increase in baseline mortality from 6 to 148 birds would increase the baseline mortality by up to 0.097% (152,355 baseline mortality). Therefore, a PVA would not be required.</p> <p>The Applicant does not consider a PVA required for impacts that are not founded in the evidence (APEM, 2022) and a more realistic impact has been focused on within the assessment.</p> <p>It would not be proportionate to present a PVA for a maximum impact. The assessments presented as part of Volume 2, Chapter 5: Offshore ornithology (APP-057) provides the stakeholders with the most scientifically robust impact assessment.</p>
RR-033.15	<p>Section 5.7.5: We disagree with the use and presentation of only mean or central collision estimates throughout. The Confidence Intervals associated with collision estimates should also be provided and taken through the assessment to assess the full range of potential effects. This comment also applies to the HRA Integrity Matrices document, Section 1.2.5, and the HRA Stage 1 Screening Report document, Section 1.4.6.</p>	<p>The number of expected collisions across months, including upper and lower confidence intervals, are displayed in Figures 1.2 to 1.7 and given within Tables 1.6 to 1.13 of Volume 6, Annex 5.3: Offshore ornithology collision risk modelling technical report (APP-093).</p> <p>The assessment presented in Volume 2, Chapter 5: Offshore ornithology (APP-057), the HRA Stage 1 Screening Report (APP-034) and the HRA Stage 2 Information to Support an Appropriate Assessment, Part Three: Special Protection Areas and Ramsar Sites Assessments (APP-033) is based on the mean collision estimate.</p> <p>The use of the mean collision estimate is a realistic and proportionate approach and is in line with multiple other application assessments (e.g. Awel y Môr windfarm project and Hornsea Three offshore windfarm).</p>
RR-033.16	<p>Section 5.7.5.13: We note the lack of PVA for breeding season collision impacts to great black-backed gull.</p>	<p>The Applicant maintains the validity of using the species-specific avoidance rates for the great black-backed gull Ozsanlav-Harris <i>et al.</i>, (2023) due to the sufficient</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>Predicted collisions are above 1% baseline mortality during the breeding season, yet a PVA have not been carried out. Therefore, we would expect to see a PVA carried out for the breeding season alone impact mortalities against the breeding season reference population.</p>	<p>sample size of the species-specific avoidance rates and the fact that the great black-backed gull is biologically different from the other gull species included within the "large gull" species group rate. When using the species-specific avoidance rate and the Applicant's smaller breeding population ("Foraging Range Breeding Season" population), the predicted impact is a &lt;1% increase in baseline mortality. Within Section 1.5.2 of Volume 6, Annex 5.3: Offshore Ornithology Collision Risk Modelling Technical Report (APP-093), justification is provided for focusing on the species-specific avoidance rates and explaining how the sample size justifies their use.</p> <p>Within Table 5.39 of Volume 2, Chapter 5: Offshore ornithology (APP-057), the additional mortality of 1.64 collisions (predicted using the species-group avoidance rate of 0.9939) increases the baseline mortality by 1.155% when using the "Foraging Range Breeding Season" population which the Applicant maintains is valid. When using the JNCC preferred "Regional Seas Breeding Season" population of 44,753 birds, the increase in baseline mortality of 1.64 birds would increase the baseline mortality by 0.039% (4,252 baseline mortality). Therefore, a PVA would not be required.</p>
RR-033.17	<p>Tables 5.38; 5.39; 5.42; and 5.44: For some species it would appear, though it is unclear, that impacts for a particular month which is within two BDMPS seasons have been split between the two seasons. Clarity is required if this is the case, and when this has been undertaken, and whether this is an appropriate use of the survey data, for instance when within a month the survey was carried out. For example, if data was calculated at one end of a month, is it appropriate to halve this value and associate one half with the other end of the month?</p> <p>Tables 5.38; 5.39; 5.42; and 5.44: If it is the case that impacts for a particular month which is within two seasons have been split between the two seasons, it is unclear whether this approach is appropriate when put into context of seasonal reference populations (e.g. Furness (2015)). Do the seasonal reference populations used also split populations in the one month between seasons?</p>	<p>The Applicant confirms that the following months have been used for each bio-season when calculating the impacts from collisions in Volume 2, Chapter 5: Offshore ornithology (APP-057). The predicted collisions estimates are presented per month and therefore the impact per bio-season is the summed total of the following months:</p> <p><u>Black-legged kittiwake</u></p> <ul style="list-style-type: none"> <li>• Pre-breeding: January, February and March and half of April.</li> <li>• Breeding: half of April, May, June, July and half of August.</li> <li>• Post-breeding: half of August, September, October, November and December.</li> </ul> <p><u>Gannet</u></p> <ul style="list-style-type: none"> <li>• Pre-breeding: December, January, February, April and half of March.</li> <li>• Breeding: half of March, April, May, June, July, August and half of September.</li> <li>• Post breeding: half of September, October and November.</li> </ul> <p><u>Great back-backed gull</u></p> <ul style="list-style-type: none"> <li>• Breeding: Half of March, April, May, June, July and August.</li> </ul>

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Reference	Relevant Representation Comment	Applicant's response
		<ul style="list-style-type: none"> <li>• Non-breeding: September, October, November, December, January, February and half of March.</li> </ul> <p><u>European herring gull</u></p> <ul style="list-style-type: none"> <li>• Breeding: March, April, May, June. July and August</li> <li>• Non-breeding: September, October, November, December, January and February.</li> </ul> <p><u>Lesser black-backed gull</u></p> <ul style="list-style-type: none"> <li>• Pre-breeding: March and April.</li> <li>• Breeding: April, May, June, July and August.</li> <li>• Post breeding: August, September and October.</li> <li>• Non-breeding: November, December, January and February.</li> </ul> <p>It is acknowledged that the months considered in each bio-season are different to that of the displacement assessment presented in Volume 6, Annex 5.2: Offshore Ornithology Displacement Technical Report (APP-092). Paragraph 1.3.3.2 provides justification for assigning a month that fell within two bio-seasons into a particular season with the breeding season given priority.</p> <p>For the displacement, the following months have been used in each bio-season:</p> <p><u>Northern gannet</u>  Pre-breeding: December to February  Breeding: March to September  Post-breeding: October to November</p> <p><u>Black-legged kittiwake</u>  Pre-breeding: January to March  Breeding: April to August  Post-breeding: September to December</p> <p>For the displacement assessment, mortality estimates in the displacement matrices are generated for each bio-season (rather than produced for each month). For displacement, the mean seasonal abundance is inputted into the displacement matrix to calculate the seasonal mortality estimate. When a species' bio-season spans half a month (e.g., breeding northern gannet - mid March to mid September), it is not possible to split the abundance data, and the whole month</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-033.18	<p>Section 5.9: We maintain our disagreement over the approach to cumulative (EIA) and in-combination assessments (HRA), and specifically the inclusion of projects with unquantified levels of impact (either because modelling techniques have changed, or their impacts were not quantitatively assessed), and this disagreement has been raised in Preliminary Environmental Information Report (PEIR) responses and during the EWGs. In October 2023, the SNCBs supplied bespoke advice to the Mona, Morgan generation and Morecambe generation projects (Proposed methodology for 'gap-filling' the Irish Sea R4 cumulative &amp; in-combination assessments, circulated by Natural England), providing a suggested approach to filling in gaps in data on impacts from relevant projects for cumulative/in-combination assessment. The Applicant has not followed this approach and has presented a qualitative approach for the projects with no data. We do not consider that the qualitative assessments presented by the Applicant are sufficient and do not consider that conclusions can be drawn without reasonable scientific doubt, regarding the accumulating scale of impact to some species. We therefore reiterate that our advice for a pragmatic method to address the lack of impact assessments for a number of historical Offshore Wind Farms (OWFs) in the region remains as detailed in the original SNCB advice.</p>	<p>was used (March and September) to calculate the seasonal displacement mortality.</p> <p>Whilst it is the Applicant's view that data gaps associated with historic offshore wind projects are an aspect of cumulative impact assessments that would be better addressed at the strategic level rather than the project level, updates were made to the cumulative impact assessment in response to JNCC's (as well as Natural England's and NRW's) Section 42 advice with respect to historic offshore wind projects impacts for application. These updates also captured additional advice provided by Natural England on 23 October 2023. The cumulative and in-combination assessments presented in Volume 2, Chapter 5: Offshore ornithology (APP-057) and HRA Stage 2 ISAA for SPAs and Ramsar sites (APP-033), respectively, consider the quantitative impact of historic offshore wind projects where it has been possible to derive estimates from project-specific documentation. In the absence of quantitative assessment for historical projects, qualitative assessment has been presented where the information was available. The Applicant remains confident that the approach and cumulative / in-combination assessments presented in Volume 2, Chapter 5: Offshore ornithology (APP-057) and HRA Stage 2 ISAA for SPAs and Ramsar sites (APP-033).</p>
RR-033.19	<p>Sections 5.9.2; 5.9.3; and 5.9.4: In the cumulative assessment, the abundance estimates at Erebus offshore wind farm are incorrect for several species. This was also the case in the Section 42 PEIR, and JNCC responded to these errors in our Section 42 PEIR response. However, the same errors remain. The abundance estimates to use should be those within Table 5-1 for common guillemot and Table 5-3 for Atlantic puffin in the Project Erebus: Supplementary Environmental Information Addendum Report (2022). The abundance estimates for gannet should be those within Table 23 of the Erebus: Offshore Ornithology</p>	<p>The Applicant acknowledges that the correct abundance estimate for Atlantic puffin within Project Erebus should be 1,416 individuals during the breeding season (not 15 individuals as presented in table 5.61 and 5.93 of Volume 2, Chapter 5: Offshore ornithology (APP-057)) and 160 individuals during the non-breeding season (not zero individuals as presented in Table 5.61 and 5.93 in Volume 2, Chapter 5: Offshore ornithology (APP-057)) for Erebus according to Table 5.3 of the Project Erebus: Supplementary Environmental Information Addendum Report (Blue Gem Wind, 2022). Furthermore, the Applicant acknowledges a discrepancy for northern gannet during the non-breeding season. The correct figure for northern gannet should be 100 individuals during the pre-breeding season, as stated in Table 23 Erebus: Offshore Ornithology 11.4</p>



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Reference	Relevant Representation Comment	Applicant's response
	<p>11.4 Technical Appendix – Displacement Analysis (2021). The abundance estimates for kittiwake should be those within Table 18 to 20 of the Erebus: Offshore Ornithology 11.4 Technical Appendix – Displacement Analysis (2021).</p> <p>Sections 5.9.3 and 5.9.4: In the cumulative assessment, the collision estimates for gannet at Erebus are incorrect. The collision estimates to use should be those within Table 5-31 of the Project Erebus: Supplementary Environmental Information Addendum Report (2022).</p>	<p>Technical Appendix – Displacement Analysis (HiDef, 2021) (not zero as presented in Table 5.65 and Table 5.98 of Volume 2, Chapter 5: Offshore ornithology (APP-057)). Peak abundances of other species (i.e., black-legged kittiwake, common guillemot, razorbill, Manx shearwater) have been checked for Project Erebus and represent the updated figures presented in the Project Erebus: Supplementary Environmental Information Addendum Report (Blue Gem Wind, 2022). This will be included in the Errata document submitted at Deadline 1.</p> <p>These discrepancies do not alter the conclusion of the assessment in Volume 2, Chapter 5: Offshore ornithology (APP-057), the HRA Stage 1 Screening Report (APP-034) and the HRA Stage 2 Information to Support an Appropriate Assessment, Part Three: Special Protection Areas and Ramsar Sites Assessments (APP-033).</p>
RR-033.20	<p>Sections 5.9.2; 5.9.3; and 5.9.4: Impacts in the cumulative tables often do not add up to the totals at the foot of the tables, and have multiple other errors in them, such as figures apparently attributed to the wrong wind farms, seasonal impacts not adding up to annual impacts.</p>	<p>The cumulative displacement abundances (e.g., Table 5.86 of Volume 2, Chapter 5: Offshore ornithology (APP-057) do not include the collision mortalities. As such, the last row of the table (i.e., Cumulative total (all projects) does not include the collision mortalities from tidal projects.</p> <p>As an example, in Table 5.86 of Volume 2, Chapter 5: Offshore ornithology (APP-057), the total annual abundance (minus the Mona Offshore Wind Project) of 15,059 individuals and the cumulative total (all projects) of 17,578 individuals does not include the collision impacts from the two tidal projects (Holyhead Deep – Tidal Energy and West Anglesey Demonstration Zone tidal site). The collision impacts are considered when the increase in baseline mortality is presented. For example, in paragraph 5.9.2.72 of Volume 2, Chapter 5: Offshore ornithology (APP-057), the additional 24 collision mortalities associated with the tidal projects are specifically mentioned.</p> <p>Following JNCC advice, the Applicant can confirm within table 5.75 of Volume 2, Chapter 5: Offshore ornithology (APP-057) incorrectly presents 177 individuals during the post-breeding season of Manx shearwater within Awel y Môr. The correct number is 214 individuals (Table 24 of RWE, 2022). The annual total presented in table 5.75, is correct (417 individuals). The total CEA post-breeding impact of 1,414 individuals is incorrect and should be 1,451. This increases the predicted mortality (table 5.77 of Volume 2, Chapter 5: Offshore ornithology [APP-057]) from 4 (range 3 to 57) to 7 (range 4 to 102). This is still of negligible impact and the conclusions remain valid.</p> <p>Similarly, table 5.81 of Volume 2, Chapter 5: Offshore ornithology (APP-057) incorrectly presents 238 common guillemot within Twinhub during the breeding season; this should be 183 individuals (table 6.4 of Wave Hub, 2018). However,</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>the annual 'Total (minus the Mona Offshore Wind Project)' of 87,577 is correct, and therefore, there is no change to the assessment and the conclusions remain valid.</p> <p>Table 5.98 of Volume 2, Chapter 5: Offshore ornithology (APP-057) incorrectly states that the annual 'Cumulative total (all projects)' is 6,690 northern gannet, however this should be 7,119 birds. This would amend the mortality (table 5.102 of Volume 2, Chapter 5: Offshore ornithology [APP-057]) from 47 (range 40 to 535 individuals) to 50 (range 43 to 570 individuals), which is still of negligible impact and the conclusions remain valid.</p> <p>Table 5.104 of Volume 2, Chapter 5: Offshore ornithology (APP-057) also incorrectly states that the annual 'Cumulative total (all projects)' is 26,604 black-legged kittiwake. However, this should be 25,897 birds. This would amend the mortality (table 5.108 of Volume 2, Chapter 5: Offshore ornithology [APP-057]) from 133 (range 80 to 1,862 individuals) to 129 (range 78 to 1,813 individuals), which is still of negligible impact and the conclusions remain valid. This will be included in the Errata document submitted at Deadline 1</p> <p>In regard to some sites having the data incorrectly assigned to another site, the Applicant confirms that there are some discrepancies within the tables regarding which row an impact was placed (e.g. impacts for Burbo Bank Extension being attributed to Burbo Bank). This will be included in the Errata document submitted at Deadline 1. However, this does not change the overall impact presented for the cumulative and in-combination assessment. The Applicant maintains the outcomes of the assessments do not change.</p>
RR-033.21	<p>Section 5.9.3: For the ES cumulative assessment, it appears that collision estimates from other offshore wind farm projects have been adjusted to account for different avoidance rates. However, it is not stated that this has been done, nor how this has been done. Therefore, we cannot replicate the findings, or determine whether the method or results are correct.</p>	<p>The predicted collision figures in the cumulative collision assessment (see section 5.9.3 of Volume 2, Chapter 5: Offshore ornithology [APP-057]) for the other projects were corrected for the current advised avoidance rates.</p> <p>For the assessment, it is crucial to base results on the most recent available evidence, such as the study by Ozsanlav-Harris <i>et al.</i> (2023), rather than older offshore wind farm applications that used outdated avoidance rates. This approach ensures a "common currency" between Environmental Impact Assessments (EIAs), making conclusions robust and reflective of the true likely effect. This method has been applied in previous offshore wind farm applications (e.g. Awel y Môr) and is considered robust.</p> <p>Older wind farm applications used avoidance rates as low as 0.980, whereas updated evidence now indicates rates up to 0.9991 for the same species</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>(Ozsanlav-Harris <i>et al.</i> (2023). Some applications have used rates of 0.989, which still differ significantly from the updated rates used in more recent cumulative effect assessments. Consequently, combining results based on different avoidance rates is not considered a robust approach.</p> <p>The calculation to standardise impacts by using a consistent avoidance rate is straightforward due to how the Band collision model works. The avoidance rate is applied at the end of the CRM calculation, allowing for an easy backward calculation to occur to make the avoidance rate consistent between projects. Collision risk models used by other developments have employed the same modelling parameters as those used for the Mona Offshore Wind Project (e.g., flight speeds, flight height).</p> <p>The calculation used for collision impacts from each offshore wind farm was calculated as follows:</p> $(Total\ impact\ using\ original\ avoidance\ rate / (1 - (Original\ avoidance\ rate / 100))) * (1 - (new\ updated\ avoidance\ rate / 100))$ <p>For example, the original collision impact of 51.5 gannet from Walney Extension was derived using an avoidance rate of 98.9. Using the avoidance rate of 99.28, the collision impact is 33.71, calculated as follows:</p> $(51.5 / (1 - (98.9 / 100))) * (1 - (99.28 / 100)) = 33.7091$
RR-033.22	<p><b>Volume 6, Annex 5.5: Offshore ornithology apportioning technical report</b></p> <p>Table 1.4: The last column in Table 1.4 should be titled "Proportion of adult birds (%)" not "Proportion of immature birds (%)".</p>	<p>The heading of Volume 6, Annex 5.5: Offshore ornithology apportioning technical report (APP-095) Table 1.4 should read "Proportion of adult birds (%)". This will be included in the Errata document submitted at Deadline 1.</p>
RR-033.23	<p>Section 1.3.3: No information is provided on the number of adults and immatures identified from Digital Aerial Surveys (DAS). Without an understanding of the number of birds identified to age classes, as a proportion of the total number of birds (per species), it is hard to know whether a representative sample was identified, and whether this was appropriate to use when applying a ratio of adults and immatures to unidentified birds.</p>	<p>The number of identified adults and immatures for northern gannet, black-legged kittiwake, herring gull, great black-backed gull and lesser black-backed gull from the site-specific Digital Aerial Surveys (DAS) is provided in table 1.4 of Volume 6, Annex 5.5: Offshore ornithology apportioning technical report (APP-095). Also included is the number of birds for which age could not be identified. The last column of table 1.4 Volume 6, Annex 5.5: Offshore ornithology apportioning technical report (APP-095) presents the percentage of adult birds (albeit this is incorrectly labelled as 'proportion of immature birds') – see response to row ID RR-033.22.</p>

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Reference	Relevant Representation Comment	Applicant's response										
RR-033.24	<p>Section 1.3.3: We disagree with the calculation of kittiwake age classes. This approach was not raised by the applicant during EWG meetings or subsequently, and therefore JNCC has not agreed to this approach. The Hornsea Offshore Wind Farm Project Two approach to apportioning to age class referred to in Section 1.3.3.5 relies on reliable counts of first year birds, i.e. in the case of kittiwake first summer birds which by August of that year have largely transitioned to adult plumage and therefore indistinguishable from adults. Therefore, the identification rate of first summer kittiwake is questionable and calculations derived from this, for example, applying survival rates to define an age class structure is also questionable. It is noticeable that more recent projects such as Hornsea Offshore Wind Farm Project Four and the East Anglia projects have not used this approach. Further, we advise that stable age structures are not derived using population viability analysis, and the method outlined in this report is effectively a manual version of this, which we do not recommend. We therefore disagree with the percentage of kittiwake adults and immatures in the breeding season in Table 1.6.</p>	<p>The Applicant has provided the scientific rationale for this approach in paragraph 1.3.3.4 in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report (APP-095).</p> <p>The Applicant stated in paragraph 1.3.3.4 “Coulson (2011) presents evidence that shows that immature kittiwakes, particularly those in their second and third years, frequent natal waters, with older immatures increasingly populating breeding colonies. Using site-specific survey data to calculate age class proportions for the breeding season will lead to an underestimation of second- and third-year immatures. Utilising the current approach (i.e., using proportions of adult and immature birds from DAS to age-class birds) will therefore lead to an overestimation of adults, as only one-year-old birds are distinguishable during surveys, with all other age groups categorised as adults”.</p> <p>The proportion of birds recorded as adult plumage during the site-specific surveys undertaken in the breeding season is 95.23% (table 1.4 of Volume 6, Annex 5.5: Offshore ornithology apportioning technical report (APP-095)).</p> <p>If 95.23% of birds in the breeding season (as suggested by NRW) had been used instead of 87.68%, the Applicant can confirm that there would be no material change to the assessment within the HRA Stage 1 Screening Report (APP-034) nor HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (APP-033). Had 95.23% been used one additional site would have been screened into Stage 2 of the HRA. Wicklow Head SPA would change from 0.0 birds to 0.1 birds when considering the species group avoidance rate (99.3%). This SPA would have been presented within Step 1 (section 1.5 of APP-033). For completeness, an example table for Wicklow Head SPA is presented below, where 95.23% of the breeding season population has been assigned to adults.</p> <table border="1" data-bbox="1153 1085 2132 1420"> <thead> <tr> <th data-bbox="1153 1085 1299 1228">Qualifying feature</th> <th data-bbox="1299 1085 1478 1228">Predicted mortalities</th> <th data-bbox="1478 1085 1668 1228">Latest population and baseline mortality</th> <th data-bbox="1668 1085 1814 1228">% increase in baseline mortality</th> <th data-bbox="1814 1085 2132 1228">Conclusion</th> </tr> </thead> <tbody> <tr> <td data-bbox="1153 1228 1299 1420">Black-legged kittiwake</td> <td data-bbox="1299 1228 1478 1420">Annual collision mortality of 0.0 to 0.1</td> <td data-bbox="1478 1228 1668 1420">1,348 breeding adults 197 baseline mortality</td> <td data-bbox="1668 1228 1814 1420">0.01 to 0.03</td> <td data-bbox="1814 1228 2132 1420">No risk of an adverse effect on the integrity of the Wicklow Head SPA from the Mona Offshore Wind Project alone.</td> </tr> </tbody> </table>	Qualifying feature	Predicted mortalities	Latest population and baseline mortality	% increase in baseline mortality	Conclusion	Black-legged kittiwake	Annual collision mortality of 0.0 to 0.1	1,348 breeding adults 197 baseline mortality	0.01 to 0.03	No risk of an adverse effect on the integrity of the Wicklow Head SPA from the Mona Offshore Wind Project alone.
Qualifying feature	Predicted mortalities	Latest population and baseline mortality	% increase in baseline mortality	Conclusion								
Black-legged kittiwake	Annual collision mortality of 0.0 to 0.1	1,348 breeding adults 197 baseline mortality	0.01 to 0.03	No risk of an adverse effect on the integrity of the Wicklow Head SPA from the Mona Offshore Wind Project alone.								

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Reference	Relevant Representation Comment	Applicant's response
		<p>The Applicant considers that the predicted impacts presented on SPA populations are not impacted by the two different proportions of adult birds and all impacts presented are correctly identified and assessed.</p> <p>It should be noted that NRW accepted the use of the stable age structure from Furness (2015) for the Awel y Môr Offshore Wind Farm application (RWE, 2022). The Applicant considers that using the site-specific data (as requested by JNCC) at the Mona Offshore Wind Project to inform age structure does not impact the conclusions of the final assessment for black-legged kittiwake and all assessments and their conclusions remain valid.</p>
RR-033.25	<p>Section 1.3.3: We disagree with the methods of apportioning impacts between adults and immatures during the non-breeding season. We advise that the same approach is taken as for the breeding season, as has been advised previously during EWG meetings and correspondence, by using the proportions of adults and immatures identified by surveys, and otherwise assuming all adult-type birds are adults.</p>	<p>The calculation of apportioning values for non-breeding seasons has followed the approach used previously in the application for Development Consent for multiple offshore wind farms (e.g., East Anglia THREE Ltd., 2015, Outer Dowsing, 2024) and is advised for use by Natural England (Parker <i>et al.</i>, 2022). For apportionment, the contribution of adult birds from an individual designated site, as estimated by Furness (2015), to the relevant BDMPS population for each species/season combination is divided by the total BDMPS population. This follows advice received by NRW during the EWG03 (section D.4.1 Meeting minutes of Technical Engagement Plan Appendices Part 1 (A to E) (APP-042).</p>
RR-033.26	<p>Section 1.3.5: We disagree with the method of apportioning impacts to SPAs during the non-breeding season. We recommend that to calculate apportion impacts to colonies in the non-breeding season, this should be based on the proportion of the SPA adult birds, across the BDMPS total of birds of all ages, for each relevant non-breeding BDMPS season, as has been advised previously during EWG meetings and correspondence.</p>	<p>The Applicant can confirm that the impacts apportioned to each SPA in the HRA Stage 1 Screening Report [APP-034] and HRA Stage 2 Information to Support an Appropriate Assessment, Part Three: Special Protection Areas and Ramsar Sites Assessments (APP-033) are for adult birds only in both the breeding and non-breeding period.</p>
RR-033.27	<p>Table 1.7: It is not clear whether sabbatical birds have been removed from the assessment or not. There is suggestion that they haven't, yet the heading of Table 1.7 suggests that sabbatical rates are considered within the HRA.</p>	<p>Paragraph 1.3.4.5 of Volume 6, Annex 5.5: Offshore apportioning technical report (APP-095) specifically states "<i>The apportioning assessment carried out for the Mona Offshore Wind Project does not exclude sabbatical birds at the request of the Offshore Ornithology EWG [Expert Working Group] meeting three (held 30/11/2023).</i>"</p> <p>Table 1.7 of Volume 6, Annex 5.5: Offshore ornithology apportioning technical report (APP-095) is shown for information purposes only. The paragraph above table 1.7 (paragraph 1.3.4.5) states "<i>...The apportioning assessment carried out</i></p>

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Reference	Relevant Representation Comment	Applicant's response
RR-033.28	<p><b>Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report</b></p> <p>Table 1.4: The BDMPS and baseline mortality values for great black-backed gull appear to be associated with the wrong seasons. For the annual assessment the BDMPS should be 44,753 with a baseline mortality of 4,252. For the non-breeding season, the BDMPS population should be 17,742 with a baseline mortality of 1,685. The PVA logs in Appendix A2.1 and A2.2 appear to have associated the correct reference populations per season, therefore the PVA itself appear to have used the correct values, but the values in Table 1.4 are incorrect.</p>	<p><i>for the Mona Offshore Wind Project does not exclude sabbatical birds at the request of the Offshore Ornithology EWG meeting three (held 30/11/2023)."</i></p> <p>The Applicant recognises that in Table 1.4 of Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report (APP-096), the seasons associated with great black-backed gull in the UK Southwest and English Channel have the wrong BDMPS and baseline mortalities assigned to them. However, as shown in Appendix A2.1 and A2.2 (Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report (APP-096)) the correct values were used in calculating PVA.</p>
RR-033.29	<p>Table 1.12 and Table 1.13: The extremely high predicted growth rates associated with great black-backed gull are at odds with the general trend in Global and European (where non-breeding great black-backed gull in UK waters are likely to originate) and UK breeding populations being that of decline (albeit with range expansion). For example, Burnell et al. (2023) highlights the overall declines in breeding great black-backed gull in Britain and the UK since the previous national census (Seabird 2000) of -55% and -52%, respectively. England has suffered a smaller decline (-3%), with the breeding population of the Isles of Scilly increasing slightly (14%). Given the overall picture of decline, we question whether increases in population of ~12,000% predicted by the PVA would ever be realised in reality, and hence the reliability of the PVA predictions. We recommend a sense check of the PVA input and outputs before having reliance on the outputs.</p>	<p>The Applicant acknowledges the concerns with the PVA outputs for great black-backed gull which have been raised by JNCC. The provision of the best available estimates of productivity from JNCC and survival rates advocated by SNCBs (from Horswill and Robinson (2015)) have been used for the PVA and this results in significant increases in the population size (many thousands of percentage increases).</p> <p>As discussed within Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report (APP-096), the Counterfactual Growth rate (CGR) metric is more applicable and insightful due to how the models have been run. Models were run as density independent (in line with current Natural England guidance (Parker <i>et al.</i>, 2022)), and therefore the predicted population size at the end of the PVA is likely to be inaccurate as some density dependence will occur in nature. As outlined in Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report (APP-096), and Volume 2, Chapter 5: Offshore ornithology (APP-057) the focus of the PVA outputs should be on the CGR and not population size due to its inherent and accepted issues.</p> <p>The Applicant acknowledges that the population has decreased slightly within England (Burnell <i>et al.</i>, 2023) but has used the best available data in accordance with current guidance and best practice available at the time of writing.</p>
RR-033.30	<p><b>HRA Stage 1 Screening Report</b></p> <p>There are multiple discrepancies between the main text of the HRA Stage 1 Screening Report and the appendix tables</p>	<p>The Applicant welcomes JNCC's comments on the HRA Stage 1 Screening Report (APP-034) and has provided responses to the specific comments below.</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>of the same document. All values (text and tables) should be double-checked and updated where necessary. The HRA Stage 1 Screening Report provides very little information to cross reference which values from other documents have been used, and through what calculation, in order to generate results. Therefore, it is nearly impossible to follow what values have or have not been used. We strongly recommend that the HRA Stage 1 Screening Report contains a clear audit trail of what values and parameters have been used, where they have been used, and how they have been applied. Without this, we cannot confidently replicate the results, and hence we cannot have confidence in the results.</p>	
RR-033.31	<p>Table 1.2 and Table 1.7: We disagree with the application of foraging ranges for Atlantic puffin. Although breeding season apportioning has not been carried out, our view is that it should be when using the correct Mean Season Peak value (see comment on Atlantic puffin MSP error), therefore it is important to use the correct foraging range. It is not accurate to state, in Tables 1.2 and 1.7 of the HRA Stage 1 Screening Report, that "JNCC requested (via their S42 response) that all SPAs to the north of the Mona Offshore Wind Project within 265.4km be considered for Atlantic puffin.". In JNCC correspondence to the Applicant on 28 June 2023, we advised "We confirm that the foraging range to use for Atlantic puffin is 265.4km (MM+SD). Woodward et al. (2019) state (page 138) that "As was the case for common guillemot and razorbill, foraging distances travelled by Atlantic puffin from Fair Isle are higher than those at most other sites (RSPB dataset), although they are not as exceptional when compared to other sites as those of the other two auk species" and "Observations of birds carrying fish have been made at distances of 250km from the Faeroe Islands (Harris &amp; Wanless 2011), offering further speculative evidence that Atlantic puffins forage at longer distances than the other auk species. Hence the distances observed from Fair Isle and Hermaness should not necessarily be considered exceptional until more data and data from</p>	<p>Whilst the Applicant has used the foraging range for Atlantic puffin of 265.4 km that JNCC requested (following the fifth EWG meeting) in Volume 6, Annex 5.5: Offshore Ornithology apportioning technical report (APP-095) and Volume 2, Chapter 5: Offshore Ornithology (APP-057), the Applicant acknowledges a misinterpretation of JNCC S42 response and the incorrect foraging range of 250.8 km has been presented in table 1.2 and table 1.7 of HRA Stage 1 Screening Report (APP-034). This will be included in the Errata document submitted at Deadline 1.</p> <p>However, no SPAs are located between 250.8 and 265.4 km, and therefore, no SPAs have been excluded that should have otherwise been included in the assessments.</p>

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	<p>additional colonies have been collected, particularly data from colonies where local prey availability may be greater". Therefore, we advise using the generic mean max +1SD value as stated in Table 5." Therefore, we advised that the foraging range within Table 5 of Woodward et al. (2019) (137.1 ± 128.3 = 265.4km) should be applied to all SPAs. There is no exception to this value for Atlantic puffin. This value should be used throughout.</p>	
RR-033.32	<p>Table 1.2 and Table 1.7: We disagree with the application of foraging ranges for common guillemot and razorbill. It is not accurate to say, in Tables 1.2 and 1.7 of the HRA Stage 1 Screening Report, that "JNCC requested via their S42 response all SPAs to the north of the Mona Offshore Wind Project within 153.7km be considered for common guillemot" and "JNCC requested via their S42 response all SPAs to the north of the Mona Offshore Wind Project within 164.6km be considered for razorbill". We do recommend that these values are applied in certain circumstances. However, these circumstances are not "all SPAs north of Mona", the circumstances are for all Northern Isle SPAs. Therefore, it is unclear whether the correct SPAs and other sites have been screened in with regard to Atlantic puffin, common guillemot, and razorbill. It is therefore also unclear whether the calculations in Volume 6, Annex 5.5: Offshore Ornithology apportioning technical report are correct, and subsequently, any of the values relevant to these species and SPAs in the HRA.</p>	<p>The Applicant acknowledges the incorrect interpretation of advice received from JNCC regarding the foraging ranges for common guillemot and razorbill presented within table 1.7 of the HRA Stage 1 Screening Report (APP-034). Table 1.7 stated that the foraging range of common guillemot from SPAs to the north of the Mona Offshore Wind Project is 153.7 km, the correct value is 95.2 km. Table 1.7 also stated that the foraging range of razorbill from SPAs to the north of the Mona Offshore Wind Project is 164.6 km, the correct value is 122.2 km. This will be included in the Errata document submitted at Deadline 1.</p> <p>The Applicant can confirm that no SPAs with common guillemot nor razorbill as a qualifying feature are located between 95.2 and 153.7 km for common guillemot nor between 122.2 to 164.6 km for razorbill. Therefore, no additional sites are required to be included within the assessment, nor were any sites brought into the assessments incorrectly. Therefore, the Applicant is confident in the conclusions presented.</p> <p>The correct foraging ranges were used for both species in Volume 6, Annex 5.5: Offshore ornithology apportioning technical report (APP-095) and Volume 2, Chapter 5: Offshore Ornithology (APP-057).</p>
RR-033.33	<p>Section 1.4.6.17: We disagree with the use of only specific displacement rates and mortality ranges in the HRA displacement assessment. We advise that the full range of displacement and mortality ranges previously advised are used and presented within the HRA to assess the full range of potential effects. It is odd that the full range of displacement rates and mortality rates have been presented and assessed within the ES, yet specific rates have been used within the HRA. Whilst we would not base our advice solely on the worst-case likely scenario, it is important to look at the range likely to scenarios in order to determine</p>	<p>The Applicant has presented the range values for displacement estimates (based on displacement and mortality rates including minimum, most scientifically robust value and maximum) in Volume 2, Chapter 5: Offshore ornithology (APP-057) together with associated increase in baseline mortality (e.g., Table 5.23 for common guillemot). The most scientifically robust value is based on a review of evidence-based displacement and mortality rates provided in section 5.7.2 of the Volume 2, Chapter 5: Offshore ornithology (APP-057).</p> <p>The Applicant acknowledges that the minimum value (from the lowest displacement and mortality rates) has been taken forward in the HRA. This occurred in error and the value used within the EIA should have been represented.</p>



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	<p>whether there is a realistic possibility of impact that would need further consideration (i.e. through Appropriate Assessment). It is important to follow the stepwise process of the Habitats Regulations Assessment process in order to systematically consider the impacts of a Plan or Project to an appropriate level.</p>	<p>This will be included in the Errata document submitted at Deadline 1. The Applicant can confirm that no additional site within Step 1 (Section 5 of HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments [APP-032]) would have been taken forward to Step 2 (of [APP-032]) if the value used in the EIA was presented. All impacts to all species would stay as an &lt;0.05% increase in baseline mortality apart from Isle of Scilly SPA which is already included within Step 2 (of [APP-032]). Therefore, the Applicant consider that impacts presented are robust and no amendments are required to the submitted documents.</p>
RR-033.34	<p>Section 1.4.6.30: While we have accepted the approach to LSE screening and Appropriate Assessment in this case, it should be noted that the LSE test is a course filter, as per our advice given during pre-application meetings, our response to the Section 42 PEIR, and as summarised in Table 1.2 of the HRA Stage 1 Screening report. The screening presented in this application has gone beyond an assessment of whether an impact pathway has the potential to compromise the ability of the site to meet its conservation objectives, and has additionally examined the magnitude of impact, as apportioned to each relevant MPA, and whether this would represent an LSE (e.g. through examining whether mortality would be increased by &gt;1%). We are of the view that this approach may not be appropriate for projects where larger magnitude impacts are expected.</p>	<p>The Applicant welcomes JNCC's agreement that the approach to the screening of LSE was appropriate for the Mona Offshore Wind Project.</p>
RR-033.35	<p>Table 1.68: Throughout the HRA, the qualifying features of Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA appear to be incorrect. We recommend the features and assemblages are carefully checked against the SPA designation information (found here: <a href="https://jncc.gov.uk/our-work/skomer-skokholm-and-the-seas-off-pembrokeshire-mpa">https://jncc.gov.uk/our-work/skomer-skokholm-and-the-seas-off-pembrokeshire-mpa</a>), and the details within the HRA updated. We have advised on errors in the description of features of Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA during the Section 42 PEIR response, yet the errors remain. This comment also applies</p>	<p>The Applicant acknowledges that within Table 5.10 of Volume 2, Chapter 5: Offshore ornithology (APP-057) incorrectly assigns Atlantic puffin to part of the seabird assemblage when it is a full qualifying feature. This will be included in the Errata document submitted at Deadline 1. This does not impact the assessment of the species within the EIA and the species is fully considered.</p> <p>Within Table 1.10 of the HRA Stage 1 Screening Report (APP-034) Atlantic puffin is incorrectly included as an assemblage feature, however it is a full qualifying feature. This discrepancy does not impact the assessment of Atlantic puffin throughout the HRA.</p> <p>Within Table 1.9 of the HRA Stage 1 Screening Report (APP-034) European storm petrel is excluded incorrectly as a breeding species within its foraging range; however the species is included within Table 1.11 of the HRA Stage 1 Screening</p>

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	<p>to the Volume 2, Chapter 5: Offshore ornithology, Table 5.10.</p>	<p>Report (APP-034) and is therefore included within the assessment. This will be included in the Errata document submitted at Deadline 1.</p> <p>Within Table 1.10 of the HRA Stage 1 Screening Report (APP-034) no difference was presented between a species included within an assemblage and a named qualifying feature. This is in line with the reference source (Furness, 2015).</p> <p>These discrepancies are repeated in Table 1.53 and Table 1.68, with some species not correctly identified as a named qualifying feature or part of the named assemblage. However, all the species are accounted for and included in the assessment of impacts.</p> <p>The Applicant is content that the discrepancies in assigning an assemblage species or qualifying feature to the individual species designated at Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA do not contribute to an error in impact assessment. All potentially impacted species are assessed; therefore, the conclusions remain valid.</p>
<p>RR-033.36</p>	<p>Section 1.4.6.49: As far as we are able to calculate, we generate different values of apportioned adult impacts for at least great black-backed gull and kittiwake compared to those in the HRA Stage 1 Screening Report appendix tables. Due to the unclear method and values used, it is not known whether there are errors in the calculation, or a different method has been applied, or different values are being used, to those we assume are used. We recommend a thorough check of the values and calculations used to generate the results in the HRA Stage 1 Screening Report, and that the values and method of apportioning impacts are fully presented. Without these, we cannot confidently replicate the results, and hence we cannot have confidence in the results.</p>	<p>The Applicant acknowledges that a fully worked example for a species and site of all apportioning (age classes and apportionment of impacts) will add clarity and confidence in the predicted levels of impact.</p> <p>A worked example for great black-backed gull from the Isles of Scilly SPA is presented below, with references to where this information is provided within the application documents.</p> <p>The Isles of Scilly SPA is designated for the great black-backed gull and is located within the "UK Western" BDMPS as presented in Furness (2015). Mona Offshore Wind Project is also located within the UK Western BDMPS. Great black-backed gulls from the Isle of Scilly SPA comprise 28.85 % of the adult birds within the BDMPS during the non-breeding period (1,622 birds out of 5,622; Furness, 2015).</p> <p>The age classes used for apportioning are presented in Table 1.6 of the Apportioning Technical Report (APP-095). The impacts present in the HRA are for adult birds only. For great black-backed gull this is estimated as 44 % adult in the non-breeding season, as taken from Furness (2015).</p> <p>The number of great black-backed gull collisions during the non-breeding season is presented in Table 5.39 of Volume 2, Chapter 5: Offshore ornithology (APP-057). This is 3.18 individuals (all age classes) when using 99.39 % avoidance or 0.48 when using 99.91 % avoidance. A monthly breakdown of collisions is presented in Table 1.7 of the Collision Risk Modelling Technical Report (APP-094). Table A.12 of the HRA Stage 1 Screening Report (APP-034), which presents the apportioned impact, presents that between 0.1 (99.91 % avoidance) and 0.4</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>(99.39 % avoidance) great black-backed gull collisions can be apportioned to the Isles of Scilly SPA.</p> <p>The total impact on great black-backed gull from the Isles of Scilly SPA was calculated as follows.</p> <p><i>Collisions during the non-breeding season x proportion of adult birds x proportion from the Isle of Scilly SPA</i></p> <p><math>3.18 \times 0.44 \times 0.2885 = 0.40</math> <b>or</b></p> <p><math>0.48 \times 0.44 \times 0.2885 = 0.06</math></p> <p>This is also presented within point C) below paragraph 1.4.6.72 of the HRA Stage 1 Screening Report (APP-034). As the impact is <math>\geq 0.05</math> birds, the site is screened into the HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites assessments (APP-033).</p>
RR-033.37	<p><b>HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments</b></p> <p>We disagree with several elements of the assessment to offshore ornithology within the HRA. In addition, there are multiple errors within the tables and text, and errors when using values in subsequent stages of the assessment. Many aspects of the assessment are difficult to follow what has been done or where values have come from. Due to these disagreements, errors, and lack of clarity, we do not have confidence in the results, nor are we able to agree with the overall conclusions of the HRA, particularly with regards to Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA.</p>	<p>The Applicant has clarified the specific points raised by JNCC with respect to the HRA in the preceding responses.</p>
RR-033.38	<p>Section 1.4.6.3: The threshold of using 0.05% baseline mortality from the project alone to screen whether impacts should be considered in-combination was not raised by the applicant during EWG meetings or subsequently, and therefore JNCC has not agreed to this approach. We recommend that the Applicant be clear on what this percent increase in baseline mortality would be in absolute mortality terms. We are not aware that similar thresholds have been applied in other cases to screen in or out from in-combination assessment, and note that the East Anglia Two</p>	<p>The Applicant has taken an approach where if the predicted impact from the project alone equates to less than 0.05 % of baseline mortality of a designated site, then the Applicant deems this as “non-material” and within natural population fluctuations. Therefore, this site and species are screened out of the in-combination assessment within Step 2 of the HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites assessments (APP-033).</p> <p>A similar threshold approach has been applied in Plan-level HRAs and other offshore wind applications (GreenVolt, Awel y Môr and Hornsea Four; however,</p>

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	<p>OWF HRA does not refer to such a threshold when considering whether a project should be considered in-combination with other Plans and Projects (<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-010066-EA2-HabitatsRegulationsAssessment.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-010066-EA2-HabitatsRegulationsAssessment.pdf</a>). We request that the Applicant provide justification for the appropriateness of this approach.</p>	<p>none of these applications specifically defined an increase in baseline mortality threshold enabling a consistent approach to be taken. The Applicant has used a specific threshold set as &lt;0.05 % as this would equate to a negligible impact at EIA scale.</p> <p>It must be noted that the approach to the screening out of in-combination assessments was deemed appropriate by NRW as part of their Relevant Representation for the Mona Offshore Wind Project (RR-011).</p>
RR-033.39	<p>Section 1.6.3.20: Note that predicted works (cable repair and reburial) would not need to occur concurrently in order to have the predicted impacts (just within the same non-breeding season). However, we welcome that the assessment is based on the total predicted habitat loss, irrespective of when it may occur.</p>	<p>The Applicant welcomes JNCC's agreement with the Applicant's approach.</p>
RR-033.40	<p>Section 1.6.3.44: We disagree with the interpretation that birds on migration are not specifically part of the Liverpool Bay/Bae Lerpwl SPA citation and therefore are not considered part of the non-breeding season assemblage. The SPA citation refers to non-breeding birds. There are no breeding red-throated divers in England or Wales, and therefore any birds present within the SPA will be non-breeding birds (even when present during the defined breeding season cited). We therefore do not agree that they can be discounted as not part of the protected population. We do note however that as per the SPA Conservation Advice, April and September represent months where smaller numbers of this species can be expected, and significant Impact and Adverse Effect on Integrity (AEOI) is less likely than in 'core' months of the non-breeding period.</p>	<p>The Applicant acknowledges that the non-breeding season assemblage feature of the Liverpool Bay/Bae Lerpwl SPA has been misinterpreted in paragraph 1.6.3.44 of HRA Stage 2 Information to Support an Appropriate Assessment Part 3: Special Protection Areas and Ramsar Sites Assessments (APP-033) and should include non-breeding red-throated diver. This will be included in the Errata document submitted at Deadline 1. However, all red-throated divers present within the cable corridor have been assessed within HRA Stage 2 Information to Support an Appropriate Assessment Part 3: Special Protection Areas and Ramsar Sites Assessments (APP-033). Therefore, the statement in paragraph 1.6.3.44 does not influence how the species has been presented and assessed during the summer months (see paragraph 1.6.3.46 and table 1.51 of HRA Stage 2 Information to Support an Appropriate Assessment Part 3: Special Protection Areas and Ramsar Sites Assessments (APP-033)).</p> <p>The Applicant is content that despite this discrepancy, the assessment and conclusion of no adverse effect on site integrity presented in HRA Stage 2 Information to Support an Appropriate Assessment Part 3: Special Protection Areas and Ramsar Sites Assessments (APP-033) remains valid.</p>
RR-033.41	<p><b>Marine mammal comments</b></p> <p>The following documents were reviewed in providing this response: Environmental Statement: ? Volume 1, Chapter 5: Environmental impact assessment methodology ? Volume 2, Chapter 4: Marine mammals ? Volume 2, Chapter 11: Inter-</p>	<p>The Applicant notes JNCC's response.</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>related effects – Offshore ? Volume 5, Annex 3.1: Underwater sound technical report ? Volume 5, Annex 5.1: Cumulative effects screening matrix ? Volume 6, Annex 4.1: Marine mammal technical report ? Volume 8, Annex 2.2: Climate change risk assessment HRA: ? Stage 1 Screening report ? Stage 2 Information to support an Appropriate Assessment ? Part 1, Introduction and background ? Part 2, Special Areas of Conservation (SAC) assessments ? HRA integrity matrices Offshore Plans: ? Mitigation and monitoring schedule ? Outline underwater sound management strategy ? Outline offshore operations and maintenance plan ? Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels ? Outline marine mammal mitigation protocol.</p>	
RR-033.42	<p><b>Overall comments</b></p> <p>JNCC previously provided comment on the Mona Offshore Wind Project Preliminary Environmental Information Report (OIA Reference OIA-09444, dated 1 June 2023). Our current review and subsequent comments have focussed on outstanding issues with particular attention given to the information to support HRA and proposed mitigation measures. We maintain our advice that unexploded ordnance (UXO) clearance is not included as a licensed activity in the DCO/marine licence (particularly high order clearance) due to the lack of information available and the over precaution that must be incorporated into the impact assessment at this stage. For example, Section 1.6.2.1 of the draft Sound Management Strategy states the likely maximum size of UXO to be encountered is 130kg Net Explosive Quantity (NEQ), however, it also states the size of device could range between 25kg and 907kg. Without further information on what size of devices will need to be cleared, and confirmation of what clearance method will be used, the impact assessment (and associated mitigation plans) must consider the worst-case scenario, i.e. all clearances will involve high order detonation of a 907kg device. This is contrary with the Government et al. Joint Position Statement (for which an update will be published</p>	<p>UXO clearance has been included in the Application and assessed within Volume 2, Chapter 4: Marine mammals (APP-056) and the HRA Stage 2 Information to Support an Appropriate Assessment (ISAA) E1.2 Part Two: Special Areas of Conservation (SACs) Assessments (APP-032). The assessment is based on the maximum potential UXO size (907 kg) and identified a potentially significant effect. However, the assessment presented in Volume 2, Chapter 4: Marine mammals (APP-056) highlights that the likelihood of a high order clearance is low, and a staged mitigation hierarchy has been proposed (see below). The final Marine Mammal Mitigation Protocol (MMMP) and Underwater Sound Management Strategy (UWSMS), will be produced, post consent and will rely on 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.</p> <p>The assessment has considered the maximum adverse scenario, which in this case is high order clearance, but the Applicant highlights its commitment to the mitigation hierarchy with respect to UXO clearance which is centred on a staged approach (see Outline MMMP (APP-207)), in line with the Joint Position Statement, that follows:</p> <ul style="list-style-type: none"> <li>• Avoid UXO.</li> <li>• Clear UXO with low order techniques.</li> <li>• Clear UXO with high order techniques.</li> </ul> <p>As demonstrated, the Applicant has committed to prioritising low noise clearance methods and using high order clearance only in exceptional circumstances.</p>

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	<p>this month), which states low noise methods of clearance should always be prioritised with high order clearance only to be used in exceptional circumstances.</p>	<p>The Outline UWSMS (APP-202) is based upon the Maximum Design Scenario (MDS) at this current stage and will be refined post consent following the site-investigation surveys, which will identify the exact UXO to be cleared, and mitigation will be tailored accordingly.</p> <p>Furthermore, Condition 21 of the Draft DCO (C1 Draft Development Consent Order F03) requires a method statement for UXO clearance to be submitted to, and approved by, NRW before any removal or detonation of UXO can take place.</p>
RR-033.43	<p>While noise abatement for piling (described as a secondary mitigation measure) is now referred to in the impact assessment and mitigation plans, in practice it is considered last in the mitigation hierarchy i.e. after measures built into the project design and the use of marine mammal observers/acoustic deterrents. We are aware that Defra will be publishing a noise policy paper soon (announced at the Marine Management Organisation, MMO, workshop, 13 March 2024) which will include the expectation from the MMO that all offshore wind pile driving activity in English waters to demonstrate that they have utilised best endeavours to deliver noise reductions through the use of primary and/or secondary noise mitigation methods in the first instance from January 2025. While the array area for this project no longer overlaps with English waters, we strongly recommend that noise abatement and/or the use of alternative hammers are considered as a key part of the noise mitigation plan, with the assumption that it will be used as appropriate to it may/could be. Such an approach will also support future European Protected Species (EPS) licence applications if required (use of alternatives), which are usually applied for post-consent.</p>	<p>The Applicant notes the pending noise policy paper from Defra, announced at the Marine Management Organisation (MMO) workshop, 13 March 2024, with our marine mammal specialists in attendance. The Applicant will consider the noise policy paper when published.</p> <p>The Outline UWSMS (APP-202) details the approach to deliver sound reduction through the use of primary and/or secondary sound mitigation methods (which considers sound abatement systems) and will be finalised post consent in the final UWSMS. Therefore, sound abatement technologies are already considered, in accordance with the mitigation hierarchy, which focuses on a staged approach (see response to RR-033.42). Specific measures will be agreed post-consent as part of the final UWSMS.</p> <p>The UWSMS is a comprehensive approach that has not previously been adopted by other recently consented offshore wind farm projects. This demonstrates the Applicant's commitment to utilising best endeavours to reduce the noise impacts of the Mona Offshore Wind Project.</p> <p>Even though the Mona Array Area sits in Welsh waters, noise abatement systems (NAS), alternative hammers and other measures are considered as part of the Outline UWSMS (APP-202), and will be finalised post consent with relevant stakeholders, including JNCC. The Defra noise policy paper will also be considered for relevant future European Protected Species (EPS) licence applications.</p>
RR-033.44	<p><b>General comments</b></p> <p>We highlight the following for information:</p> <p>JNCC (in collaboration with the other SNCBs) will be reviewing the current Effective Deterrent Ranges (EDRs) this coming year and identify new ones for activities not currently included (e.g. Acoustic Deterrent Devices, ADDs).</p>	<p>The Applicant notes JNCC's comment.</p>

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	Once available, these should be used in future assessments.	
RR-033.45	JNCC will be publishing new mitigation guidance specifically for when clearing UXO within the next month. We advise that the most recent guidance is used to inform future UXO clearance licence application and subsequent marine mammal mitigation plans.	The Applicant notes JNCC's response and will review the new UXO clearance mitigation guidance, when available.
RR-033.46	An addendum to the SNCB mitigation guidance for piling will be published in the next two months, to bring the 2010 guidance up to date and reflect the preference for noise abatement to be used to mitigate impacts from noise.	The Applicant notes JNCC's response and will review the addendum to the SNCB mitigation guidance for piling when it is available.
RR-033.47	<p><b>HRA Stage 1 Screening report</b></p> <p>Table 1.6: This document states that the distance to the North Anglesey Marine SAC from the Mona Array Area is 22.58km, whereas in other documents it is stated as 23.67km. Please clarify and ensure consistency between documents.</p>	The Applicant thanks JNCC for highlighting this consistency error, the correct distance is 23.67 km, however this does not change the assessment and the conclusions of the screening report still stand.
RR-033.48	Section 1.4.5, Table 1.125 and Paragraph 1.6.1.5: JNCC agree with the conclusion of potential LSE on the North Anglesey Marine SAC due to underwater sound from piling, and UXO clearance. We advise LSE is unlikely for the other harbour porpoise sites due to their distance from the proposed project.	The Applicant welcomes this feedback and confirmation of agreement with the conclusion of potential LSE on the North Anglesey Marine SAC due to underwater sound from piling, and UXO clearance.
RR-033.49	<p><b>HRA Stage 2 Information to support an Appropriate Assessment</b></p> <p>We defer to NRW-A regarding SACs in territorial waters e.g. for seals and bottlenose dolphins. We agree with the use of EDRs to assess disturbance within the harbour porpoise SACs and assess overlap in the context of published temporal-spatial thresholds.</p>	The Applicant notes JNCC's response.
RR-033.50	Table 1.78: We question why the Bristol Channel Approaches SAC has been included here, whilst the West Wales Marine SAC has not? Bristol Channel Approaches	The Applicant notes JNCC's response and thanks you for highlighting that this site was missed in error from Table 1.78. However, West Wales Marine SAC has been considered in line with the iterative approach in the Stage 2 ISAA Part Two: Special Areas of Conservation (SACs) Assessments (APP-032) for Annex II

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	SAC lies 274.8km from the Array Area, whereas West Wales Marine SAC is considerably closer (95.4km).	marine mammal feature harbour porpoise, for the Construction/decommissioning (e.g. piling assessed in paragraph 1.7.3.89 for the Mona Offshore Wind Project alone, and 1.7.4.89 in combination with other plans/projects) and Operations and maintenance phases. The Stage 2 ISAA Part Two: Special Areas of Conservation (SACs) Assessments (APP-032) concluded no adverse effect on the integrity of the site from the Mona Offshore Wind Project alone or in-combination with other plans and projects.
RR-033.51	Table 1.84: We reiterate our advice that UXO clearance is not included in the DCO as a licensed activity. We do, however, agree with the hierarchy provided here with regard to clearance options, i.e. that low order will be considered before high order, as required in the Government et al. UXO position statement.	The Applicant has updated the draft DCO (C1 Draft Development Consent Order F03) to include reference to UXO clearance in the deemed marine licence list of licensable activities. See also the Applicants response above to UXO clearance on the mitigation hierarchy (RR-033.42).
RR-033.52	Table 1.100: This presumes the worst-case scenario that all UXOs would require high order clearance and applies the maximum 26km EDR. Submitting a separate application for UXO clearance once it is known precisely what is required would enable this assessment to be more realistic and not be over precautionary.	The Applicant notes JNCC's response. See also the Applicants response above regarding UXO clearance (RR-033.42). Final UXO mitigation will be discussed in detail and agreed with stakeholders post-consent during the development of the Final MMMP and Final UWSMS and once pre-construction surveys have been conducted. These documents will be based upon the realistic UXO clearance scenario, but at this stage the most precautionary approach has been taken and the worst-case scenario used in the assessment.
RR-033.53	<p><b>Outline underwater sound management strategy</b></p> <p>Overall, we agree in principle with the plan to develop an underwater noise strategy, and that it should identify all potential noise sources associated with the project with further detail provided in associated mitigation plans. We also agree the draft strategy could be finalised post-consent (following refinement of the project design and further surveys being undertaken), provided we are confident the information to be provided within the final strategy will demonstrate potential impacts to marine mammals from noisy activities can be adequately mitigated/managed. The information provided in the current draft is, however, incomplete. We note the following in the draft document provided:</p>	The Applicant welcomes JNCC's response on the Outline UWSMS (APP-202) and agreement that it can be finalised post-consent, following refined project design and site-investigation surveys.



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Reference	Relevant Representation Comment	Applicant's response
RR-033.54	Generally, the proposed layout is acceptable however we recommend that Section 1.6 (construction activities) includes some information on how the design envelope has changed, rather than only discussing it in Section 1.7.	The Applicant notes JNCC's response and highlights the UWSMS is a live document that can be updated following such feedback. The Applicant will add further detail on the changes of the project design envelope (PDE) to the requested Section 1.6 in the final UWSMS issued post-consent.
RR-033.55	Noise abatement for piling is considered a secondary mitigation measure however the implication is that in practice, it will be considered last in the mitigation hierarchy. The use of noise abatement should be given more serious consideration, and we encourage investigating the feasibility of using hammer types that will result in lower levels of noise such as the Menck system mentioned in paragraph 1.8.2.11.	<p>The Applicant notes JNCC's response, and highlights section 4.9 in Volume 2, Chapter 4: Marine mammals (APP-056), which details 'measures adopted as part of the project', which includes measures as part of the project design (referred to as primary mitigation in IEMA (2016)) and measures required to meet legislative requirements or standard practice (referred to as tertiary mitigation in IEMA (2016)). Where potential significant effects have been identified even with the use of primary/tertiary measures, further mitigation measures are considered, which are referred to as secondary mitigation in IEMA (2016). Therefore, where significant effects are possible from the Mona Offshore Wind Project, further (termed 'secondary') mitigation measures are considered, which includes consideration of noise abatement technologies.</p> <p>The Final UWSMS will look at the range of NAS technologies available and will likely include hammer types that result in lower sound levels, if possible and necessary.</p>
RR-033.56	<p>We reiterate our advice that UXO clearance is not included as a licenced activity in the DCO/marine licence (particularly high order clearance) due to the lack of information available and the over precaution that must be incorporated into the impact assessment at this stage. For example, Section 1.6.2.1 of the strategy states the likely maximum size of UXO to be encountered is 130kg NEQ, however, it also states the size of device could range between 25kg and 907kg. Without further information on what size of devices will actually need to be cleared, and confirmation of what clearance method will be used, this strategy (and associated mitigation plans) must consider the worst-case scenario presented within the ES (907kg) and describe mitigation measures that will reduce those predicted impacts. We do, however, agree to UXO clearance being included in this document at this stage as the strategy represents a holistic view of all noisy activities.</p> <p>In line with the Governments Joint Position Statement (for which an update will be published this month), low noise</p>	The Applicant welcomes JNCC's agreement that UXO clearance is included in the UWSMS to represent a holistic view of activities that may generate elevated underwater sound. See also the Applicant's responses above to UXO clearance (RR-033.42). The Applicant notes the pending update to the Joint Position Statement and will consider the guidelines when published.

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Reference	Relevant Representation Comment	Applicant's response
	methods of clearance should always be prioritised with high order clearance only to be used in exceptional circumstances.	
RR-033.57	JNCC do not recommend the use of scare charges prior to UXO clearance as a form of soft start (Section 1.5.4.3).	The Applicant notes the advice on scare charges and highlights that this was discussed in the Marine Mammal EWG07 (see Technical Engagement Plan (APP-041) and minutes of the EWG meetings in Appendix C of the Technical Engagement Plan Appendices Part 1 (A to E) (APP-042)). The Applicant requested guidance for alternatives during this meeting, and JNCC and Natural England advised that they provide advice for projects on a case-by-case basis (such as an extended pre-search and proven ADDs). Therefore, the Applicant will seek project-specific recommendations in developing the final MMMP and UWSMS in consultation with relevant stakeholders, including JNCC.
RR-033.58	It is unclear why this document only appears to be focussing on two marine mammal species (bottlenose dolphin and harbour porpoise). Without mitigation, all marine mammals are sensitive to injury and disturbance from piling and UXO clearance; and as European Protected Species, all cetacean species are protected from both throughout their natural range. While some species may be more abundant in the development area, the current wording suggests (incorrectly) that only two species are at risk.	The UWSMS applies to all marine mammal and fish species and mitigation is relevant to all receptors sensitive to underwater sound. However, the UWMS targets species where a residual significant effect has been identified that cannot be mitigated by the MMMP alone. The UWSMS also provides mitigation for fish receptors which are not covered by the MMMP. The wording in the Final UWSMS will be updated post-consent to provide this clarity.
RR-033.59	<p><b>Mitigation and monitoring schedule</b></p> <p>The purpose of this document is to demonstrate how the Mona Offshore Wind Project has considered mitigation and monitoring commitments regarding environmental impacts identified through the Environmental Impact Assessment. Table Ref 29-34: JNCC agrees with the commitment to develop and adhere to a Marine Mammal Mitigation Plan; see below for comments on the plan provided.</p>	The Applicant notes JNCC's response.
RR-033.60	Ref 35: The Underwater Sound Management Strategy (UWSMS) is J16 of the Marine Plan, and not J19 as stated here.	The Underwater Sound Management Strategy is document J16 (APP-202) as correctly stated by JNCC.
RR-033.61	<p><b>Outline Offshore Operations and Maintenance Plan</b></p> <p>We encourage the developer to submit spatial and temporal information data on all licensed noisy activities to the Marine</p>	The Applicant notes JNCC's response. Submission of data to the marine noise registry is secured in Schedule 14, Condition 29 of the Draft DCO (C1 Draft Development Consent Order F03).

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	<p>Noise Registry (MNR), including geophysical surveys which do not require a marine licence. This information will be added to other data provided for licensed activities therefore helping generate a more accurate picture of impulsive noise occurring in UK waters. The MNR is an online platform administered by JNCC for industry and regulators to enter activity information including location, date, and source property data.</p>	
RR-033.62	<p><b>Outline marine mammal mitigation protocol</b></p> <p>In line with our previous advice that UXO clearance is not included as a licenced activity in the DCO/deemed marine licence, we do not recommend that a single mitigation plan is developed for this and piling. Instead, a separate Marine Mammal Mitigation Protocol (MMMP) should be developed to support any future licence application. To support this, we highlight that:</p>	<p>See the Applicant's responses above to UXO clearance (RR-033.42).</p>
RR-033.63	<p>Defra will be publishing an update to the Government et al. UXO position paper in the next month. This strengthens the requirement to prioritise low noise methods of clearance and provides guidance on suitable evidence to support the use of such methods.</p>	<p>The Applicant notes JNCC's response. See also the Applicants response above to the UXO position paper and UXO hierarchy (RR-033.42).</p>
RR-033.64	<p>JNCC will be publishing new mitigation guidelines specifically for when clearing UXOs in the next month. These should be considered when designing mitigation plans for this activity.</p>	<p>The Applicant notes JNCC's response and will consider the mitigation guidelines specific for UXO clearance when it is published.</p>
RR-033.65	<p>JNCC do not advocate the use of scare charges as a soft start for UXO as their scaring effect is not proven (Lewis 1996, Keevin and Hempen 1997), and would result in unnecessary additional noise being emitted into the environment.</p>	<p>The Applicant notes the advice from JNCC on scare charges. See also the Applicants response above to this advice.</p>
RR-033.66	<p>The mitigation zone should cover the full range of predicted injury and not be restricted to the 1km referred to in the 2010 guidelines. A minimum radius of 1km should be applied.</p>	<p>The Applicant notes the advice on a minimum 1 km radius and will incorporate this in the final MMMP and UWSMS, in consultation with relevant stakeholders including JNCC.</p> <p>For UXO, the Outline MMMP (APP-207) states "<i>following the JNCC (2010b) guidelines, a pre-detonation monitoring of at least 1 km zone should be conducted</i></p>

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		<p>by MMO in order to reduce the risk of marine mammals being present within this area". The Applicant notes this is not a finite distance and will be adapted to the exact number and size of UXO required to be cleared following further information post consent, with more detailed information from site investigation surveys.</p>
RR-033.67	<p>Two marine mammal observers should be used to reflect the size of the mitigation zone. If Passive Acoustic Monitoring (PAM) is to be used to supplement the visual searches, an additional team member will be required to monitor this (so three in total).</p>	<p>The Applicant notes the advice from JNCC on the use of two marine mammal observers to reflect the size of the mitigation zone. The Outline MMMP (APP-207) states "A minimum number of MMOs will be agreed with NRW (as the licensing authority) post-consent. Marine mammal observers should be present in sufficient numbers to ensure that monitoring is not compromised by fatigue" and the Applicant therefore welcomes the advice from JNCC, to aid discussions with the licencing authority in finalising the Final MMMP and UWSMS post-consent.</p>
RR-033.68	<p>UXO clearance should not be undertaken at night or during periods of limited visibility. JNCC recently published guidance on the use of PAM as mitigation, which may be found here <a href="https://hub.jncc.gov.uk/assets/fb7d345b-ec24-4c60-aba2-894e50375e33">https://hub.jncc.gov.uk/assets/fb7d345b-ec24-4c60-aba2-894e50375e33</a>. We recommend that this guidance is considered when finalising the piling MMMP. An update to McGarry et al. (2017) reviewing evidence to support the use of ADDs is being finalised and will be available soon and additional guidance for when using ADDs is currently being developed; refer to the JNCC webpage for updates. JNCC currently advise that a visual search is undertaken prior to activating ADDs and visual searches should be adapted to accommodate this. Paragraph 1.7.2.3 states that 'PTS onset ranges will be further reduced by the application of ADDs'. This is incorrect. The Permanent Threshold Shift (PTS) onset range remains the same, the ADD is used to encourage animals to leave this area before the sound source is activated.</p>	<p>The Applicant notes JNCC's advice on UXO clearance and use of PAM as mitigation guidance and will consider it for the Final MMMP post-consent.</p> <p>The Applicant is aware of the ADD review and will consider both the report and the additional ADD guidance when published. The Applicant notes the advice that a visual search is undertaken prior to activating ADDs and will incorporate this in the final MMMP and UWSMS, in consultation with relevant stakeholders, including JNCC.</p> <p>The Applicant notes the wording surrounding paragraph 1.7.2.3 of the Outline MMMP (APP-207) and agrees the ADD is used to encourage animals to leave this area before the sound source is activated rather than reducing PTS onset ranges. The Applicant will make sure this is corrected in the Final MMMP post-consent.</p>
RR-033.69	<p><b>Volume 6, Annex 4.1: Marine mammal technical report</b></p> <p>We previously requested that a qualitative review of survey coverage during baseline aerial surveys be provided to better understand the value of the survey data. For example, was coverage even and were key areas of the Mona array areas covered by the surveys? We note the proportion of the survey area analysed has increased from 12 to 15% however our previous comment remains valid. It would also</p>	<p>The Applicant notes that the final densities taken forward to assessment, as agreed through the marine mammal Expert Working Group (EWG) (see Technical Engagement Plan [APP-041] and minutes of the EWG meetings in Appendix C of the Technical Engagement Plan Appendices Part 1 (A to E) (APP-042)) are derived from the Welsh Marine Mammal Atlas (Evans and Waggitt, 2023), SCANS III densities (Hammond <i>et al.</i>, 2021) or seal at-sea usage maps (Carter <i>et al.</i>, 2022), rather than the estimates from digital aerial survey (DAS). Therefore, further detail on digital aerial survey estimates would not change the outcome of the</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>be beneficial to understand how this increase have been achieved and what benefits are provided.</p>	<p>assessment and therefore, the Applicant does not consider further qualitative review necessary. JNCC stated in response to Marine Mammal EWG05 (see Technical Engagement Plan (APP-041)) that they were happy with the densities for the specified marine mammal species on the basis that they are either the most site-specific, or the most precautionary.</p> <p>The Applicant notes the request for a qualitative review of survey coverage during baseline aerial surveys. Discussion on the survey coverage is provided in Appendix A of the Marine Mammal Technical Report (APP-090), which states “Coverage was evenly spaced over the survey areas” and monthly survey effort across the Mona Aerial Survey Area (which covers the entirety of the Mona Array Area, plus a 10 km buffer) is presented in Table A.1 both as an area (km<sup>2</sup>) and a percentage. The aerial survey report was updated at the Environmental Statement stage, following s42 feedback on the PEIR, and survey coverage was reported per survey month in Table A.1, with an average across all months of 15.204 %.</p> <p>Monthly aerial survey reports (which were not presented in Appendix A of the Marine Mammal Technical Report (APP-090) for conciseness) from APEM Ltd showed the image node capture points per monthly survey. For all months within the two years of Digital Aerial Surveys (DAS), the coverage of the Mona Aerial Survey Area was evenly spaced, well covered and with no missing areas of coverage. The entire Mona Array Area was well covered in every monthly survey (see Volume 6, Annex 4.1, Appendix A: Marine Mammal Aerial Survey Data Analyses (APP-090)).</p>
RR-033.70	<p><b>Benthic ecology (offshore)</b></p> <p>The following documents were reviewed in providing this response: Environmental Statement: ? Volume 1, Chapter 3: Project Description ? Volume 1, Chapter 5: Environmental Impact Assessment Methodology ? Volume 2, Chapter 1: Physical Processes ? Volume 2, Chapter 2: Benthic subtidal and intertidal ecology ? Volume 2, Chapter 11: Inter-related Effects – Offshore ? Volume 5, Annex 5.1: Cumulative effects screening matrix ? Volume 5, Annex 5.2: Transboundary impacts screening. ? Volume 6, Annex 1.1: Physical Processes Technical Report ? Volume 6, Annex 2.1: Benthic Subtidal and Intertidal Ecology Technical Report HRA: ? Stage 1 Screening report ? Stage 2 Information to support an Appropriate Assessment ? Part 1, Introduction and background ? HRA Integrity Matrices ? Marine Conservation Zone Screening Report Offshore Plans: ?</p>	<p>The Applicant notes JNCC’s response.</p>

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Reference	Relevant Representation Comment	Applicant's response
	Offshore In-Principle Monitoring Plan ? Mona Array Area – Site Characterisation Report ? Offshore Cable Corridor Site Characterisation Report The following advice relates to the offshore environment, extending out from the 12nm limit. For benthic ecology advice within 12nm, we defer to Natural Resources Wales (NRW).	
RR-033.71	Overall comments JNCC are of the opinion that not all seabed impacts have been fully considered and it was not always clear that the correct footprint values have been utilised within the analysis or between chapters. Further detail of this is provided in the below sections. JNCC do not agree with the values attributed within the assessment of significant effects, covered in Sections 2.9 and 2.11 of Volume 2, Chapter 2. The magnitude of impact has been assessed too low, incorrect assumptions of feature sensitivity has been applied to the seapens and burrowing megafauna communities Important Ecological Features (IEF), and the subsequent adverse significance has been under-represented. As an example, taking the 'as is' situation with a 'Low' magnitude of impact and a 'High' sensitivity, the adverse significance would be 'Minor or Moderate', as detailed on page 17 of Volume 1, Chapter 5, but has been reported as 'Minor'. We believe it would be more appropriate to take the worst-case scenario and apply a 'Moderate' adverse significance. We would therefore recommend that, as a minimum, all significance of effect be reassessed taking into account the worst-case scenario.	<p>The assessments presented in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) have been undertaken to ensure the most precautionary sensitivity is applied when combining pressures.</p> <p>The site-specific benthic surveys identified very few burrows at stations where soft sediment was dominant. In combination with an absence of seapens and the predominantly gravelly sediment, it was concluded that these areas only had a negligible resemblance to the 'seapens and burrowing megafauna communities' habitat. Therefore, a precautionary approach was adopted for stations where burrows were observed at an average SACFOR of 'frequent', and these stations were, for the purposes of the assessment, assumed to represent the 'seapens and burrowing megafauna communities' habitat.</p> <p>The sensitivity allocated to the seapens and burrowing megafauna communities Important Ecological Feature (IEF) was based on the high sensitivity allocated in the Marine Evidence based Sensitivity Assessment (MarESA) to the relevant impacts (abrasion/disturbance at the seabed, penetration of the substratum subsurface and heavy smothering). This sensitivity rating is primarily driven by the fragile nature of seapens as an epifaunal species. The site-specific surveys identified few burrows and no seapens within the Mona Offshore Wind Project therefore, the sensitivity associated with this habitat was reduced to medium.</p> <p>An example of expert judgement being applied in regard to sensitivity is in the Berwick Bank Offshore Windfarm fish and shellfish assessment of injury and disturbance from underwater noise and vibration. In this assessment following consideration of the distance between the site of impact and the nearest herring spawning area herring which are normally allocated a sensitivity of high to this impact were instead allocated the sensitivity of medium (SSE Renewables, 2023<sup>4</sup>).</p>

<sup>4</sup> SSE Renewables (2023) Berwick Bank Wind Farm Offshore EIA Report Volume 2, Chapter 9: Fish and Shellfish Ecology, Available at: <https://berwickbank-eia.com/offshore-eia/vol2-ch09-fish-and-shellfish-ecology/>, Accessed May 2024.

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		<p>Therefore, the Applicant considers that the assessment of the 'seapens and burrowing megafauna communities' habitat is sufficiently precautionary in this regard. Furthermore, to have adopted the full MarESA sensitivities, without amending for the particular sensitivity of seapens, would have over-estimated the impact to the specific habitat present in the Mona Offshore Wind Project. The Applicant is confident that the impacts to the seapens and burrowing megafauna communities Important Ecological Features will be no greater than minor adverse significance and are therefore not significant in EIA terms (Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054)).</p> <p>In accordance with the EIA methodology followed for the Mona Offshore Wind Project, as detailed in Volume 1, Chapter 5: Environmental Impact Assessment methodology (APP-052), 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. Where this has been undertaken in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), explanations are provided in the text to support the conclusions. This approach is supported by the general approach described in the Design Manual for Roads and Bridges, which suggests an evidence-based approach when reviewing the multiple outcomes presented in the conclusion of the effects matrix, as applied in this scenario regarding the lack of seapens identified in the site-specific surveys. This approach has been applied throughout Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054). For example, in paragraph 2.9.2.47, for the littoral sand and muddy sand supporting infaunal communities IEF, the low magnitude and high sensitivity resulted in a minor or moderate result in the significance matrix. A conclusion of minor adverse significance was determined due to the small scale of the work in the intertidal zone.</p>
RR-033.72	<p>In Section 5.3.6.8 and Table 5.4, of Volume 1 Chapter 5, the spatial extent of the impact is defined as "Geographical area over which the impact may occur". Including the whole licence area as the spatial extent is not proportionate to the identified impact pathway especially if the whole area has no opportunity to be impacted. This then gives an unrealistic percentage of impact area and subsequently a magnitude of impact that is not representative. Some more detailed examples are covered for specific sections below but we</p>	<p>Table 5.4, of Volume 1, Chapter 5: Environmental Impact Assessment methodology (APP-052) explains that topic-specific definitions for the magnitude categories are provided in each of the topic chapters. The definitions relevant to the assessment of magnitude for benthic subtidal and intertidal ecology are as outlined in Table 2.14 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054). The assessments of magnitude have been based on the total areas of habitat disturbance/loss (in m<sup>2</sup>/km<sup>2</sup>) with percentages of the project areas affected presented to provide additional context.</p>

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RR-033.73	<p>would recommend that all magnitude of impacts are re-assessed taking this into account.</p> <p>JNCC have concerns around the expected decommissioning of the infrastructure, in particular around the decommissioning of gravity-based infrastructure and the full removal of all cables. Lessons learnt from the oil and gas industry have shown that the decommissioning of gravity-based infrastructure is not always feasible, or possible, leading to permanent habitat change. The impacts of this scenario should be considered.</p>	<p>As outlined in section 3.13 of Volume 1, Chapter 3: Project description (APP-050), no offshore decommissioning works will take place until a written decommissioning programme has been approved by the Secretary of State for the Department for Energy Security and Net Zero, a draft of which will be submitted prior to the construction of the Mona Offshore Wind Project. The scope of the decommissioning works would be determined by the relevant legislation and guidance at the time of decommissioning (i.e. including latest guidance on best practice for the decommissioning of cables).</p> <p>Gravity based infrastructures will all be removed upon decommissioning of the Mona Offshore Wind Project. At the end of the operational lifetime of the Mona Offshore Wind Project, the maximum design scenario for hard substrate removal includes the removal of all structures above the seabed or ground level including wind turbine foundations (including gravity based foundations), OSP foundations, scour protection, cable protection and protection for cable crossing. However, the maximum design scenario for long term habitat loss has assumed that cable and scour protection may be left <i>in situ</i> and the wind turbine foundations will be removed, including gravity based foundations. These are the scenarios that have been assessed in the Environmental Statement. Any deviation from this would be considered and assessed as part of the decommissioning programme at the time of decommissioning.</p>
RR-033.74	<p>JNCC welcomes the proposal to remove all cabling from the Array Area and Cable Corridor. Based on our current experience, this is not always possible, especially when the cable is buried. Leaving buried cables in situ and removing un-buried sections would normally include protection of the cut end with rock dump increasing the final footprint of the project. Although JNCC acknowledge future advancement of decommissioning technology may solve this issue, this scenario has not been considered.</p>	<p>The maximum design scenario for temporary habitat disturbance has assessed the removal of all cables, which could require the use of similar equipment as used to install the cables as set out in Section 3.13.2 of Volume 1, Chapter 3: Project description (APP-050). However, the Applicant has not committed to the removal of cables in the decommissioning phase and the decision on whether to remove offshore cables will be taken at the time of decommissioning in consultation with the relevant stakeholders.</p> <p>The project design assessed in the Environmental Statement does not include additional cable protection to be installed at the point of decommissioning. Given the uncertainty regarding the relevant legislation and guidance at the time of decommissioning, deviation from this would be considered and assessed as part of the decommissioning programme at the time of decommissioning. Should rock bags be required to ensure that decommissioned cable ends do not become a hazard to navigation or fishing, a Marine Licence application would be required as part of the decommissioning plan (as stated in APP-050).</p>



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Reference	Relevant Representation Comment	Applicant's response
RR-033.75	<p><b>Volume 1, Chapter 3: Project Description</b></p> <p>Section 3.5.4.3, page 10: "If Mona infrastructure crosses any out of service cables, these will be removed where feasible." It is not clear if any remediation (i.e. rock dump for protection) will be carried out on the cut ends of the out of service cables left on the seabed.</p>	<p>The Applicant can confirm that in relation to Section 3.5.4.3 of Volume 1, Chapter 3: Project Description (APP-050), any cable removal will be undertaken in consultation with the asset owner and in accordance with the International Cable Protection Committee (ICPC) guidelines (2011). Where feasible, cables will be retrieved to a vessel deck, where one end will be cut, the cable will be pulled past the crossing point, and then cut again before being pulled to the surface where it will be removed from site by the vessel.</p>
RR-033.75	<p>Table 3.4, page 12: As the cable corridor includes both the inshore and offshore (outside 12nm) waters, it is not possible to determine the maximum design parameters for sandwave clearance in the offshore. We assume that the majority of sandwave clearance within this area will be inshore.</p>	<p>The maximum design scenario for sandwave clearance along the offshore export cable has not been sub-divided to offshore and inshore waters. Final requirements for sandwave clearance will be based on pre-construction site investigation and final detailed design and set out in the construction method statement required to be approved by the licencing authority as secured under Schedule 14, Condition 18(1)(d) of the Draft DCO (APP-023).</p>
RR-033.76	<p>Table 3.11 and 3.12, page 22, and Tables 3.14 to 3.17, pages 25 to 28: Values for the maximum seabed area (total foundations and scour protection for all foundations) were found to be incorrect in all six of the above listed tables. Assuming the values for the maximum seabed area per foundation and scour protection per foundation are correct, the total foundations and scour protection for all foundations values were found to be significantly underestimated (see table below). By our calculations, the following totals should be:</p> <p>Table 3.11: Original total = 284,360m<sup>2</sup>; corrected total* = 401,472m<sup>2</sup>; underestimated difference = 117,112m<sup>2</sup></p> <p>Table 3.12: Original total = 10,745m<sup>2</sup> ; corrected total* = 35,336m<sup>2</sup>; underestimated difference = 24,591m<sup>2</sup></p> <p>Table 3.14: Original total = 735,488m<sup>2</sup>; corrected total* = 1,038,336m<sup>2</sup>; underestimated difference = 302,848m<sup>2</sup></p> <p>Table 3.15: Original total = 24,964m<sup>2</sup> ; corrected total* = 60,116m<sup>2</sup>; underestimated difference = 35,152m<sup>2</sup></p> <p>Table 3.16: Original total = 612,084m<sup>2</sup>; corrected total* = 724,896m<sup>2</sup>; underestimated difference = 112,812m<sup>2</sup></p> <p>Table 3.17: Original total = 24,941m<sup>2</sup> ; corrected total* = 74,508m<sup>2</sup>; underestimated difference = 49,567m<sup>2</sup></p>	<p>The Mona Offshore Wind Project has adopted a maximum design scenario approach which allows the EIA process to be conducted on the basis of a realistic 'worst case' scenario (i.e. the maximum project design parameters) which is selected from different design and construction scenarios. Therefore, it is not appropriate to multiply the maximum number of turbines specified in Volume 1, Chapter 3: Project description (APP-050) by the maximum seabed area per foundation as that is not a what is being applied for in relation to the Mona Offshore Wind Project (as set out in Table 3.5 of Volume 1, Chapter 3: Project description (APP-050)).</p> <p>The values for total seabed take and volumes of scour protection/drill arising etc., as specified in the DCO, are correct and accurate and will not be exceeded. The information provided in Table 3.11, 3.12, 3.14, 3.15 and 3.16 in Volume 1, Chapter 3: Project description (APP-050) represents the maximum for each parameter however this does not represent the maximum design scenario (i.e. all of these parameters would not occur in one scenario).</p> <p>For example the maximum total seabed footprint for wind turbine generators (including scour protection) of 735,488 m<sup>2</sup> is the result of a scour protection area of 10,012 m<sup>2</sup> plus a foundation area of 804 m<sup>2</sup> multiplied by 68 (the maximum number of wind turbines with jacket foundations associated with this seabed footprint scenario).</p> <p>The corresponding scenario quoted by JNCC uses all the maximum values to create a maximum total seabed footprint for wind turbine generators (including scour protection) of 1,038,336 m<sup>2</sup> (the result of a scour protection area of</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>* This is based on our interpretation of the data within the ES, notwithstanding our comments above on the numerous numerical errors throughout the ES.</p>	<p>10,012 m<sup>2</sup> plus a foundation area of 804 m<sup>2</sup> multiplied by 96 turbines) however this is not a viable scenario for this project and the maximum footprint for wind turbine generators has therefore not been underestimated. The same reasoning applies for the other scenarios outlined by JNCC.</p> <p>Whilst not all of these scenarios have been presented in Volume 1, Chapter 3: Project description (APP-050), for each of the relevant assessments the maximum design scenario has been applied and is presented in the relevant chapter.</p>
RR-033.77	<p>Section 3.5.8.7, page 23: Drill arisings from drilling of pin piles will create cuttings piles. A maximum seabed impact area should be calculated for these as cutting piles will impact the local environment and should be considered in more detail.</p>	<p>The Mona Offshore Wind Project has adopted a maximum design scenario approach which allows the EIA process to be conducted on the basis on a realistic 'worst case' scenario (i.e. the maximum project design parameters) which is selected from different design and construction scenarios. Seabed preparation works prior to suction bucket jacket installation represents the maximum design scenario, with respect to spatial extent for temporary habitat loss accounting for 16,833,242 m<sup>2</sup> of disturbance (as a result of 8,416,621 m<sup>3</sup> of sediment deposited at a depth of 0.5 m). The temporary habitat loss associated with drill arisings resulting from jacket foundation installation is considered to fall within the area of disturbance described for seabed preparation for the foundations. Additionally paragraph 1.9.2.8 of Volume 2, Chapter 1: Physical Processes highlights that sedimentation beyond the immediate drilling location will be indiscernible. The Mona Offshore Wind Project has committed to depositing material arising from drilling in close proximity to the works (Table 2.19 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054)).</p>
RR-033.78	<p>Section 3.13.2.3, page 80: Wording in relation to cable decommissioning was found to be inconsistent between documents. This section suggests cables "may be retrieved" at decommissioning while Volume 2, Chapter 2, 'Mona ES Benthic subtidal and intertidal ecology' (Table 2.18, page 79) states all cables "will be removed" at decommissioning. JNCC assume all cables will be removed at decommissioning but this needs to be clarified by the applicant.</p>	<p>The Applicant has not committed to the removal of cables in the decommissioning phase and the decision on whether to remove offshore cables will be taken at the time of decommissioning in consultation with the relevant stakeholders. The Applicant has, however, adopted a maximum design scenario approach and given that there is the possibility that all cables may be removed, as outlined in Volume 1, Chapter 3: Project description (APP-050), this has been assessed as the maximum design scenario for relevant impacts such as temporary habitat disturbance in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054).</p> <p>As outlined in section 3.13 of Volume 1, Chapter 3: Project description (APP-050), no offshore decommissioning works will take place until a written decommissioning programme has been approved by the Secretary of State for the Department for Energy Security and Net Zero (formerly the Department for BEIS), a draft of which will be submitted prior to the construction of the Mona Offshore Wind Project. The decommissioning programme will be updated during the Mona Offshore Wind</p>

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Reference	Relevant Representation Comment	Applicant's response
		Project lifespan to take account of changing best practice and new technologies. The scope of the decommissioning works would be determined by the relevant legislation and guidance at the time of decommissioning (i.e. including latest guidance on best practice for the decommissioning of cables).
RR-033.79	Section 3.13.2.4, page 80: JNCC would expect all mattresses (concrete and frond) and rock bags used for cable protection to be removed at decommissioning.	As outlined in section 3.13 of Volume 1, Chapter 3: Project description (APP-050), the project position is that cable protection will preferably be left <i>in situ</i> , but removal has been assessed where this represents the maximum design scenario for relevant impacts for benthic receptors (e.g. removal of hard substrates). Conversely, where leaving cable protection <i>in situ</i> represents the maximum design scenario this has been assessed for relevant impacts (e.g. long term habitat loss). The scope of the decommissioning works would be determined by the relevant legislation and guidance at the time of decommissioning (i.e. including latest guidance on best practice for the decommissioning of cable protection).
RR-033.80	Section 3.13.2.5, page 81: We would agree that the cable installation and removal impacts would have the same temporary impact. However, if cables were left in situ and required protection through rock dump (for example through cut ends or free spans), this would increase the permanent impact to the seabed and should be considered further.	The project design assessed in the Environmental Statement does not include for additional cable protection to be installed at the point of decommissioning. The decommissioning programme will be updated during the Mona Offshore Wind Project lifespan to take account of changing best practice and new technologies. The scope of the decommissioning works would be determined by the relevant legislation and guidance at the time of decommissioning (i.e. including latest guidance on best practice for the decommissioning of subsea cables).
RR-033.81	<p><b>Volume 2, Chapter 1: Physical Processes</b></p> <p>Section 1.9.5.10, page 83: We believe that the total Offshore Substation Platforms (OSP) footprint should be 20,180m<sup>2</sup> and not 19,500m<sup>2</sup> as detailed in comments above regarding the tables in Volume 1, Chapter 3. Note, the calculations detailed here are based on our interpretation of the data within the ES, notwithstanding our comments above on the numerous numerical errors throughout the ES.</p>	<p>The Mona Offshore Wind project has adopted a maximum design scenario approach which allows the EIA process to be conducted on the basis of a realistic 'worst case' scenario (i.e. the maximum project design parameters) which is selected from different design and construction scenarios. Therefore, it is not appropriate to multiply the maximum number of OSPs specified in Volume 1, Chapter 3: Project description (APP-050) by the maximum seabed area per foundation, for example.</p> <p>As explained in Table 1.15 of Volume 2, Chapter 1: Physical processes (APP-053), the greatest overall in-water column blockage to influence tidal flow and wave climate from the OSPs is the maximum number of OSPs (four) with gravity base foundations. These parameters also present the largest overall footprints to affect changes in bathymetry and sediment transport pathways. However, the greatest single site influence in terms of OSP structures is the rectangular gravity base structure, which is larger than other foundation options. This was demonstrated in modelling of this single foundation under sensitivity testing</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-033.82	<p><b>Volume 2, Chapter 2: Benthic subtidal and intertidal ecology</b></p> <p>Table 2.8, page 31: We agree that Jack up vessel events on their own would be a temporary habitat loss/disturbance. However, jack up events regularly require extra stabilisation through rock dumping, particularly in softer seabed environments and/or within high dynamic environments. The extra rock dump required for jack up events has not been accounted for and should be considered a permanent impact and be included within the long term habitat loss/habitat alteration impact during construction, operation and maintenance, and also during decommissioning.</p> <p>Foundation removal does not address gravity-based structures for turbines or OSPs. If these are not possible to decommission (see comments above), they should be treated as a permanent habitat change. Introduction of additional rock protection has not been considered. For example, at cable cut ends if not fully removed, at cable free spans, jack up vessel stabilisation (as discussed above), cable crossings and protection, or scour protection.</p>	<p>presented Section 1.4.4 in Volume 6, Annex 1.1: Physical processes technical report (APP-86).</p> <p>The Applicant can confirm that it does not anticipate a requirement for rock dumping to stabilise jack-up operations.</p> <p>At the end of the operational lifetime of the Mona Offshore Wind Project, it is anticipated that all structures above the seabed or ground level will be completely removed where feasible and practical. The maximum design scenario assessed has assumed that cable protection and scour protection may be left <i>in situ</i>. These are the scenarios that have been assessed in the ES. Any deviation from this would be considered and assessed as part of the decommissioning programme at the time of decommissioning taking into account latest guidance and best practice on decommissioning.</p> <p>As outlined in section 3.13 of Volume 1, Chapter 3: Project description (Document Reference APP-050), no offshore decommissioning works will take place until a written decommissioning programme has been approved by the Secretary of State for the Department for Energy Security and Net Zero (formerly the Department for BEIS). The decommissioning programme will be updated during the Mona Offshore Wind Project lifespan to take account of changing best practice and new technologies. The scope of the decommissioning works would be determined by the relevant legislation and guidance at the time of decommissioning. For example, the Applicant has not committed to the removal of cables in the decommissioning phase and the decision on whether to remove offshore cables will be taken at the time of decommissioning in consultation with the relevant stakeholders.</p> <p>The addition of rock protection over cables and around foundations is fully considered and our assumptions are set out in each chapter's section on the maximum design scenario, e.g. see section 1.7.1 and Table 1.15 in Volume 2, Chapter 1: Physical processes (APP-053). The initial assessment deemed that no cable free spans would be undertaken and is secured through the detailed cable specification and installation plan, incorporating a cable burial risk assessment, in adherence to the Applicant's commitments secured under Schedule 14, Condition 18(1)(d) of the Draft DCO (C1 Draft Development Consent Order F03).</p>
RR-033.83	<p>Table 2.18, page 84: We welcome the suggested removal of all scour protection, cable protection, and crossing protection. However, the detail provided within this table contradicts details provided in Volume1, Chapter 3, Section 3.13.2.4, page 80 (see previous comment). Furthermore, if</p>	<p>As outlined in section 3.13 of Volume 1, Chapter 3: Project description (APP-050), the project position is that cable protection and scour protection will preferably be left <i>in situ</i>, but removal has been assessed where this represents the maximum design scenario for relevant impacts for benthic receptors (e.g. removal of hard substrates). Conversely, where leaving cable and scour protection <i>in situ</i></p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>rock dump were to be used for protection, it is highly unlikely that the rock will be able to be removed and would therefore remain a permanent impact.</p>	<p>represents the maximum design scenario this has been assessed for relevant impacts (e.g. long term habitat loss). The scope of the decommissioning works would be determined by the relevant legislation and guidance at the time of decommissioning (i.e. including latest guidance on best practice for the decommissioning of cable protection).</p>
RR-033.84	<p>Table 2.18, page 85: Changes in physical processes will occur at all three phases, not just the operation and maintenance phase. Decommissioning will affect physical processes, although at a much smaller scale, with the addition of rock dump and infrastructure that will be permanently left in situ.</p>	<p>As explained in section 1.9.4. of Volume 2, Chapter 1: Physical processes (APP-053), during the construction phase there will be gradual changes to physical processes as infrastructure is introduced into the environment. This would result in changes and therefore potential impacts ranging from the baseline environment (no presence of infrastructure) to the operational phase maximum design scenario, which are therefore fully assessed in the operation and maintenance phase assessment in section 2.9.9 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054). Changes to physical processes during the decommissioning phase is fully assessed in paragraph 2.9.9.60 <i>et seq.</i> of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054).</p>
RR-033.85	<p>Section 2.9.2.27, page 103: We would not agree with a reduction in the sensitivity of the seapens and burrowing megafauna communities from 'High' to 'Medium'. We acknowledge that seapens have not been recorded within the site-specific surveys to date but seapens do not have to be present to define this OSPAR T&amp;D habitat, as also acknowledged within this section. For this reasoning, it would not be appropriate to reduce the sensitivity to 'Medium' and it should remain as 'High'. This would also apply to all subsequent sections (e.g. Section 2.9.2.32).</p>	<p>As outlined in section 1.7.6 of Volume 6, Annex 2 1: Benthic subtidal and intertidal ecology technical report (APP-087) and in the response to RR-033.71 above, the site-specific benthic surveys identified very few burrows at stations where soft sediment was dominant. In combination with an absence of seapens and the predominantly gravelly sediment, it was concluded that these areas only had a negligible resemblance to the 'seapens and burrowing megafauna communities' habitat. Therefore a precautionary approach was adopted for stations where burrows were observed at an average SACFOR of 'frequent', and these stations were, for the purposes of the assessment, assumed to represent the 'seapens and burrowing megafauna communities' habitat.</p> <p>The sensitivity allocated to the seapens and burrowing megafauna communities IEF was based on the high sensitivity allocated in the MarESA to the relevant impacts. This sensitivity rating is primarily driven by the fragile nature of seapens as an epifaunal species. As previously noted site specific surveys identified no seapens within the Mona Offshore Wind Project therefore the sensitivity associated with this habitat was reduced to medium.</p> <p>Therefore, the Applicant considers that the assessment of the 'seapens and burrowing megafauna communities' habitat is sufficiently precautionary in this regard. Furthermore, to have adopted the full MarESA sensitivities, without amending for the particular sensitivity of seapens, would have over-estimated the impact to the specific habitat present in the Mona Offshore Wind Project. The Applicant is confident that the impacts to the seapens and burrowing megafauna</p>

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Reference	Relevant Representation Comment	Applicant's response
		communities Important Ecological Features will be no greater than minor adverse significance and are therefore not significant in EIA terms.
RR-033.86	Section 2.9.2.51, page 110: We agree that the seabed will recover after the removal of the jack-up vessel's spud cans but only when no rock dump has been used for stabilisation or scour protection of the spud cans (see comment on Table 2.8 above).	The Applicant can confirm that it does not anticipate requirements for rock dumping to stabilise jack-up operations.
RR-033.87	Section 2.9.5.10, page 146: JNCC do not agree with a low magnitude of impact, considering over two million square meters (Section 2.9.5.7) of seabed will be permanently impacted/changed. Section 2.9.5.7 highlights the impact area and gives a percentage of that compared with the Mona benthic subtidal and intertidal ecology study area (0.17%). This is not helpful as those areas include large portions that will not be directly impacted by the operations. A more useful area comparison for calculating the impact percentage would be of the total direct and indirect (temporary) impact areas. Combining the Long-term habitat loss and Temporary habitat loss areas would provide a more meaningful impact percentage and subsequent meaningful magnitude.	<p>The assessments of magnitude have been based on the total areas of habitat disturbance/loss (in m<sup>2</sup>/km<sup>2</sup>) and the Applicant considers that presenting the percentages of the study area affected is useful in providing wider context to the values of long term habitat loss. Furthermore, the Applicant does not consider it appropriate to sum the values predicted for long term habitat loss and temporary habitat disturbance as the nature of the impacts (e.g. duration and recovery) are very different.</p> <p>The maximum design scenario for long term habitat loss is considered to be consistent with the definition of a low magnitude of impact (i.e. some measurable change in attributes, quality or vulnerability, minor loss or, or alteration to, one (maybe more) key characteristics, features or elements (Adverse)).</p>
RR-033.88	Section 2.9.5.22, page 150: JNCC do not agree with the suggestion that the permanent presence of cable and scour protection should be considered as permanent habitat alteration rather than permanent habitat loss. The permanent introduction of hard substrates into a soft sediment environment would be a permanent habitat loss that leads to a regime shift of that habitat (i.e. a permanent habitat alteration). It should therefore be considered as permanent habitat loss. This should be taken into account when re-assessing the magnitude of impact (Section 2.9.5.23, page 151).	The assessment of the potential for cable and scour protection to remain <i>in situ</i> post-decommissioning has been assessed as permanent long term habitat loss/habitat alteration (paragraphs 2.9.5.22 to 2.9.5.32 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054)), so considers both the loss of the sedimentary environment and the localised change/alteration to a hard substrate. The assessment concludes the effect will be of minor adverse significance.
RR-033.89	Section 2.9.6.6, page 153: JNCC recognise that settlement and subsequent recruitment on clean artificial structures is very complex. It should not be expected that colonisation will consist entirely of already present flora and fauna.	The assessment of the effects associated with the introduction of artificial structures, presented in section 2.9.6 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), has drawn upon the latest published studies and research papers. The assessment considers the complexities of this impact,

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Reference	Relevant Representation Comment	Applicant's response
	<p>Opportunistic colonisation will occur from flora and fauna that would not normally be recorded in the area due to the clean artificial surfaces allowing for opportunistic settlement. This has the potential to alter subsequent settlement and recruitment that can lead to a different final community composition. Additionally, temporal variation will also determine the final community composition (e.g. studies have shown different community composition depending on the time of year when the artificial structure was introduced). Please contact JNCC with any questions regarding the above comments.</p>	<p>addressing both the potential impacts of the introduction of infrastructure on biodiversity and also the potential for adverse effects on the wider soft sediment environment. The Applicant is confident that the effects associated with this impact pathway will be no greater than minor adverse significance and are therefore not significant in EIA terms.</p>

## 2.34 Linda Griffiths

Table 2.34: RR-034 – Linda Griffiths

Reference	Relevant Representation Comment	Applicant's response
RR-034.1	To date I have not had opportunity to study the many volumes of documents associated with the Mona project. However I am personally mentioned (name and address) on pages 347 and 469 of the 649 page document D4/FO2 The Book of Reference April 2024. I therefore wish to register as an Interested Party Linda Griffiths	The applicant notes the representation and will continue to engage with Linda Griffiths regarding her interest as identified within the Book of Reference (AS-015).



## 2.35 Llanddulas and Rhyd Y Foel Community Council

Table 2.35: RR-035 – Llanddulas and Rhyd Y Community Council

Reference	Relevant Representation Comment	Applicant's response
RR-035.1	Potential impact on local community	<p>The Applicant recognises Llanddulas and Rhyd Y Foel Community Council's position as the host ward for the project's landfall and is committed to ongoing engagement throughout the examination, determination and post-determination phases. Potential impacts on relevant receptors that are found within the Llanddulas and Rhyd Y Foel area have been assessed within the relevant chapters of Environmental Statement:</p> <ul style="list-style-type: none"> <li>• Volume 2, Chapter 8: Seascape and visual resources (APP-060)</li> <li>• Volume 3, Chapter 1: Geology, hydrology and ground conditions (APP-064)</li> <li>• Volume 3, Chapter 2: Hydrology and flood risk (APP-065)</li> <li>• Volume 3, Chapter 3: Onshore ecology (APP-066)</li> <li>• Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-067)</li> <li>• Volume 3, Chapter 5: Historic environment (APP-068)</li> <li>• Volume 3, Chapter 6: Landscape and visual resources (APP-069)</li> <li>• Volume 3, Chapter 7: Land use and recreation (APP-070)</li> <li>• Volume 3, Chapter 8: Traffic and transport (APP-071)</li> <li>• Volume 3, Chapter 9: Noise and vibration (APP-072)</li> <li>• Volume 3, Chapter 10: Air quality (APP-073)</li> <li>• Volume 4, Chapter 3: Socio-economics (APP-077)</li> <li>• Volume 4, Chapter 4: Human health assessment (APP-078)</li> <li>• Other relevant documents include the Outline Skills and Employment Plan (APP-210), Outline Code of Construction Practice (APP-212) and the Community and Linguistic Impact Assessment (APP-045).</li> </ul> <p>Llanddulas and Rhyd Y Foel Community Council was formally consulted as part of the Applicant's statutory consultation. Further, Llanddulas was included within the consultation zone, which meant that mapped residents and businesses received a bilingual postcard detailing the project, ways to have their say and the location and times of exhibitions. An exhibition was held in the Llanddulas Village Hall on 4 May 2023, to allow the local residents to find out more about the project. Full details of</p>

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Reference	Relevant Representation Comment	Applicant's response
		the Applicant's consultation with communities in Llanddulas and Rhyd Y Foel are set out in the Consultation Report (APP-037).

## 2.36 Lloyd Roberts

Table 2.36: RR-036 – Lloyd Roberts

Reference	Relevant Representation Comment	Applicant's response
RR-036.1	I am registering my interest in the project as I am a land owner that the proposed route is taking.	The Applicant is aware of the interest and will continue to engage with Lloyd Roberts and his appointed agent regarding the land rights being sought throughout the examination.

## 2.37 Llywodraeth Cymru / Welsh Government

Table 2.37: RR-037 – Llywodraeth Cymru / Welsh Government

Reference	Relevant Representation Comment	Applicant's response
RR-037.1	Welsh Government representation will be made to support its policies.	The Applicant notes your response. The planning policy context that was identified and considered for the Mona Offshore Wind Project DCO application is provided in Volume 1, Chapter 2: Policy and Legislative Context (APP-049). The planning policies considered in the DCO application and compliance with those policies are described in the Planning Statement (APP-186).

## 2.38 Margaret Hussey

Table 2.38: RR-038 – Margaret Hussey

Reference	Relevant Representation Comment	Applicant's response
RR-038.1	<p>Outline of Principal Submissions relating to application reference number EN10137 I intend to raise via written representations and if appropriate oral representations concerns about this scheme in relation to the following points:- Site Selection • Suitability • Scale • Environmental and Community Impacts • Change in Character Personal Impact • Visual • Noise • Quality of Life • Nuisance • Health and Wellbeing • Change in Behaviour • Privacy • Vibration • EMF's • Open Space • Leisure and Play • Light Pollution Cumulative Impacts • National Grid and Awel y M?r • Mares Interconnector Traffic • HGV impacts Ffordd William Morgan and Glascoed Road • Cumulative impacts I also wish to extend and would very much welcome a visit by the inspectors to my property as part of the examination process.</p>	<p>The Applicant has been engaging with Mrs Hussey regularly since September 2022. This has included direct contact by telephone, post, email, by attending in-person meetings at her home and discussing Project matters with her when she attended consultation events.</p> <p>While a number of the areas raised within this relevant representation response have already been the subject of previous discussions, the Applicant fully recognises the need to continue these discussions throughout the Examination phase.</p> <p>The Applicant is committed to continuing this engagement and will continue to answer any questions as open and transparently as they can to provide information and materials to support her understanding of the application as it progresses.</p> <p>All the topics raised within Mrs Hussey's relevant representation have been addressed throughout the application documents including for example relevant sections of the Environmental Statement:</p> <ul style="list-style-type: none"> <li>• Volume 1, Chapter 4: Site selection and assessment of alternatives (AS-106)</li> <li>• Volume 3, Chapter 1: Geology, hydrology and ground conditions (APP-064)</li> <li>• Volume 3, Chapter 2: Hydrology and flood risk (APP-065)</li> <li>• Volume 3, Chapter 3: Onshore ecology (APP-066)</li> <li>• Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-067)</li> <li>• Volume 3, Chapter 5: Historic environment (APP-068)</li> <li>• Volume 3, Chapter 6: Landscape and visual resources (APP-069)</li> <li>• Volume 3, Chapter 7: Land use and recreation (APP-070)</li> <li>• Volume 3, Chapter 8: Traffic and transport (APP-071)</li> <li>• Volume 3, Chapter 9: Noise and vibration (APP-072)</li> <li>• Volume 3, Chapter 10: Air quality (APP-073)</li> <li>• Volume 4, Chapter 2: Climate change (APP-076)</li> </ul>

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Reference	Relevant Representation Comment	Applicant's response
		<ul style="list-style-type: none"> <li>• Volume 4, Chapter 3: Socio-economics (APP-077)</li> <li>• Volume 4, Chapter 4: Human health assessment (APP-078).</li> </ul> <p>Other relevant documents include the Planning Statement (APP-186), the Consultation Report (APP-037 to APP-040), Outline Skills and Employment Plan (APP-210), Outline Code of Construction Practice (APP-212) and the Community and Linguistic Impact Assessment (APP-045).</p>

## 2.39 Maritime and Coastguard Agency

**Table 2.39: RR-039 – Maritime and Coastguard Agency**

Reference	Relevant Representation Comment	Applicant's response
RR-039.1	MCA will be responding to the ExA on matters concerning the safety of maritime navigation and maritime Search and Rescue. MCA will provide comments on the Navigation Risk Assessment, Shipping & Navigation chapter of the EIA Report, and the content of the DCO and DML.	The Applicant notes the response.
RR-039.2	The main issues for MCA are concerning vessel routeing, vessels' ability for continued safe passage, that risks to all vessels and craft are at an acceptable level, and the project is not at the detriment to the provision of Search and Rescue, and other emergency response.	<p>The Applicant has engaged with MCA throughout the pre-application period, primarily through the Marine Navigation Engagement Forum (MNEF). The MNEF was created early in the pre-application phase as a forum to discuss shipping and navigation matters with stakeholders and met six times between 2021 and 2024 (see section 1.4.2. in the Technical Engagement Plan (APP-041) for further information).</p> <p>Further, the Applicant has taken into consideration comments from the MCA in its draft DCO (C1 Draft Development Consent Order F03).</p> <p>The Applicant will continue to engage with MCA through the Examination period.</p>

## 2.40 Martyn Hussey

Table 2.40: RR-040 – Martyn Hussey

Reference	Relevant Representation Comment	Applicant's response
RR-040.1	<p>Outline of Principal Submissions relating to application reference number EN10137 I intend to raise via written representations and if appropriate oral representations concerns about this scheme in relation to the following points:- Site Selection • Suitability • Scale • Environmental and Community Impacts • Change in Character Personal Impact • Visual • Noise • Quality of Life • Nuisance • Health and Wellbeing • Change in Behaviour • Privacy • Vibration • EMF's • Open Space • Leisure and Play • Light Pollution Cumulative Impacts • National Grid and Awel y Mŵr • Mares Interconnector • Lightsource BP Traffic • HGV impacts Ffordd William Morgan and Glascoed Road • Cumulative impacts National Policies Whilst indicating that reference to National Policies should not be made, I feel this is discriminatory given that the applicant refers on numerous occasions to National Policy statements throughout their supporting documentation. I therefore would also like to make reference to the following policies. ? National Policy Statement for Energy ? National Policy Statement for Renewable Energy Infrastructures EN-3 ? Offshore Transmission Network Review and its 3 Work Streams ? HND Pathway to 2030 ? Welsh Rural Economic Policy ? Planning Policy Wales Finally, I wish to extend and would very much welcome a visit by the inspectors to my property as part of the examination process.</p>	<p>The Applicant has been engaging with Mr Hussey regularly since September 2022. This has included direct contact by telephone, post, email, by attending in-person meetings at his home and discussing Project matters with him when he attended consultation events.</p> <p>While a number of the areas raised within this relevant representation response have already been the subject of previous discussions, the Applicant fully recognises the need to continue these discussions throughout the Examination phase.</p> <p>The Applicant is committed to continuing this engagement and will continue to answer any questions and to provide information and materials to support Mr. Hussey's understanding of the application as it progresses.</p> <p>All the topics raised within Mr Hussey's relevant representation have been addressed throughout the application documents including for example relevant sections of the Environmental Statement:</p> <ul style="list-style-type: none"> <li>• Volume 1, Chapter 2: Policy and legislative context (APP-049)</li> <li>• Volume 1, Chapter 4: Site selection and assessment of alternatives (AS-106)</li> <li>• Volume 3, Chapter 1: Geology, hydrology and ground conditions (APP-064)</li> <li>• Volume 3, Chapter 2: Hydrology and flood risk (APP-065)</li> <li>• Volume 3, Chapter 3: Onshore ecology (APP-066)</li> <li>• Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-067)</li> <li>• Volume 3, Chapter 5: Historic environment (APP-068)</li> <li>• Volume 3, Chapter 6: Landscape and visual resources (APP-069)</li> <li>• Volume 3, Chapter 7: Land use and recreation (APP-070)</li> <li>• Volume 3, Chapter 8: Traffic and transport (APP-071)</li> <li>• Volume 3, Chapter 9: Noise and vibration (APP-072)</li> <li>• Volume 3, Chapter 10: Air quality (APP-073)</li> <li>• Volume 4, Chapter 2: Climate change (APP-076)</li> </ul>



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Reference	Relevant Representation Comment	Applicant's response
		<ul style="list-style-type: none"> <li>• Volume 4, Chapter 3: Socio-economics (APP-077)</li> <li>• Volume 4, Chapter 4: Human health assessment (APP-078).</li> </ul> <p>Other relevant documents include the Planning Statement (APP-186), the Consultation Report (APP-037 to APP-040), Outline Skills and Employment Plan (APP-210), Outline Code of Construction Practice (APP-212) and the Community and Linguistic Impact Assessment (APP-045).</p>

## 2.41 McMahon Design and Management Ltd

Table 2.41: RR-041 – McMahon Design and Management Ltd

Reference	Relevant Representation Comment	Applicant's response
RR-041.1	Views on the interaction of the proposed development with existing, planned and future submarine fibre optic cable infrastructure - from co-location, crossings, proximity, operation and maintenance and repair of infrastructure in the future.	The Applicant notes your response. The Applicant has been engaging with McMahon Design and Management Limited in their role as representatives of the EU Networks 'Rockabil' telecommunications cable (see RR-020) which is an existing telecommunications cable that traverses the Mona Offshore Wind Project.

## 2.42 Menna Jones

Table 2.42: RR-042 – Menna Jones

Reference	Relevant Representation Comment	Applicant's response
RR-042.1	I sail this area regularly and will be commenting on how this will effect my enjoyment of my sport.	The Applicant notes your response. The potential impact on recreational sailing is presented in Volume 2, Chapter 10: Other sea users (APP-062).

## 2.43 Michael and Sally Leach

Table 2.43: RR-043 – Michael and Sally Leach

Reference	Relevant Representation Comment	Applicant's response
RR-043.1	<p>The Mona project has not adequately considered and mitigated the potential affects to Nant Ganol and other properties in close proximity to the construction areas in and around Y Nentydd. There is limited design information or lack of detail in Code of Construction Practice, PEIR, draft DCO and Work Plans.</p>	<p>The Applicant is aware of the interest and notes the representation, and the Applicant will continue to engage with Michael and Sally Leach and their agent through examination. A meeting took place between Michael and Sally Leach's agent and the Applicant's land agent on the 13th June 2024 to better understand the concerns set out. The documents listed in the representation which have been submitted by the Applicant include the detail required as set out in the Planning Act 2008.</p>
RR-043.2	<p>Inadequate information provided for accurate assessment on the significance impacts to the Property from:</p> <ul style="list-style-type: none"> <li>o Construction traffic, vehicle movements and haul road construction</li> <li>o Noise</li> <li>o Vibration</li> <li>o Lighting</li> <li>o Dust/Fumes</li> <li>o Soil Storage and Management</li> <li>o Environmental impacts and mitigation areas</li> <li>o Footpath and PROW diversions</li> <li>o Decommissioning</li> <li>o HDD locations and working requirements</li> <li>o Construction compounds and storage locations</li> <li>o Temporary and Permanent Works access routes</li> <li>o Construction Programme</li> </ul> <p>Further detailed proposals necessary in order to consider impacts and mitigation options ahead of DCO examination process.</p>	<p>The Applicant will continue to engage with Michael and Sally Leach and their agent to understand what further information is being requested on those items set out in the representation.</p> <p>Potential impacts associated with widespread disruption to traffic flows and the public highway generally are considered within Volume 3, Chapter 8: Traffic and Transport (APP-071). The Applicant has also prepared an Outline Construction Traffic Management Plan (APP-225) which includes detail on access routes.</p> <p>Measures to mitigate the potential impacts of dust, noise and vibration as a result of the construction of the Mona Offshore Wind Project are set out the Outline Dust Management Plan (APP-214) and the Outline Construction Noise and Vibration Management Plan (APP-215), which form part of the Code of Construction Practice (CoCP). The mitigation measures will be monitored by the Applicant throughout the construction phase. The CoCP is secured by Requirement 9 of the draft DCO (AS-010 to be superseded by C1 Draft Development Consent Order F03). Final versions of the Dust Management Plan and the Construction Noise and Vibration Management Plan will be implemented as approved by the relevant local planning authority.</p> <p>Soil Storage and Management will be undertaken in accordance with the final Soil Management Plan. The Plan will be based on the principles set out in the Outline Soil Management Plan (APP-220). The Plan forms part of the CoCP, which is secured as a Requirement of the draft DCO (C1 Draft Development Consent Order F03).</p> <p>The Applicant is committed to developing the Mona Offshore Wind Project in a way that is sensitive to the environment, minimising effects wherever possible.</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>Impacts have been carefully assessed and appropriate mitigation identified is secured through the draft DCO (C1 Draft Development Consent Order F03). A detailed analysis of alternatives examined is provided at Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4) – this demonstrates the process the Applicant followed in identifying suitable sites for the onshore elements of the Mona project with regard to environmental and other constraints.</p> <p>Detail on the management or diversion of the Footpaths and Public Rights of Way can be found in the Outline Public Rights of Way Management Strategy (APP-299) which sets out measures to be implemented during the construction phase.</p> <p>The Applicant has included detail on decommissioning, HDD locations, decommissioning and programme detail within the Volume 1, Chapter 3: Project Description submitted as part of the Application for the Mona Offshore Wind Project.</p>
RR-043.3	Despite the baseline noise assessment location at LT10 limited assessment has been carried out in the adjacent area despite several properties clearly lying within high impact noise zones for evening and weekend working.	<p>The baseline sound survey (ES Volume 7, Annex 9.1: Baseline Sound Survey (APP-178)) was undertaken 12 locations along the Mona Onshore Cable Corridor at locations representative of receptors situated in the vicinity of the proposed construction works. The locations of the sound survey were discussed and agreed with the relevant planning authorities.</p> <p>The results from the baseline sound survey have been used to undertake a construction noise and vibration assessment (ES Volume 7, Annex 9.2: Construction Noise and Vibration Technical Report (APP-179) to identify the potential for noise impacts to occur during construction activities and construction traffic associated to the Mona Offshore Wind Project. The study area for the assessment includes noise sensitive receptors located within 300 m of the Mona Onshore Development Area; 1km of the Landfall and Mona Onshore Substation; and 50 km of the Mona Array Area. The potential noise impacts are assessed in ES Volume 3, Chapter 9: Noise and Vibration (APP-072) and no significant adverse effects are predicted from the construction of the Mona Onshore Cable Corridor or from construction traffic on the local highway network.</p>

## 2.44 Michael Rowlings

Table 2.44: RR-044 – Michael Rowlings

Reference	Relevant Representation Comment	Applicant's response
RR-044.1	<p>Commercial fisherman wanting to know what where and when parts in the local fishing grounds will be affected if any compensation is being allowed in case of lack of fishing whilst farm being made and is there any proof no damages will occur to the commercial cockle and mussel beds what are in the Morecambe bay through to the Liverpool bay</p>	<p>No impacts assessed within Volume 2, Chapter 6: Commercial fisheries (APP-058) were judged to be significant in EIA terms. No compensation is proposed for commercial interest in cockle or mussel beds. Table 3.37 of Volume 1, Chapter 3: Project description (APP-050) provides an indicative construction programme for the Mona Offshore Wind Project. Notice to Mariners and other forms of information and the use of a Fisheries Liaison Officer (FLO) and Offshore FLO will insure that commercial fisheries stakeholders and other mariners are aware of 'what, where and when' activity is occurring through the construction phase. Through the use of safety zones and rolling advisory exclusion zones, the Applicant has committed to not closing the entire development to fisheries stakeholders and other sea users.</p> <p>Enabling co-existence and indeed, co-location was a key aim underpinning the Applicant's commitments to not close the entire development area during construction, the scallop mitigation zone (SMZ) and the orientation and spacing of infrastructure. Fishing receptor groups will be able to continue fishing within parts of the Mona Array Area and Mona Offshore Cable Corridor during construction. During the operations and maintenance phase, the measures adopted as part of the Mona Offshore Wind Project such as the SMZ, minimum infrastructure spacing of 1,400 m and roughly north-to-south alignment of wind turbine rows (as set out in the Outline fisheries liaison and co-existence plan (APP-199)), will provide the space for continued fishing within the Mona Array Area and across the Mona Offshore Cable Corridor, and fishing vessels will be able to transit through these areas.</p>

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**2.45 Moir Vannin Offshore Wind Farm Limited**

**Table 2.45: RR-045 – Moir Vannin Offshore Wind Farm Limited**

Reference	Relevant Representation Comment	Applicant's response
RR-045.1	Moor Vannin Offshore Wind Farm Limited is the developer of the proposed Moor Vannin Offshore Wind Farm, which holds a grid connection offer and an Agreement for Lease (AfL) with the Isle of Man Government ("our Project").	The Applicant notes the response.
RR-045.2	We submitted a Scoping Report in 2023 and are preparing to submit an Application for Marine Infrastructure Consent in 2025. Our proximity to Mona Offshore Wind Farm ("MOWF") can be seen in MOWF's Environmental Statement ("ES") (F2.10) Figure 10.4 and Table 10.10.	The Applicant is aware of the publication of the Moor Vannin Offshore Wind Farm Scoping Report on 18 <sup>th</sup> October 2023, which resulted in the Applicant amending the status of the Moor Vannin Offshore Wind Project from 'Tier 3' to 'Tier 2' in relevant cumulative effects assessments, as set out for example under section 10.10 and Table 10.18 of Volume 2, Chapter 10: Other sea users (APP-062).  The Applicant notes that Moor Vannin Offshore Wind Farm is a minimum of 34.5 km from Mona Offshore Wind Project as stated in Table 10.10 of APP-062.
RR-045.3	We do not object to the principle of MOWF. We do, however, wish to participate in the DCO Examination to make representations about the potential impacts on and interactions with our Project and, where appropriate, to secure appropriate mitigations	The Applicant notes the response.
RR-045.4	High-level concerns were previously highlighted to MOWF via a consultation response. Our concerns as raised in the response remain extant and we expect further meaningful engagement to seek to address the issues raised below and previously. We are open to addressing within or outside the Examination process and have met with representatives of MOWF and Morgan Offshore Wind Farm in 2024 to discuss potential mitigations (radar and shipping and navigation) and opportunities (Landfall and Grid connection and Net Gain) for alignment. MOWF should take into account all of our Project's information and engage appropriately with us as both projects' applications progress.	Engagement has occurred with Moor Vannin Offshore Wind Farm Limited during the application phase of the Mona Offshore Wind Farm project as detailed in the Consultation report (APP-037) and will continue as required throughout the Examination phase.
RR-045.5	MOWF must ensure the accuracy of cumulative and in-combination assessments to ensure impacts are properly understood and appropriately mitigated to facilitate effective	The specific Figures and Tables referenced in Volume 2, Chapter 7: Shipping and navigation (APP-059) relate to the revised passage plans (which include detailed descriptions of a vessel's voyage from start to finish, including the route and

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Reference	Relevant Representation Comment	Applicant's response
	<p>co-existence. We note previous consultation responses to MOWF, including from the Isle of Man Government Territorial Sea Committee (E3.1), which refer to our AfL area being omitted from certain maps of neighbouring offshore windfarms. We note that certain Figures and Table within the ES (F2.7) are stated as “excluding Mooir Vannin Offshore Wind Farm”. Our Project’s concerns include:</p>	<p>hazards likely to be encountered along the way). These do not consider the presence of Mooir Vannin Offshore Wind Farm as the Mooir Vannin Scoping report had not been published at the time these were developed. However, following publication of the Mooir Vannin Offshore Wind Farm scoping Report on 18 October 2023, the Mooir Vannin Offshore Wind Farm has been considered within an addendum (appendix D) to the Cumulative Regional Navigational Risk Assessment (CRNRA) (APP-098) and within the Cumulative Effects Assessments in Volume 2, Chapter 7: Shipping and navigation (APP-059), where appropriate.</p>
<p>RR-045.6</p>	<p>Issue one: The ES highlights potential significant impacts on wildlife, including potential significant project-alone and in-combination impacts on marine mammals (F2.4). We further note in relation to offshore ornithology that Tables 5.49 – 5.50 of the Cumulative Effects Assessment (CEA) refer to our Project but no further consideration is made. A further example is Commercial Fisheries where the MMO specifically requested that our Project is considered within the CEA. We note that our Project is discussed in relation to effects on scallop vessels and offshore static gear vessels during the construction phase and O&amp;M phase. In relation to both receptors the effects are judged to be non-significant. We are not convinced that the baseline and the predicted impacts are robust and align with our understanding of the local environment and we require to analyse this further. The impact of our Project must be accounted for by MOWF and appropriate mechanisms must be put in place to facilitate co-existence and allow co-ordination to reduce potential cumulative or in-combination impacts.</p>	<p>The Mona Offshore Wind Project has undertaken an assessment of all potential impacts on marine wildlife informed by appropriate data sources from site specific surveys and detailed desktop studies, in accordance with relevant topic specific guidance. The assessment of potential impact to marine wildlife is presented in four chapters: Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), Volume 2, Chapter 4: Marine mammals (APP-056) and Volume 2, Chapter 5: Offshore ornithology (APP-057).</p> <p>The Mooir Vannin Offshore Windfarm has been included as a tier 2 project within the cumulative effects assessments for offshore topics (Volume 2, Chapters 1 to 10 (APP-053 to APP-062)). Mooir Vannin has been categorised as tier 2 on the basis that scoping report had been published at the time of the assessment, and the assessments have considered all reasonably foreseeable interactions based on available project information. Detailed assessment could not be provided in all cases; for example, Mooir Vannin bird abundance data would be required to enable quantitative cumulative modelling for offshore ornithology (Volume 2, Chapter 5: Offshore ornithology (APP-057)).</p> <p>The evidence to inform the baseline and the approach to predicting impacts on marine mammals were discussed and agreed through an Evidence Plan Process which included an Expert Working Group (EWG) for marine mammals as set out in section 4.5 of the Consultation Report (APP-037). To inform the Environmental Statement, site-specific surveys were undertaken, as agreed with the marine mammal EWG, across the Mona Array Area plus a buffer extending between 7 to 16.5 km. Further, and on advice from the marine mammals EWG, additional data sources and informative documents were identified post-scoping that were used to inform the baseline characterisation. All suggested data sources have been included in the baseline (Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement (APP-090)). The Applicant is therefore confident that the assessment of likely significant effects on marine mammals presented in Volume 2, Chapter 4: Marine mammals (APP-056) is based on the</p>



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Reference	Relevant Representation Comment	Applicant's response
		<p>most scientifically robust evidence available, and that sufficient precaution is built into the assessment.</p> <p>The Underwater sound management strategy (with an Outline underwater sound management strategy submitted as part of the application (APP-202)) will reduce the Mona Offshore Wind Project's contributions to the cumulative assessment, if required, post consent. Requirements for management measures and mitigation will be discussed in consultation with the licensing authority and statutory nature conservation bodies (SNCBs).</p> <p>Similarly, site-specific surveys were undertaken, as agreed with the statutory bodies, to inform the Environmental Statement for offshore ornithology. Digital Aerial Surveys (DAS) were undertaken across the Mona Array Area plus a buffer extending between 7 to 16.5 km to characterise the distribution and abundance of seabirds.</p> <p>With respect to commercial fisheries, consultation with key local and regional fisheries stakeholders (which started in June 2021 and included representatives from the Isle of Man Government fisheries team and the Manx Fish Producers Organisation (MFPO)) continued over the pre-application phase of the Mona Offshore Wind Project to ensure that relevant information from fisheries stakeholders was used to inform the baseline.</p> <p>As outlined in Volume 2, Chapter 10: Other sea users (APP-062), the Mona Offshore Wind Project has committed to engagement with other offshore wind energy operators and developers to minimise disruption to either party's operations and activities and to maximise coexistence.</p>
RR-045.7	<p>Issue two: The ES highlights extensive impacts on shipping and navigation and commits to stakeholder engagement (F2.7 7.14.1.2-7.14.1.4). We require to be involved in such engagement to ensure that co-existence can be successfully achieved. The cumulative effect of MOWF, the proposed Morgan offshore windfarm and Morecambe offshore windfarm and our Project is set out in the Navigational Risk Assessment which refers to the fact that "with the addition of Mooir Vannin OWF, there were likely to be further impacts on ferry routes in typical and adverse conditions and unacceptable risk to navigation safety" (F6.7.1 D.5.1.1.8).</p>	<p>The Applicant notes that Mooir Vannin Offshore Wind Farm is located more than 18 nm to the north of the Mona Array Area. Mooir Vannin Offshore Wind Farm have been consulted as part of the Marine Navigation Engagement Forum (MNEF) and attended the hazard workshop as set out in Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098).</p> <p>Significant cumulative effects relating to Mona Offshore Wind Project were not identified within the Navigational Risk Assessment (APP-098). As identified within paragraphs 7.11.3.48-49 of Volume 2, Chapter 7: Shipping and navigation (APP-059), the Applicant's CEA concluded that cumulatively within the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm (without Mooir Vannin Offshore Wind Farm), all impacts on navigational safety have been reduced to As Low As Reasonably Practicable but that there are some residual significant effects on ferry routes. Therefore, it is anticipated that additional engagement committed to within APP-059 (see paragraphs 7.14.1.2-7.14.1.4) is to discuss the approach to</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>resolving those residual impacts on ferry companies. As stated in paragraph 7.10.1.16 of Volume 2, Chapter 7: Shipping and navigation (APP-059) and described in the Moir Vannin Offshore Wind Farm Scoping Report, it is expected that a CEA (which will include shipping and navigation) will be prepared by Moir Vannin Offshore Wind Farm Limited on the basis of their proposed development parameters which will accompany their development application to the Isle of Man Government.</p> <p>The Applicant has committed within Volume 2, Chapter 7: Shipping and navigation (APP-059) to continue engagement with all stakeholders through the Marine Navigation Engagement Forum (MNEF) which includes offshore wind energy developers.</p>
RR-045.8	<p>Issue Three: It is anticipated that there may be a requirement to put in place appropriate mitigation in relation to potential impacts on primary surveillance radar. We require assurance that MOWF has correctly assessed the impact of its windfarm both project alone and on an in-combination basis.</p>	<p>An assessment of the potential impact of wind turbines causing interference to civil primary surveillance radar (PSR) systems for the Mona Offshore Wind Project alone and cumulatively with other plans, projects and activities is presented in Volume 4, Chapter 1: Aviation and radar (APP-075). Consideration of mitigation has been included in section 1.9.3.9 of Volume 4, Chapter 1: Aviation and radar (APP-075). This assessment has been undertaken in line with the relevant guidance and Civil Aviation Authority (CAA) Standards listed in section 1.4.1 of Volume 4, Chapter 1: Aviation and radar (APP-075).</p>

## 2.46 Morecambe Offshore Windfarm Limited

Table 2.46: RR-046 – Morecambe Offshore Windfarm Limited

Reference	Relevant Representation Comment	Applicant's response
RR-046.1	<p>Mona is one of the three Round 4 Irish Sea offshore wind farms planned in the vicinity of the Morecambe Generation project. The Environmental Statement for the Morecambe Generation DCO application (due to be submitted in May 2024) has identified a number of potential cumulative impacts in combination with Mona, broadly covering ornithology, marine mammals, shipping and navigation, aviation and commercial fisheries. It may also be appropriate to have co-operation or co-existence agreement(s) between the projects. The Morecambe Generation project is supportive in principle of the Mona DCO application and would like to register an interest, based on the possible need to provide more information to inform and support the Mona OWF examination.</p>	<p>The Applicant notes the potential for cumulative impacts in combination with Morecambe Offshore Windfarm Generation Assets broadly covering ornithology, marine mammals, shipping and navigation, aviation and commercial fisheries and will engage with Morecambe Offshore Windfarm Generation Assets through the Examination phase, including to establish whether a co-operation or co-existence agreement(s) is required.</p>

## 2.47 Morecambe Wind Limited

Table 2.47: RR-047 – Morecambe Wind Limited

Reference	Relevant Representation Comment	Applicant's response
RR-047.1	Morecambe Wind Limited is part owner of the West of Duddon Sands Windfarm a joint Scottish Power Renewables and Orsted venture. West of Duddon Sands is an operational offshore windfarm with a s36 Electricity Act 1989 consent and relevant marine licences ("our Development"). Its proximity to Mona Offshore Wind Farm ("MOWF") can be seen in MOWF's Environmental Statement (the "ES") (F2.10 Figure 10.4 and Table 10.10).	The Applicant notes your response. West of Duddon Sands Windfarm is a minimum of 31.9 km from Mona Offshore Wind Project as stated in Table 10.10 of Volume 2, Chapter 10: Other sea users (APP-062).
RR-047.2	Our Development does not object to the principle of MOWF. We do, however, wish to participate in the DCO Examination to make representations about the potential impacts on and interactions with our Development and, where appropriate, to secure appropriate mitigations. Concerns were previously highlighted to MOWF via a s48 consultation response and subsequent meeting. Our concerns as raised in the s48 response remain extant and we expect further meaningful engagement to seek to address the issues raised below and previously. We are open to addressing such matters within or outside the Examination process.	The West of Duddon Sands Wind farm is considered as part of the baseline in Volume 2, Chapter 10: Other sea users (APP-062) and has been considered in the cumulative screening for each topic where appropriate. Engagement has occurred with Morecambe Wind Limited and will continue throughout the examination phase.
RR-047.3	Our Development expects to continue to operate and be maintained in the long-term. It may be upgraded and repowered in future, and will then be decommissioned. Co-existence with our Development must be considered and protected over the long-term – and the acceptability of cumulative and in-combination impacts – must be properly assessed taking into account each of the above stages of our Development's life. Our Development requires that its operations, consents (including conditions), and any stakeholder agreements entered into by it are unaffected by MOWF. Our Development's concerns include the following.	An impact assessment, including the potential impact on the possible reduction or restriction of other offshore energy activities as a result of the Mona Offshore Wind Project, is presented in Volume 2, Chapter 10: Other sea users (APP-062). The scope of potential impacts, as set out in Table 10.6 of Volume 2, Chapter 10: Other sea users (APP-062), has been developed in consultation with relevant statutory and non-statutory stakeholders throughout the pre-application phase, which included consideration of matters raised in the section 42 consultation response from Morecambe Wind Limited. Potential impacts have been appropriately assessed in accordance with the process set out in Volume 1, Chapter 5: Environmental Impact Assessment methodology (APP-052). No adverse impacts were assessed as significant in Environmental Impact Assessment (EIA) terms.

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Reference	Relevant Representation Comment	Applicant's response
RR-047.4	<p>Issue one: The ES highlights potential significant impacts on wildlife features, including potential significant project-alone and in-combination impacts on marine mammals (F2.4). We are not convinced that the baseline and the predicted impacts are robust and align with our understanding of the local environment and we require to analyse this further. Future impacts of our Development, such as operation and maintenance, must be accounted for by MOWF and appropriate mechanisms must be put in place to facilitate co-existence and allow co-ordination to reduce potential cumulative or in-combination impacts.</p>	<p>As set out in Table 10.16 of Volume 2, Chapter 10: Other sea users (APP-062) the Mona Offshore Wind Project has committed to continued consultation through the life of the project, as required, with other offshore energy operators to minimise disruption to either party's operations and maximise coexistence.</p> <p>The Mona Offshore Wind Project has undertaken a robust assessment of potential impacts on marine wildlife informed by appropriate data sources from site specific surveys and detailed desktop studies, in accordance with relevant topic specific guidance. The assessment of potential impact to marine wildlife is presented four chapters: Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), Volume 2, Chapter 4: Marine mammals (APP-056) and Volume 2, Chapter 5: Offshore ornithology (APP-057).</p> <p>The evidence to inform the baseline and the approach to predicting effects on marine mammals were discussed and agreed through an Evidence Plan Process which included an Expert Working Group (EWG) for marine mammals as set out in section 4.5 of the Consultation Report (APP-037). To inform the Environmental Statement, site-specific surveys were undertaken, as agreed with the marine mammal EWG, across the Mona Array Area plus a buffer extending between 7 to 16.5 km. Further, and on advice from the marine mammal EWG, additional data sources and informative documents were identified post-scoping that were used to inform the baseline characterisation. All suggested data sources have been included in the baseline (Volume 6, Annex 4.1: Marine mammal technical report (APP-090)). The Applicant is therefore confident that the assessment of likely significant effects on marine mammals presented in Volume 2, Chapter 4: Marine mammals (APP-056) is based on the most scientifically robust evidence available and that sufficient precaution is built into the assessment. With respect to potential cumulative or in-combination effects, the assessment has considered all reasonably foreseeable (i.e. those with information in the public domain) projects, plans and activities.</p> <p>The Underwater sound management strategy (with Outline underwater sound management strategy included as part of the application, (APP-202)) will reduce the Mona Offshore Wind Project's contributions to the cumulative assessment, if required, post consent. Requirements for management measures and mitigation will be discussed in consultation with the licensing authority and statutory nature conservation bodies (SNCBs).</p> <p>As outlined in Volume 2, Chapter 10: Other sea users (APP-062) the Mona Offshore Wind Project has committed to consultation with other offshore energy</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-047.5	Issue two: The ES highlights extensive impacts on shipping and navigation and commits to stakeholder engagement (F2.7 7.14.1.2-7.14.1.4). We require to be involved in such engagement to ensure that our consents, agreements, and operations are not adversely affected by MOWF.	<p>operators to minimise disruption to either party's operations and maximise coexistence.</p> <p>The Applicant notes that West of Duddon Sands Windfarm is located more than 17 nm to the northeast of the Mona Array Area. It should be noted that the reference in paragraph 7.9.8.5 within Volume 2, Chapter 7: Shipping and navigation (APP-059) refers to the existing baseline conditions with the Mona Offshore Wind Project accounting for no material change in the density of traffic or proximity of vessel transits to West of Duddon Sands Windfarm.</p> <p>The Applicant has assessed the potential impacts of the Mona Offshore Wind Project on navigational risk for all marine users within the shipping and navigation study area within the Navigational Risk Assessment (APP-098). It was concluded that all hazards, including collision with wind farm service vessels and allision with wind turbines operated by other developers, had been reduced to As Low As Reasonably Practicable (as per section 1.9.8 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098)).</p> <p>The Applicant has committed within Volume 2, Chapter 7: Shipping and navigation (APP-059) to continue engagement with all stakeholders through the Marine Navigation Engagement Forum (MNEF) which includes Ørsted and other offshore wind energy developers.</p>
RR-047.6	Issue Three: We believe that MOWF will adversely affect the energy yield of our Development. Due to the proximity outlined in the above-referenced figure and table, there is the potential for MOWF to interfere with wind speed or direction at our Development causing reduction in energy output. This requires to be properly assessed and appropriately mitigated / compensated.	<p>Volume 2, Chapter 10: Other sea users of the Environmental Statement (APP-062) considers offshore energy receptors, including offshore wind farms. West of Duddon Sands Windfarm is considered as part of the baseline (section 10.5.2.9–14) in this chapter.</p> <p>APP-062 sets out that NPS EN-3 (paragraph 2.8.44) recognises that offshore wind development will occur in or close to areas where there is other offshore infrastructure. The project boundary requirements in the Crown Estate's Round 4 Information Memorandum specified that no offshore wind projects could be located within 7.5 km of an existing offshore wind farm. As described in APP-062 section 10.5.4, Figure 10.4 and Table 10.10, there are no other operational offshore wind farms located within 7.5 km of the Mona Array Area and therefore the Mona Offshore Wind Project location adheres to the TCE siting criteria.</p> <p>As referenced in Volume 2, Chapter 10: Other sea users (APP-062), a recent study commissioned by TCE indicated that, for the non-site-specific scenarios modelled, potential wake effects level off with approximately 10 km separation between offshore wind farms, and for separations much larger than 20 km wake effects become vanishingly small (Frazer-Nash Consultancy Limited, 2023).</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>The Mona Array Area has been reduced following the statutory pre-application consultation, as described in section 4.11.2 and Table 4.23 of Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (APP-051). This has increased the distance from the nearest existing operational wind farm by an additional 4.0 km, and also increased the distance from a number of other operational wind farms, thereby reducing the potential for wake effects. The distance between the Mona array area and West of Duddon Sands Windfarm is 31.9 km.</p> <p>On the basis of the distances between the Mona Array Area and other operational wind farms, including the West of Duddon Sands Windfarm, the potential for wake effects has been scoped out of further assessment of impact on other sea users.</p>

## 2.48 Mr & Mrs Davies

Table 2.48: RR-048 – Mr & Mrs Davies

Reference	Relevant Representation Comment	Applicant's response
RR-048.1	I want the opportunity to provide comments on the draft DCO, book of reference, environmental statement together with other documents and items.	The Applicant notes the representation and welcomes the comments on the documents listed once the interest has had an opportunity to review. The Applicant will continue negotiations of the heads of terms and associated option agreements.



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**2.49 Mr & Mrs T J Owens**

**Table 2.49: RR-049 – Mr & Mrs T J Owens**

Reference	Relevant Representation Comment	Applicant's response
RR-049.1	<p>The Mona project has not adequately considered and mitigated the potential affects to Nant Fawr and other properties in close proximity to the construction areas in and around Y Nentydd. There is limited design information or lack of detail in Code of Construction Practice, PEIR, draft DCO and Work Plans.</p>	<p>The Applicant is aware of the interest and notes the representation. The Applicant will continue to engage with Mr and Mrs Owen and their agent through negotiations of the heads of terms and associated option agreements throughout the examination. The documents listed in the representation which have been submitted by the Applicant include the detail required as set out in the Planning Act 2008.</p>
RR-049.2	<p>Inadequate information provided for accurate assessment on the significance impacts to the Property from:</p> <ul style="list-style-type: none"> <li>o Construction traffic, vehicle movements and haul road construction</li> <li>o Noise</li> <li>o Vibration</li> <li>o Lighting</li> <li>o Dust/Fumes</li> <li>o Soil Storage and Management</li> <li>o Environmental impacts and mitigation areas</li> <li>o Footpath and PROW diversions</li> <li>o Decommissioning</li> <li>o HDD locations and working requirements</li> <li>o Construction compounds and storage locations</li> <li>o Temporary and Permanent Works access routes</li> <li>o Construction Programme</li> </ul> <p>Further detailed proposals necessary in order to consider impacts and mitigation options ahead of DCO examination process.</p>	<p>The Applicant will continue to engage with Mr and Mrs Owen and their agent to understand what further information is being requested on those items set out in the representation.</p> <p>Potential impacts associated with widespread disruption to traffic flows and the public highway generally are considered within Volume 3, Chapter 8: Traffic and Transport (APP-071). The Applicant has also prepared an Outline Construction Traffic Management Plan (APP-225) which includes detail on access routes.</p> <p>Measures to mitigate the potential impacts of dust, noise and vibration as a result of the construction of the Mona Offshore Wind Project are set out the Outline Dust Management Plan (APP-214) and the Outline Construction Noise and Vibration Management Plan (APP-215), which form part of the Code of Construction Practice (CoCP). The mitigation measures will be monitored by the Applicant throughout the construction phase. The CoCP is secured by Requirement 9 of the draft DCO (AS-010 to be superseded by C1 Draft Development Consent Order F03). Final versions of the Dust Management Plan and the Construction Noise and Vibration Management Plan will be implemented as approved by the relevant local planning authority.</p> <p>Soil Storage and Management will be undertaken in accordance with the final Soil Management Plan. The Plan will be based on the principles set out in the Outline Soil Management Plan (APP-220). The Plan forms part of the CoCP, which is secured as a Requirement of the draft DCO (C1 Draft Development Consent Order F03).</p> <p>The Applicant is committed to developing the Mona Offshore Wind Project in a way that is sensitive to the environment, minimising effects wherever possible. Impacts have been carefully assessed and appropriate mitigation identified is secured through the draft DCO (C1 Draft Development Consent Order F03). A</p>

**MONA OFFSHORE WIND PROJECT**

Reference	Relevant Representation Comment	Applicant's response
		<p>detailed analysis of alternatives examined is provided at Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4) – this demonstrates the process the Applicant followed in identifying suitable sites for the onshore elements of the Mona project with regard to environmental and other constraints.</p> <p>Detail on the management or diversion of the Footpaths and Public Rights of Way can be found in the Outline Public Rights of Way Management Strategy (APP-299) which sets out measures to be implemented during the construction phase.</p> <p>The Applicant has included detail on decommissioning, HDD locations, decommissioning and programme detail within the Volume 1, Chapter 3: Project Description submitted as part of the Application for the Mona Offshore Wind Project.</p>
RR-049.3	<p>Despite the baseline noise assessment location at LT10 limited assessment has been carried out in the adjacent area despite several properties clearly lying within high impact noise zones for evening and weekend working.</p>	<p>The baseline sound survey (ES Volume 7, Annex 9.1: Baseline Sound Survey (APP-178)) was undertaken 12 locations along the Mona Onshore Cable Corridor at locations representative of receptors situated in the vicinity of the proposed construction works. The locations of the sound survey were discussed and agreed with the relevant planning authorities.</p> <p>The results from the baseline sound survey have been used to undertake a construction noise and vibration assessment (ES Volume 7, Annex 9.2: Construction Noise and Vibration Technical Report (APP-179) to identify the potential for noise impacts to occur during construction activities and construction traffic associated to the Mona Offshore Wind Project. The study area for the assessment includes noise sensitive receptors located within 300 m of the Onshore Development Area; 1km of the Landfall and Mona Onshore Substation; and 50 km of the Mona Array Area. The potential noise impacts are assessed in ES Volume 3, Chapter 9: Noise and Vibration (APP-072) and no significant adverse effects are predicted from the construction of the Mona Onshore Cable Corridor or from construction traffic on the local highway network.</p>

## 2.50 Mr AEM Owen & A Owen Cyf

Table 2.50: RR-050 – Mr AEM Owen & A Owen Cyf

Reference	Relevant Representation Comment	Applicant's response
RR-050.1	<p>In capacity of agent for our client (being in respect of Owners / Occupiers of land proposed to be affected by the intended scheme ) I anticipate the potential need to submit representations on ,for instance -:</p> <ul style="list-style-type: none"> <li>• The draft Development Consent Order</li> <li>• The Book of Reference</li> <li>• The Outline landscape &amp; Ecology Management Plan</li> <li>• The Outline Construction Fencing Plan</li> <li>• Outline Soil Management Plan</li> <li>• The Tree &amp; Hedgerow Plan</li> <li>• The Published Soils &amp; Agricultural Land classification Data Technical Report</li> <li>• The Outline Biosecurity Protocol</li> <li>• Matters applying to construction /installation of cables and ancillary apparatus.</li> <li>• Mitigating damage and land reinstatement methodology.</li> </ul>	<p>The Applicant notes the representation and will continue to engage with DMPC and their clients on those items set out in the representation through the course of the examination and through negotiations of the heads of terms and associated option agreements.</p>

## 2.51 Mr EW Roberts

Table 2.51: RR-051 – Mr EW Roberts

Reference	Relevant Representation Comment	Applicant's response
RR-051.1	<p>In capacity of agent for our client (being in respect of Owners / Occupiers of land proposed to be affected by the intended scheme ) I anticipate the potential need to submit representations on ,for instance -:</p> <ul style="list-style-type: none"> <li>• The draft Development Consent Order</li> <li>• The Book of Reference</li> <li>• The Outline landscape &amp; Ecology Management Plan</li> <li>• The Outline Construction Fencing Plan</li> <li>• Outline Soil Management Plan</li> <li>• The Tree &amp; Hedgerow Plan</li> <li>• The Published Soils &amp; Agricultural Land classification Data Technical Report</li> <li>• The Outline Biosecurity Protocol</li> <li>• Matters applying to construction /installation of cables and ancillary apparatus.</li> <li>• Mitigating damage and land reinstatement methodology.</li> </ul>	<p>The Applicant notes the representation and will continue to engage with DMPC and their clients on those items set out in the representation through the course of the examination and through negotiations of the heads of terms and associated option agreements.</p>

## 2.52 Mr G & Mrs M Williams

Table 2.52: RR-052 – Mr G & Mrs M Williams

Reference	Relevant Representation Comment	Applicant's response
RR-052.1	<p>In capacity of agent for our client (being in respect of Owners / Occupiers of land proposed to be affected by the intended scheme ) I anticipate the potential need to submit representations on ,for instance -:</p> <ul style="list-style-type: none"> <li>• The draft Development Consent Order</li> <li>• The Book of Reference</li> <li>• The Outline landscape &amp; Ecology Management Plan</li> <li>• The Outline Construction Fencing Plan</li> <li>• Outline Soil Management Plan</li> <li>• The Tree &amp; Hedgerow Plan</li> <li>• The Published Soils &amp; Agricultural Land classification Data Technical Report</li> <li>• The Outline Biosecurity Protocol</li> <li>• Matters applying to construction /installation of cables and ancillary apparatus.</li> <li>• Mitigating damage and land reinstatement methodology.</li> </ul>	<p>The Applicant notes the representation and will continue to engage with DMPC and their clients on those items set out in the representation through the course of the examination and through negotiations of the heads of terms and associated option agreements.</p>

## 2.53 Mr H & Mrs C Lloyd

Table 2.53: RR-053 – Mr H & Mrs C Lloyd

Reference	Relevant Representation Comment	Applicant's response
RR-053.1	<p>In capacity of agent for our client (being in respect of Owners / Occupiers of land proposed to be affected by the intended scheme ) I anticipate the potential need to submit representations on ,for instance -:</p> <ul style="list-style-type: none"> <li>• The draft Development Consent Order</li> <li>• The Book of Reference</li> <li>• The Outline landscape &amp; Ecology Management Plan</li> <li>• The Outline Construction Fencing Plan</li> <li>• Outline Soil Management Plan</li> <li>• The Tree &amp; Hedgerow Plan</li> <li>• The Published Soils &amp; Agricultural Land classification Data Technical Report</li> <li>• The Outline Biosecurity Protocol</li> <li>• Matters applying to construction /installation of cables and ancillary apparatus.</li> <li>• Mitigating damage and land reinstatement methodology.</li> </ul>	<p>The Applicant notes the representation and will continue to engage with DMPC and their clients on those items set out in the representation through the course of the examination and through negotiations of the heads of terms and associated option agreements.</p>

## 2.54 Mr Roberts

Table 2.54: RR-054 – Mr Roberts

Reference	Relevant Representation Comment	Applicant's response
RR-054.1	I want the opportunity to provide comments on the draft DCO, book of reference, environmental statement together with other documents and items.	The Applicant notes the representation and welcomes the comments on the documents listed once the interest has had an opportunity to review. The Applicant will continue negotiations of the heads of terms and associated option agreements.

## 2.55 Mr RW Roberts

Table 2.55: RR-055 – Mr RW Roberts

Reference	Relevant Representation Comment	Applicant's response
RR-055.1	<p>In capacity of agent for our client (being in respect of Owners / Occupiers of land proposed to be affected by the intended scheme ) I anticipate the potential need to submit representations on ,for instance -:</p> <ul style="list-style-type: none"> <li>• The draft Development Consent Order</li> <li>• The Book of Reference</li> <li>• The Outline landscape &amp; Ecology Management Plan</li> <li>• The Outline Construction Fencing Plan</li> <li>• Outline Soil Management Plan</li> <li>• The Tree &amp; Hedgerow Plan</li> <li>• The Published Soils &amp; Agricultural Land classification Data Technical Report</li> <li>• The Outline Biosecurity Protocol</li> <li>• Matters applying to construction /installation of cables and ancillary apparatus.</li> <li>• Mitigating damage and land reinstatement methodology.</li> </ul>	<p>The Applicant notes the representation and will continue to engage with DMPC and their clients on those items set out in the representation through the course of the examination and through negotiations of the heads of terms and associated option agreements.</p>



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**2.56 Mrs H M Parry**
**Table 2.56: RR-056 – Mrs H M Parry**

Reference	Relevant Representation Comment	Applicant's response
RR-056.1	I am one of the owners of plots 06-101, 06-102, 06-103, 06-104, 06-105 and wish to object to the proposed cable route on the following non exhaustive grounds: The Promoter has failed to consider all reasonable options for power transmittal methods – Evidence will be adduced at Inquiry for this.	<p>The Applicant has undertaken a rigorous and robust site selection process in relation to the onshore cable route for the Mona Offshore Wind Project.</p> <p>A full reasoning and justification for the selection of the onshore cable route is provided in Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). This is also supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p>
RR-056.2	The Promoter has failed to consider all reasonable route options that would score equally well in its BRAG report – Evidence will be adduced at Inquiry for this.	<p>The optimum route for an onshore grid connection is generally considered to be the shortest route from A to B from landfall to Bodelwyddan National Grid Substation. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore cable route.</p>
RR-056.3	The Promoter has failed to consider a combination of different power transmittal methods and reasonable route options that would score equally well in its BRAG report – Evidence will be adduced at Inquiry for this.	<p>Decisions made by the Applicant in response to landowner and consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible.</p> <p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons. This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
RR-056.4	The current power transmittal proposals will not cater for the full generation capacity of Mona Offshore Windfarm leading to a bottleneck in the power supply. This also curtails the capacity for future upgrades. This would not be the case in the event of different transmittal methods and better route	<p>The Applicant can confirm that the base case design constitutes 4 circuits of 220kv cables, with each circuit having the transmittal capacity of circa 375MW. These details are confirmed in Section 3.7.2 of Volume 1, Chapter 3: Project Description (APP-050). On this basis, there will be sufficient transmittal capacity for the Mona Offshore Wind Project.</p>

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Reference	Relevant Representation Comment	Applicant's response
	selection or a combination of both – Evidence will be adduced at Inquiry for this.	Please see the above Relevant Representation Responses (RR-056.1-3) regarding Site Selection & Consideration of Alternatives and Engineering Feasibility Assessment aspects for the detailed responses.
RR-056.5	Locally the land take is extremely excessive and this could be significantly reduced by different transmittal methods and better route selection or a combination of both – Evidence will be adduced at Inquiry for this.	<p>The Applicant has undertaken a rigorous and robust site selection process in relation to the onshore cable route for the Mona Offshore Wind Project.</p> <p>A full reasoning and justification for the selection of the onshore cable route is provided in Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). This is also supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p> <p>The optimum route for an onshore grid connection is generally considered to be the shortest route from A to B from landfall to Bodelwyddan National Grid Substation. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore cable route.</p> <p>Decisions made by the Applicant in response to consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible.</p> <p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons. This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
RR-056.6	The land has special value to us and future proposals over other land locally and cannot be replaced – Evidence will be adduced at Inquiry for this.	The principle point of land value is not a matter for the examination and will be addressed through negotiations. However, the point is noted and the Applicant looks forward to receiving evidence testing to the value suggested through voluntary negotiations.
RR-056.7	Requests to consider alternative arrangements have been brushed aside with little or no consideration by the Promoter.	Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and

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Reference	Relevant Representation Comment	Applicant's response
	<p>There is little or no regard for the impacts on us which is very unfair – Evidence will be adduced at Inquiry for this.</p>	<p>geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons. This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p> <p>In addition to the strategic-level decision making, a preliminary Engineering feasibility assessment undertaken to define the scope of the Mona Offshore Wind Project stipulated that underground cables are less affected by weather conditions, offer higher reliability and security than overhead cables, are less prone to interference from external factors, reduce the risk of electrocution or injury to people or animals, are less prone to explosion or fire, and are easier to maintain.</p> <p>The Applicant carried out a statutory consultation in 2023; this is a key part of the planning process, which the Applicant undertook in order to understand community views. The Applicant submitted a Consultation Report (APP-037) with its DCO application that explained 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.</p> <p>The Applicant will continue to engage with Mrs H M Parry throughout the Examination process and is keen to understand any further information that can be provided.</p>
<p>RR-056.8</p>	<p>The scheme, certainly to the extent that our land is concerned, has been designed for the convenience of the Promoter and also minimising their costs in order to maximise their return on investment rather than on the basis of there being a compelling case in the public interest overriding the harm done to us as the impacted landowners – Evidence will be adduced at Inquiry for this.</p>	<p>The land take proposed for the scheme is proportionate to the works required and applicant will seek to minimise land take through construction where possible. Heads of terms which include consideration for the rights sought and disturbance caused have been issued and are being negotiated.</p> <p>The Statement of Reasons (APP-029) sets out the Applicant's justification for seeking powers of compulsory acquisition, and that a compelling case exists in the public interest which justifies the making of the DCO with those powers.</p>
<p>RR-056.9</p>	<p>In addition to consultation failings and lack of any meaningful sincere engagement beyond the minimum necessary lip service believed to be necessary to secure these draconian CPO powers, the Promoter has sought to discourage and disincentivise proper debate at Public Inquiry by declining to produce hard copies of the documents to statutory objectors. As can be seen from the DCO notice received on 26 March 2024 they will charge up</p>	<p>The Applicant is a responsible developer committed to listening to the views of stakeholders including landowners and members of the local community. Statutory consultation is a key part of the planning process, one which the applicant took seriously; a Consultation Report was submitted with the DCO application (APP-037) explaining how the Applicant complied with the pre-application consultation requirements set down in the Planning Act 2008 and had regard to all the feedback submitted.</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>to £7,000 to provide hard copies of their reports and documents. One of the co-owners, my mother is in their late 80's unable to drive and with vision difficulties and unable to read a computer screen and yet the Promoter expects her to travel to either Llandudno or Rhyl in order to inspect hard copies of the document as the Promoter's charges for them are simply prohibitive.</p>	<p>From the outset, the Applicant promoted a digital-first consultation and designed a project website that is easily accessible to a wide range of users. That said, the Applicant consulted using a variety of methods to help explain the proposals and encourage people to provide their comments. Community focused materials included a consultation postcard, website, brochure and a non-technical summary of the PEIR (PEIR NTS). The Applicant also organised a series of consultation events, located at accessible public locations, where a full copy of the PEIR was available for reference, as well as large scale maps with further details on the locations for attendees to view and discuss. Project 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.</p> <p>When the Applicant's application for a DCO was accepted the digital-first approach continued, with all documents available on the project's pages on the National Infrastructure Planning website. With the volume of the full suite of documents in the many thousands of pages, the Applicant's Section 56 notification offered assistance to anyone with accessing the documents relevant to them: "If you require an alternative method for inspection of the DCO application or have any queries, including how to access the documents on the Planning Inspectorate's website, please call the Applicant on 0800 860 6263 or email <a href="mailto:info@monaoffshorewind.com">info@monaoffshorewind.com</a>."</p> <p>Again, due to the volume of the full suite of documents, and with particular reference to the Applicant's commitment to the environment and sustainability, it was deemed reasonable to charge a fee for printed materials: "The Applicant can also provide any of the documents as required on a USB (free of charge). Hard copies of the NTS can also be provided upon reasonable request. Provision of hard copies of the ES will be subject to a maximum charge of £7,000, plus VAT, to cover printing and delivery costs." The Applicant considers its commitments to aiding people with the use of resources to be more than reasonable.</p> <p>The Applicant received requests for printed copies of all DCO application documents from the representative of the four named respondents. Following a discussion with said representative about the volume of documents that makes up the DCO application, the Applicant offered a view on which documents it thought would be of most relevance (works plans, land plans, statement of reasons and site selection BRAG) and offered to send hard copies of these free of charge.</p> <p>The representative responded stating this "may be a sensible compromise" and requested that the Applicant initially forward a link to the pdf of the statement of</p>

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Reference	Relevant Representation Comment	Applicant's response
		reasons and a list of all the documents in the document library in pdf format for consideration. These links were shared, and at time of writing, no further response had been received.
RR-056.10	In addition to the above summary please see formal letter of objection dated 3rd May 2024 submitted by post and email to the planning inspectorate and National Infrastructure Commission. We look forward to explaining the above issues in detail to the inspector at the Inquiry	This is noted by the Applicant. The Applicant welcomes discussion on detailed points through negotiations of the heads of terms.
RR-056.11	Dear Sirs We have been notified that MONA OFFSHORE WIND LTD ("Promoter") has made the above application for Compulsory Purchase Powers and we wish to object to the confirmation of this order as submitted on the following non exhaustive grounds:	This is noted by the Applicant and heads of terms for a voluntary agreement have been issued and we look forward to progressing negotiations of those.
RR-056.12	<p>1.0 Introduction and background</p> <p>1.1 We are Harriett Mary Parry, Robert Wynne Parry, Griffith Wayne Parry, and Elizabeth Wynne Wade ("Objectors") being the joint owners of land ("Property") affected by this Development Consent Order ("DCO").</p> <p>1.2 The Property is identified as Plots 06-101, 06-102, 06-103, 06-104c, 06-105 in the Book of Reference and on the Mona Land Plan.</p> <p>1.3 In line with current government policy although entirely for private profit, the Promoter is proposing to construct scheme to build an offshore wind farm comprising of up to 96 wind turbines within an area of circa 300 square KM offshore from Abergele in North Wales.</p> <p>1.4 Whilst estimates vary according to source and the dates, the Promoter claims that the scheme will generate up to 1.5 Gigawatts of electrical power and this power is intended to be transmitted from its point of landfall between Llandulas and Abergele and then by underground cables to a substation at Bodelwyddan behind St Asaph Business Park.</p> <p>1.5 Notwithstanding that this is a scheme for private commercial profit, the Promoter has sought to use statutory</p>	The Applicant notes the points raised.

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Reference	Relevant Representation Comment	Applicant's response
	<p>public DCO powers under Section 56 of the Planning Act 2008 to assemble the land that it considers necessary to accommodate its scheme.</p> <p>1.6 The relevant notification of making of the CPO issued by the Acquiring Authority and received by the Objectors is dated 26th March and specifies that Objections must be made 'by 6th May 2024'.</p> <p>1.7 The Objectors are a "qualifying person" within the meaning of s.12(2) of the Acquisition of Land Act 1981 and are therefore statutory objectors.</p> <p>1.8 The Objectors are also "Affected Persons" for the purposes of Section 59 and 92 of the Planning Act 2008.</p> <p>1.9 Whilst the Objectors' points of objection are the same and hence are recorded in this single letter of objection, there are in fact 4 separate individual parties objecting here and they should be treated individually as Objectors in their own right.</p>	
RR-056.13	<p>1.10 Section 122 of the Planning Act 2008 states:-            "122 Purpose for which compulsory acquisition may be authorised</p> <p>(1) An order granting development consent may include provision authorising the compulsory acquisition of land only if the [F1 Secretary of State] is satisfied that the conditions in subsections (2) and (3) are met.</p> <p>(2) The condition is that the land -</p> <p>(a) is required for the development to which the development consent relates,</p> <p>(b) is required to facilitate or is incidental to that development, or</p> <p>(c) is replacement land which is to be given in exchanged for the order land under section 131 or 132.</p> <p>(3) The condition is that there is a compelling case in the public interest for the land to be acquired compulsorily."            (emphasis added)</p>	<p>This is noted and welcomed by the Applicant.</p> <p>The Applicant can confirm that the Mona Offshore Wind Project understands the requirements for which compulsory acquisition may be authorised.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-056.14	<p>1.11 Lord Justice McGowan noted in Sharkey V Buckinghamshire District Council that "required" in 2) a) of Section 122 of the Planning Act 2008 does not mean that the land in question has to be "indispensable" however it does not mean that the land is merely "desirable" or "convenient" for the purposes of the scheme either.</p> <p>1.12 It should be further noted that confirmation of the Order also depends on meeting the test that there is a compelling case in the public interest for the land to be acquired compulsorily in Section 3) of the 122 of the Planning Act 2008.</p> <p>1.13 Section 13 of the "Guidance on Compulsory purchase process and The Crichel Down Rules" produced by the Department for Levelling Up, Housing and Communities July 2019 states:"13. How will the confirming minister consider the acquiring authority's justification for a compulsory purchase order? The minister confirming the order has to be able to take a balanced view between the intentions of the acquiring authority and the concerns of those with an interest in the land that it is proposing to acquire compulsorily and the wider public interest. (emphasis added) Section 18 of the Memorandum to Circular 06/04 ends with :..... Parliament has always taken the view that land should only be taken compulsorily where there is clear evidence that the public benefit will outweigh the private loss. The Human Rights Act reinforces that basic requirement. (emphasis added)</p>	<p>This is noted and welcomed by the Applicant.</p> <p>The Applicant can confirm that the Mona Offshore Wind Project understands the requirements for which compulsory acquisition may be authorised.</p>
RR-056.15	<p>1.14 Evidence will be adduced to demonstrate that much of the design of the scheme, certainly to the extent that it impacts on landowners and certainly the Objectors and the Property, has been developed for general and commercial convenience to the Promoter and infurtherance of its private profit rather than from the view that there is a compelling case in the public interest that outweighs the harm done. In its commercial pursuit, the Promoter has failed to take proper account of representations from the Objectors which is unfair.</p>	<p>The Applicant has undertaken a rigorous and robust site selection process in relation to the onshore cable route for the Mona Offshore Wind Project.</p> <p>A full reasoning and justification for the selection of the onshore cable route is provided in Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). This is also supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p> <p>The optimum route for an onshore grid connection is generally considered to be the shortest route from A to B from landfall to Bodelwyddan National Grid</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-056.16	<p>1.15 In addition to the above the Objectors wish to object to the Order on the following non exhaustive grounds:</p> <p>2.0 The Onshore Power Transmittal Route Generally</p> <p>2.1 The applicant has not demonstrated that the route proposed is the most appropriate route for the scheme. The Power Transmittal Route seeks to terminate at a substation at Bodelwyddan which, as the crow flies, is some 10KM from where the cable breaks land. The route selection report purports to have carried out a Brown Red Amber Green ("BRAG") report to show that the 14.75KM route selected is optimum. However at least 4 alternative routes have been identified and evidence will be adduced to demonstrate how they are at least equivalent to and often superior to the selected route in terms of the BRAG report and general common sense.</p>	<p>Substation. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore cable route.</p> <p>Decisions made by the Applicant in response to consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible.</p> <p>The Statement of Reasons (APP-029) sets out the Applicant's justification for seeking powers of compulsory acquisition, and that a compelling case exists in the public interest which justifies the making of the DCO with those powers.</p>
RR-056.17	<p>3.0 General Disruption During Construction</p> <p>3.1 The implementation of the scheme on shore will be extremely disruptive both on private land and to the wider public for instance by it causing widespread disruption to traffic flows and the public highway generally and thereby to statutory and essential services to locals and visitors including tourists. This will be to the detriment of local, businesses, residents and visitors alike. It is also likely to cause noise, dust, vibration, fumes and other disturbances generally which are a concern. The Promoter has failed to evidence that these have been given proper consideration when developing its scheme.</p>	<p>The Applicant has considered potential impacts associated with traffic and transport, noise and vibration, air quality and socio-economics as part of the project development and has assessed each topic in the Environmental Statement.</p> <p>Potential impacts associated with widespread disruption to traffic flows and the public highway generally are considered within Volume 3, Chapter 8: Traffic and Transport (APP-071). No significant adverse impacts are identified during the construction phase.</p> <p>Potential impacts associated with noise and vibration are considered within Volume 3, Chapter 9: Noise and Vibration (APP-072). No significant adverse impacts are identified during the construction phase.</p> <p>Potential impacts associated with dust and fumes are considered within Volume 3, Chapter 10: Air Quality (APP-073). No significant adverse impacts are identified during the construction phase.</p> <p>Potential impacts associated with widespread disruption to locals and visitors including tourists are considered within Volume 4, Chapter 3: Socio-economics (APP-077). No significant adverse impacts are identified during the construction phase.</p>
RR-056.18	<p>4.0 The Onshore Power Transmittal Methodology</p> <p>4.1 Pylons</p>	<p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were</p>



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Reference	Relevant Representation Comment	Applicant's response
	<p>4.1.1 The Promoter has dismissed pylons as a means of power transmittal simply on the grounds of "aesthetics" without adequate or indeed any consideration of other factors and advantages. Neither has the Promoter considered the use of existing pylons already in situ. The Promoter has also failed to consider a proposal whereby power transmittal could be partly by pylon and partly by underground cable. Evidence will be adduced to demonstrate how adopting a more open minded approach to these methodologies achieves a considerably better solution for all parties, including the Promoter, rather than the one currently proposed which is instead driven by Promoter convenience and maximizing rates of return.</p>	<p>considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
RR-056.19	<p>Underground Cables</p> <p>4.2.1 The Promoter's preference is for underground cables through previously undisturbed virgin lands largely within Conwy Council's "Special Landscaped Area".</p>	<p>The Applicant notes the concern regarding the locally designated Special Landscape Areas (SLAs). An assessment of effects on the special characteristics of the local landscape designations – Rhyd y Foel to Abergele SLA and Elwy and Aled Valleys SLAs – is contained within Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p> <p>The potential impact is assessed as a moderate adverse effect, which is considered not significant in EIA terms.</p>
RR-056.20	<p>4.2.2 However, due to issues with cables heating then the Promoter is limited in the capacity of cable that can be deployed underground thereby necessitating 4 cables which, the Objector is told will sterilize a 30Metre strip of their Property. Cables on pylons are open to the environment and the benefits of air cooling and so can carry a much higher capacity and so less cables and consequently, less easement width would be needed. The scale of the powers sought therefore go beyond that which is reasonably required to achieve the implementation of the Scheme.</p>	<p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
RR-056.21	<p>4.2.3 The Promoter claims that 1.5Gigawatts of electricity will be generated and this will require a transmittal cable capacity of 1.5MVA. They advise that this will be accommodated in 4 cables with considerable distances between them so that a large area of 30 metres in width is required for an easement and is land which will be sterilized by the scheme. However, the Statement of Reasons advises</p>	<p>Please see above Relevant Representation Response regarding the Mona Offshore Wind Project Transmittal Capacity (RR-056.4), Site Selection &amp; Consideration of Alternatives and Engineering Feasibility Assessment (RR-056.1-3) aspects for the detailed responses.</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>that a capacity of only up to 225- 275KVA will be provided for each of the 4 cables thereby only giving transmittal power of 1 M KVA or 1 GigaWatt. Underground cabling will therefore be a bottleneck in the amount of power that the current scheme can produce as well as stymie future upgrades which could easily be overcome had the Promoter considered an above ground pylon scheme.</p>	
RR-056.22	<p>4.2.4 Evidence will be adduced that effective alternative arrangements could be installed with the cables that can assist with for instance, venting and cooling, but other issues as well and increase the capacity of the cable runs that are there and again reduce the need for this excessive width of easement and consequent and unnecessary sterilization of the land.</p>	<p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons. This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
RR-056.23	<p>5.0 The Onshore Route Selection Locally and Impact on Objector</p> <p>5.1 Locally the cable travels from a North Westerly direction towards the A548 but crosses the B5381 into plot 06-100 in a gradual sweeping arc over the A548 and into the objector's land. Unnecessarily, the entirety of the Objector's frontage to the A548 (almost 290 meters) is within the Limits of Deviation and a similar amount to the frontage of plot 06-100. The cables splay out to take this 90 degree bend as slowly and gradually as they possibly can. However this is not a water or sewerage pipe or high pressure hydrocarbon or gas or some other hazardous liquid transmitted under pressure necessitating a gradual circumference. It is understood that electricity is quite able to endure sharp 90 degree turns and bends which would greatly lessen the impact in terms of amount of land affected on the objector's plots as well as on the neighbouring plots 06-100. A request to look into and amend this issue has been ignored by the promoter.</p>	<p>The Applicant has considered a number of factors when proposing the alignment (and therefore the potential land take) of the onshore cable route, as detailed in Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p> <p>The alignment of the proposed onshore cable route, where it passes under the A548 near the Objector's land, is not dictated by the cable design but by several other factors. The primary factor being the proposed trenchless crossing approach for road and utility crossings adopted by the Mona Offshore Wind Project. Trenchless drilling allows the Applicant to place a conduit under the roads in which a cable is then installed, without having to close them or place any constraint on the traffic flows during their installation. Trenchless drilling techniques have limits on the minimum radius that conduits can be installed and are constrained by ground conditions, conduit sizing and materials, and restrictions placed by third parties. As the power cables also have to be pulled into the conduit, the pulling tensions on the cables also need to be considered, so although cables can be laid to reasonably tight radii, they cannot be pulled through conduits with the same radii without putting excessive tension on the cables and causing damage.</p> <p>It is not the cable design that dictates the onshore cable route alignment across the A548 but the engineering design along with land and consent-based constraints.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-056.24	<p>5.2 The Objectors land has a special value to them arising from the unique potential not present or available to the parcels on the other 3 quadrants of Pen Yr Efail Crossroads.</p> <p>In an attempt to preserve that position a request was made that the Promoter positioned the cables so that they travelled slightly further to the south along plot 06-100 (the owner of which is understood to be in advanced discussions with the Promoter towards accepting the cables) and crossed to the south of Property and to the south of the pylons already in place there before resuming the route to the far south of the Objector's Property beyond the land already sterilised by the existing pylons. The response obtained on 11 /09/23 via the Promoter's agent's was: "that to go to the south of the line, we would need to cross an additional road and then be running parallel between the pylon route in your land and the one just to the south, which again would be very limiting." This demonstrates how the Promoter is aware of alternative arrangements but has not been prepared to consider them preferring to dismiss them out of hand merely due to their being slightly more commodious to itself. It has instead selected the Objector's property for convenience as well as commercial reasons rather than for compelling reasons in the public interest which outweigh the loss suffered by the affected party to whom no regard has been given.</p>	<p>The principle point of land value is not a matter for the Examination and will be addressed through direct negotiations. However, the point is noted, and the Applicant looks forward to receiving evidence testing to the value suggested through voluntary negotiations.</p> <p>As detailed in Response to Relevant Representation RR-056.23 "The Applicant has considered a number of factors when proposing the alignment (and therefore the potential land take) of the onshore cable route, as detailed in Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082)". Engineering constraints based on moving the route to the south of the northern set of pylons include:</p> <ul style="list-style-type: none"> <li>• Additional land requirements to the west of the A548 to accommodate the trenchless technique under the road. Moving the crossing point south also makes the angle for crossing the road more acute which will reduce engineering feasibility of the trenchless technique at this location and also increases the pulling tension on the cables due to a tighter horizontal radius which increases the risk of damaging cables during installation.</li> <li>• Moving the proposed Order Limits south at the crossroad would create road safety issues off the A548 into the compound due to the road alignment and the junction to the south.</li> <li>• From an electrical perspective, running the cable circuits between two parallel overhead lines is not advisable due to the potential of induced currents. The Applicant is also limited by the working areas for both lines identified in the protective provisions, so the net corridor width is not sufficient for construction purposes.</li> <li>• The design philosophy and industry practice are to cross exiting utilities at a perpendicular angle, the alignment chosen enables the Applicant to do this. If The Objectors proposed route was utilised, between the pylons there are additional existing utilities that would either have to be crossed at an acute angle or diverted to facilitate our works.</li> </ul> <p>If it has not been possible to avoid or reduce the impact on a particular landowner, then this has been because of the requirements for Engineering feasibility or to avoid potential impacts associated with environmental constraints, as demonstrated above.</p>
RR-056.25	<p>5.3 Insufficient evidence has been provided to demonstrate that this project will secure the most efficient and effective use of the Property which is unique in planning and amenity</p>	<p>The Applicant disagrees that insufficient evidence has been provided. A full explanation of the site selection and consideration of alternatives process is detailed within Volume 1, Chapter 4: Site Selection and Consideration of</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>terms enabling it to be deployed for a number of alternative options and uses not available to adjacent and neighbouring land. This will be to the detriment of the local community and economy.</p>	<p>Alternatives (APP-051). The Applicant will continue to work with the landowner regarding potential opportunities associated with the Property and looks forward to receiving evidence testing to the value suggested through voluntary negotiations.</p>
RR-056.26	<p>5.4 The Order, if confirmed, will sterilize not only the excessive route of the cable but also</p> <p>render the retained land sterile by virtue of the fact that it will be unfeasible to develop in isolation. This would not be the case if the transmittal route or methodology selected was different or in fact that requested small local changes had been taken seriously and accommodated.</p>	<p>The Applicant has sought to micro site the route where possible to accommodate landowner requests and has considered a number of factors when proposing the alignment (and therefore the potential land take) of the onshore cable route, as detailed within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051).</p> <p>However, due to several environmental constraints as listed above in the detailed response to RR-056.24, the following points can also be noted:</p> <ul style="list-style-type: none"> <li>• There are additional land requirements at the crossing to facilitate the trenchless technique design and to accommodate the proposed temporary construction compounds.</li> <li>• Regarding land sterilisation, the easement area will have limitations on what can be accommodated in the future, however development losses which can be evidenced as a direct result of the project, can be compensated for.</li> </ul>
RR-056.27	<p>6.0 Consultation</p> <p>6.1 In addition to the evidence of poor consultation and lack of any meaningful engagement beyond the minimum necessary lip service believed to be necessary to secure these draconian powers, the Promoter has sought to discourage and disincentivise proper debate at Public Inquiry by declining to produce hard copies of the documents to statutory objectors. The DCO notice received on 26 March 2024 advised as follows: "Provision of hard copies of the ES will be subject to a maximum charge of £7,000, plus VAT, to cover printing and delivery costs." One of the Objectors is in their late 80's unable to drive and with vision difficulties and unable to read a computer screen and yet the Promoter expects her to travel to either Llandudno or Rhyl in order to inspect hard copies of the document as the Promoter's charges for them are simply prohibitive.</p>	<p>The Applicant is a responsible developer committed to listening to the views of stakeholders including landowners and members of the local community. Statutory consultation is a key part of the planning process, one which the Applicant took seriously; a Consultation Report was submitted with the DCO application (APP-037) explaining how the Applicant complied with the pre-application consultation requirements set down in the Planning Act 2008 and had regard to all the feedback submitted.</p> <p>From the outset, the Applicant promoted a digital-first consultation and designed a project website that is easily accessible to a wide range of users. That said, the Applicant consulted using a variety of methods to help explain the proposals and encourage people to provide their comments. Community focused materials included a consultation postcard, website, brochure and a non-technical summary of the PEIR (PEIR NTS). The Applicant also organised a series of consultation events, located at accessible public locations, where a full copy of the PEIR was available for reference, as well as large scale maps with further details on the locations for attendees to view and discuss. Project 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.</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>USB sticks containing the PEIR, and printed copies of the PEIR NTS and the Consultation Brochure were available to take away.</p> <p>When the Applicant's application for a DCO was accepted the digital-first approach continued, with all documents available on the project's pages on the National Infrastructure Planning website. With the volume of the full suite of documents in the many thousands of pages, the Applicant's Section 56 notification offered assistance to anyone with accessing the documents relevant to them: "If you require an alternative method for inspection of the DCO application or have any queries, including how to access the documents on the Planning Inspectorate's website, please call the Applicant on 0800 860 6263 or email <a href="mailto:info@monaoffshorewind.com">info@monaoffshorewind.com</a>."</p> <p>Again, due to the volume of the full suite of documents, and with particular reference to the Applicant's commitment to the environment and sustainability, it was deemed reasonable to charge a fee for printed materials: "The Applicant can also provide any of the documents as required on a USB (free of charge). Hard copies of the NTS can also be provided upon reasonable request. Provision of hard copies of the ES will be subject to a maximum charge of £7,000, plus VAT, to cover printing and delivery costs."</p> <p>The Applicant considers its commitments to aiding people with the use of resources to be more than reasonable.</p> <p>The Applicant received requests for printed copies of all DCO application documents from the representative of the four named respondents. Following a discussion with said representative about the volume of documents that makes up the DCO application, the Applicant offered a view on which documents it thought would be of most relevance (Works Plan - Onshore, Land Plan, Statement of Reasons and the Site Selection BRAG chapter) and offered to send hard copies of these free of charge.</p> <p>The representative responded stating this "may be a sensible compromise" and requested that the Applicant initially forward a link to the pdf of the Statement of Reasons (APP-029) and a list of all the documents in the document library in pdf format for perusal. These links were shared, and at time of writing, no further response had been received.</p>
RR-056.28	<p>7.0 Conclusion</p> <p>7.1 The Promoter has not demonstrated that it has fully considered the impact that the Order and the use of this</p>	<p>The Applicant has demonstrated through the site selection and consideration of alternatives process (as outlined in Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) and supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>Land will have upon the landowners and its current and future plans.</p> <p>7.2 Any potential public benefit resulting from the use of all or part of this land does not outweigh the harm, which would be caused to the Objectors.</p> <p>7.3 It is clear that in choosing to locate the cables on the Objector's land then the Promoter has merely paid lip service to the Objector's issues and instead has ploughed on regardless not due to the "compelling case in the public interest" or "indispensable" nature of the land to the scheme but rather due to general and commercial convenience and desirability in furtherance of its private profit. Better alternative routes and solutions have been dismissed out of hand due to the Promoter's assumption that the draconian powers it seeks will be granted to it as a matter of course. This is unfair.</p>	<p>4.2: Site Selection BRAG Report annex (APP-082)) that a rigorous and robust process has been followed.</p> <p>Decisions made by the Applicant in response to consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible. If it has not been possible to avoid or reduce the impact on a particular landowner, then this has been because of the requirements for engineering feasibility or to avoid potential impacts associated with environmental constraints.</p> <p>The Applicant continues to seek voluntary agreement for the rights sought.</p>
RR-056.29	<p>7.4 The alternatives that are referred to in section 4.0 (to be evidenced further at Inquiry) would each enable the Objectors to withdraw these objections. The suggestions in Section 5.0 (to be evidenced further at Inquiry) would alleviate the strength of the Objectors' objections. Each alternative deserves a proper robust investigation and the Promoter put to strictly evidence why they have not considered them.</p> <p>7.5 The Objectors therefore request to have their objections treated as a Statutory Objections and be given the opportunity to air their views to the proposal at a Public Local Inquiry where the issues they raise can be given a fair hearing by the Inspector who will duly report to the Secretary of State having proper regard to the need to strike a fair balance between weighing up whether the public benefit is sufficiently significant to outweigh the damaging impact of the taking of interest this land or, on the other hand. whether the land's inclusion in the Order has merely been for the convenience of and desirability of the Promoter's return on investment.</p>	<p>The Applicant has considered each of the alternatives raised by the Objector within Section 4.6.2, Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051); supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082)).</p> <p>The Applicant notes the objection and welcomes the opportunity to discuss these matters further through the Examination process.</p> <p>The Applicant will continue to seek voluntary agreement for the rights sought.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-056.30	<p>Kindly keep us informed of progress with the DCO and the Public Inquiry process.</p> <p>Yours faithfully</p> <p>Mrs H M Parry</p> <p>Mr R W Parry</p> <p>Mr G W Parry</p> <p>Mrs E W Wade</p>	<p>Noted by the Applicant and we will continue to engage.</p>

## 2.57 National Grid

Table 2.57: RR-057 – National Grid

Reference	Relevant Representation Comment	Applicant's response
RR-057.1	<p>Relevant Representation of National Grid Electricity Transmission Plc in respect of the Mona Offshore Wind Farm Development Consent Order (the "Order") This relevant representation is submitted on behalf of National Grid Electricity Transmission Plc ("NGET") in respect of Mona Offshore Wind Limited's (the "Applicant") application for the Order which seeks powers to enable the construction of an offshore wind farm with an approximate capacity of 1500MW in the Irish Sea ("Project"), and in particular NGET's infrastructure and land which is within or in close proximity to the proposed limits of the Order ("Order Limits"). NGET will require appropriate protection for retained and future apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus. NGET's rights of access to inspect, maintain, renew and repair such apparatus must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGET's existing or future interests in land or apparatus, NGET will require appropriate protection and further discussion is required on the impact to its apparatus and rights.</p> <p>Existing NGET infrastructure within/in close proximity to the proposed Order Limits: NGET owns or operates the following infrastructure within or in close proximity to the proposed Order Limits for the Project. These assets form an essential part of the electricity transmission network in England and Wales. The details of the electricity assets are as follows: Substation: • Bodelwyddan 400kV Substation Associated overhead and underground apparatus including cables Overhead Lines: • 4ZB 400kV OHL Bodelwyddan - Deeside - Pentir 1 Bodelwyddan - Deeside - Pentir 2 • GM Route 400kV OHL Bodelwyddan - Deeside - Pentir 2 Associated cable fibre Cable Apparatus: • Pentre-Mawr</p>	<p>National Grid Electricity Transmission Plc's comments are noted.</p> <p>Detailed discussions regarding adequate protection of National Grid Electricity Transmission Plc's assets are ongoing.</p> <p>Information on interactions with the Mona Offshore Wind Project is being shared with National Grid Electricity Transmission Plc to facilitate the ongoing discussions and negotiations in relation to the protective provisions and, where necessary, any other agreements that may be required.</p> <p>The Applicant expects the relevant documentation will be agreed before the close of the Examination.</p>



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Reference	Relevant Representation Comment	Applicant's response
	<p>Cable Compound • Deeside - Pentir 1 Cable • Bodelwyddan 4 St Asaph 132kv Cable Sections 01 And 02</p> <p>Future NGET infrastructure within/in close proximity to the proposed Order Limits: The proposed Order Limits overlap with land required for the following future NGET infrastructure which are required for future generation connections (subject to obtaining the necessary consents and land rights):</p> <ul style="list-style-type: none"> <li>· The extension of the existing Bodelwyddan 400 kV substation (Substation Extension); and</li> <li>· Reconfiguration of the existing overhead line section 4ZB166-168 (OHL Works).</li> </ul> <p>The Substation Extension works and the footprint of the Substation Extension sit wholly within the red-line boundary of the Project which also overlaps with land required for the OHL Works. The draft Order includes powers for the Applicant to undertake electrical works to connect to the new Substation Extension (Work No. 26) and acquire new rights within plot 11-203 (being the location of the Substation Extension). The draft Order seeks powers for the Applicant within plots 11-197, 11,198, 11-199, 11-200, 11,206, 11-207, 11-208, 11-209, 11-210 and 11-211 to place permanent landscaping, ecological and environmental works, including watercourse realignment and attenuation pond(s); temporary construction compound and laydown area; and access during construction.</p> <p>NGET has engaged with the Applicant at the DCO pre-application stage and has submitted consultation responses to make it clear to the Applicant that the Applicant must have regard to the Substation Extension, OHL Works and enabling works in developing its scheme. NGET will require a form of protective provisions which includes protection in respect of Substation Extension and OHL Works and ensures that the Applicant is not permitted to carry out connection works within the Substation Extension area, OHL Works area or operational land without the agreement of NGET.</p> <p>In order to avoid serious detriment to NGET and its undertaking, the Applicant must not be granted powers of</p>	

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Reference	Relevant Representation Comment	Applicant's response
	<p>compulsory acquisition in respect of any land required for the Substation Extension or OHL Works.</p> <p>Protection of NGET Assets: As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such, NGET has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the draft Order Limits. As noted, NGET's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew, repair and refurbishment such apparatus located within or in close proximity to the Order Limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted. NGET will require protective provisions to be included within the Order for the Project to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. NGET is liaising with the Applicant in relation to such protective provisions, along with any supplementary agreements which may be required.</p> <p>NGET requests that the Applicant continues to engage with it to provide explanation and reassurances as to how the Applicant's works pursuant to the Order (if made) will ensure protection for those NGET assets which will remain in situ, along with facilitating all future access and other rights as are necessary to allow NGET to properly discharge its statutory obligations.</p> <p>NGET will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions.</p> <p>Compulsory Acquisition Powers in respect of the Project: The Applicant is seeking compulsory powers over a number of plots which include both existing and future NGET overhead line assets and/or interests. As noted, where the Applicant intends to acquire land or rights, or interfere with any of NGET's interests in land, NGET will require further discussion with the Applicant and NGET will require its</p>	

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Reference	Relevant Representation Comment	Applicant's response
	<p>standard Protective Provisions to be included within the Order.</p> <p>NGET reserves the right to make further representations as part of the Examination process in relation to specific interactions with its assets but in the meantime will continue to liaise with the Applicant with a view to reaching a satisfactory agreement.</p>	

## 2.58 NATS

**Table 2.58: RR-058 – NATS**

Reference	Relevant Representation Comment	Applicant's response
RR-058.1	The proposed development has been examined by our technical safeguarding teams and conflicts with our safeguarding criteria. Accordingly, NATS (En Route) plc objects to the proposal. The reasons for NATS's objection relate to the impact on the air traffic radars at Lowther, St Annes and Great Dun Fell.	The Applicant is working to facilitate co-existence with aviation receptors and minimise disruption as far as is practicably possible. Early engagement was established with NATS in 2021 and will continue throughout the examination phase of the project. Following our most recent meeting on 5 June 2024, NATS have issued the Applicant with a draft Mitigation and Service Contract, which is currently under review by the Applicant.

## 2.59 Neil Conway

Table 2.59: RR-059 – Neil Conway

Reference	Relevant Representation Comment	Applicant's response
RR-059.1	I believe for an economy dependent upon the tourist industry, it would be a retrograde step in doing anything to effect the viability of the area. Therefore I oppose this application	<p>The Applicant's environmental statement includes an assessment of the potential impact of the proposed development on socio-economics, including tourism, in Volume 4, Chapter 3: Socio-economics (APP-077).</p> <p>The assessment of potential impacts on tourism includes assessing the potential indirect impacts from the proposed development associated with visual amenity, overnight accommodation and recreation on tourism. The study area includes North Wales, North West England and the Isle of Man, and includes baseline information on the visitor economy in these regions.</p> <p>For each of the tourism study areas, North Wales, North West England and the Isle of Man, the assessment concludes that whilst the sensitivity of the receptors such as the tourism industry is high, the magnitude of impact is negligible, so any effect will be minor and will not impact on the viability of the tourism industry in the study areas.</p>

## 2.60 Network Rail Infrastructure Limited

Table 2.60: RR-060 – Network Rail Infrastructure Limited

Reference	Relevant Representation Comment	Applicant's response
RR-060.1	<p>This is the section 56 representation of Network Rail Infrastructure Limited (Network Rail) provided in respect of Mona Offshore Wind Limited's (Applicant's) application for a Development Consent Order (Order) to authorise the construction, maintenance and operation of an offshore wind generating station in the Irish Sea off the coast of North Wales with an electrical output capacity of over 350 MW (Scheme).</p> <p>Network Rail is a statutory undertaker and owns, operates and maintains the majority of the rail infrastructure of Great Britain. The Book of Reference (BoR) identifies 8 plots identifiable on Sheets 1 and 2 of the Land Plans as land that Network Rail owns or has an interest in. The compulsory acquisition powers sought in relation to 6 plots are described in the BoR as being temporary possession. The compulsory acquisition powers sought in relation to 2 plots are described in the BoR as being the permanent acquisition of rights (Compulsory Powers). Network Rail notes that the Compulsory Powers are sought in relation to operational railway land forming part of the operational railway north of the A55, Abergale (being the North Wales Coast Line (Railway Line)).</p> <p>The Applicant proposes to access land owned by Network Rail during construction of the Scheme and carry out the installation of cable circuits beneath the Railway Line. Network Rail objects to the inclusion of the Plots in the Order. The Plot constitutes land acquired by Network Rail for the purpose of its statutory undertaking and, accordingly, this representation is made under section 56 and sections 127 and 138 of the Planning Act 2008.</p> <p>Network Rail also objects to all other compulsory powers in the Order to the extent that they affect, and may be</p>	<p>Network Rail's comments are noted.</p> <p>Network Rail has confirmed to the Applicant that it will be represented by Eversheds Sutherland in ongoing detailed discussion regarding adequate protection of Network Rail's assets.</p> <p>Information on interactions with the Mona Offshore Wind Project is being shared with Network Rail to facilitate the ongoing discussions and to progress negotiations in relation to both the protective provisions and, where necessary, any relevant agreements with Network Rail.</p> <p>The Applicant expects the relevant documentation will be agreed before the close of the Examination.</p>

**MONA OFFSHORE WIND PROJECT**

Reference	Relevant Representation Comment	Applicant's response
	<p>exercised in relation to, Network Rail's property and interests.</p> <p>In order for Network Rail to be in a position to withdraw its objection Network Rail requires:</p> <p>(a) agreements with the Applicant that regulate:</p> <p>(i) the manner in which rights over the Plots and any other railway property are acquired and the relevant works are carried out including terms which protect Network Rail's statutory undertaking and agreement that compulsory acquisition powers will not be exercised in relation to such land; and</p> <p>(ii) the carrying out of works in the vicinity of the operational railway network to safeguard Network Rail's statutory undertaking;</p> <p>(b) the inclusion of protective provisions in the DCO for its benefit. Network Rail welcomes the fact that there are protective provisions for its benefit in the Order and, if necessary, will provide detailed comments on, and amendments to, the protective provisions when it submits its detailed Written Representation.</p> <p>To safeguard Network Rail's interests and the safety and integrity of the operational railway, Network Rail objects to the inclusion of the Compulsory Powers and any other powers affecting Network Rail in the Order. Network Rail requests that the Examining Authority treat Network Rail as an Interested Party for the purposes of the Examination.</p>	

## 2.61 Nigel Williams

Table 2.61: RR-061 – Nigel Williams

Reference	Relevant Representation Comment	Applicant's response
RR-061.1	I understand the planning application identifies a piece of our land as the proposed route for the cable to run and as such I want to be made aware of all future correspondence and likely impacts	This is noted by the Applicant and is aware of the interest. The Applicant will continue to engage and work with Nigel Williams and his appointed agent regarding the land rights being sought over the land within this ownership identified within the order limits.



## 2.62 Northern Ireland Fish Producers' Organisations

Table 2.62: RR-062 – Northern Ireland Fish Producers' Organisations

Reference	Relevant Representation Comment	Applicant's response
RR-062.1	I represent the significant proportions of the commercial fishing industry in Northern Ireland and West coast of England	<p>Noted. 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 to understand stakeholders' requirements for co-existence 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 (APP-199), which is secured through the deemed marine licence (Schedule 14 of the DCO, condition 18) and is expected to be secured in the separate marine licence. Mitigation and monitoring commitments are set out within the environmental statement chapters and the Mitigation and monitoring schedule (APP-196).</p> <p>Enabling co-existence and indeed, co-location was a key aim underpinning the Applicant's commitments to not close the entire development area during construction, the scallop mitigation zone (SMZ) and the orientation and spacing of infrastructure. Fishing receptor groups will be able to continue fishing within parts of the Mona Array Area and Mona Offshore Cable Corridor during construction. During the operations and maintenance phase, the measures adopted as part of the Mona Offshore Wind Project such as the SMZ, minimum infrastructure spacing of 1,400 m and roughly north-to-south alignment of wind turbine rows (as set out in APP-199), will provide the space for continued fishing within the Mona Array Area and the Mona Offshore Cable Corridor, and fishing vessels will be able to transit through these areas.</p>

## 2.63 Northern Ireland Fisherman’s Federation

Table 2.63: RR-063 – Northern Ireland Fisherman’s Federation

Reference	Relevant Representation Comment	Applicant’s response
RR-063.1	<p>Since 2017 I have managed fishing gear technology projects on behalf of both NI fish producer organisations. I work with members of both POs who operate out of the 3 main commercial fishing harbours situated on the County Down coast, Portavogie, Ardglass &amp; Kilkeel. As a fisheries scientist employed by the NI fishing industry I provide managers and operators with technical and scientific support on a range of relevant matters. My representation as part of this process will cover the provision of information on fishing activities relevant to the development in addition to scientific input on the implications of the Mona offshore windfarm site in relation to commercial species, habitats and general fishing operations.</p>	<p>Noted. 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 to understand stakeholders’ requirements for co-existence 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 (APP-199), which is secured through the deemed marine licence (Schedule 14 of the DCO, condition 18) and is expected to be secured in the separate marine licence. Mitigation and monitoring commitments are set out within the environmental statement chapters and the Mitigation and monitoring schedule (APP-196).</p> <p>Enabling co-existence and indeed, co-location was a key aim underpinning the Applicant’s commitments to not close the entire development area during construction, the scallop mitigation zone (SMZ) and the orientation and spacing of infrastructure. Fishing receptor groups will be able to continue fishing within parts of the Mona Array Area and Mona Offshore Cable Corridor during construction. During the operations and maintenance phase, the measures adopted as part of the Mona Offshore Wind Project such as the SMZ, minimum infrastructure spacing of 1,400 m and roughly north-to-south alignment of wind turbine rows (as set out in APP-199), will provide the space for continued fishing within the Mona Array Area and the Mona Offshore Cable Corridor, and fishing vessels will be able to transit through these areas.</p>

## 2.64 Paul Salt

Table 2.64: RR-064 – Paul Salt

Reference	Relevant Representation Comment	Applicant's response
RR-064.1	I am a neighbour to the project pathway and want to be kept updated on its progress	<p>To register your interest and be kept informed as the project progresses through the Development Consent Order process, you can sign up to receive updates from the Planning Inspectorate here:  <a href="https://infrastructure.planninginspectorate.gov.uk/projects/wales/mona-offshore-wind-farm/">https://infrastructure.planninginspectorate.gov.uk/projects/wales/mona-offshore-wind-farm/</a></p> <p>Alternatively, to register your interest with the Applicant, to receive project updates you can sign up here: <a href="https://www.morganandmona.com/en/contact/">https://www.morganandmona.com/en/contact/</a></p>

## 2.65 Philip Banfield

Table 2.65: RR-065 – Phil Banfield

Reference	Relevant Representation Comment	Applicant's response
RR-065.1	<p>This project crosses the sole access to our property. I am a hospital consultant and my wife is a GP, so we are liable to need to maintain 24/7 access to enable us to attend patients.</p>	<p>The Applicant welcomes the Representation and the additional information provided.</p> <p>The Mona Offshore Wind Project has committed to maintaining all public highway access throughout the construction phase. Information on how the onshore cable route will cross sections of public highway are detailed in Section 1.10 of the Outline Construction Traffic Management Plan (APP-225).</p> <p>Members of the public will retain right of way over public highway and access tracks (where required) during the hours of construction (0700 – 1900). All public highway and access tracks will remain open outside construction hours so that access will be maintained twenty-four hours a day, seven days a week.</p>

## 2.66 Prestatyn Town Council

Table 2.66: RR-066 – Prestatyn Town Council

Reference	Relevant Representation Comment	Applicant's response
RR-066.1	Representation of the views of and on behalf of Prestatyn Town Council and the public represented within Prestatyn.	The Applicant notes the representation.

## 2.67 Public Health Wales

Table 2.67: RR-067 – Public Health Wales

Reference	Relevant Representation Comment	Applicant's response
RR-067.1	As the national public health agency of Wales, Public Health Wales (PHW) would like to register as an interested party for this consultation. PHW wishes to have the opportunity to have sight of and be included in correspondence of further documentation submitted by the applicant and to comment on any potential impacts on public health.	<p>The Applicant notes this response.</p> <p>The Human Health chapter of the Environmental Statement (Document Reference F4.4, PINS APP-078) presents the assessment of the potential impact of the Mona Offshore Wind Project on Human Health. Specifically, considering the potential impact during the construction, operations and maintenance and decommissioning phases.</p>

## 2.68 Rebecca Face

Table 2.68: RR-068 – Rebecca Face

Reference	Relevant Representation Comment	Applicant's response
RR-068.1	<p>Submission for EN010137. My concerns are the abnormalities present in the application itself and the lack of accountability that will create, and the fundamental lack of detail and diligence centering around the TCC2 area. The TCC2 area is a key juncture for the project and yet the information about the corridor, cable route, proposed new road layout are incoherent and impossible to achieve given the physical nature of the area. This will lead to serious cumulative effects for wildlife, habitats, marshland, watercourses, the local economy, flooding and serious impacts on road safety. It would be beneficial to hold open floor hearings, hearings about specific issues and compulsory acquisition hearings.</p>	<p>The Applicant supports the use of open floor hearings, issue specific hearings and compulsory acquisition hearings to examine the Mona DCO application.</p> <p>The road layout at Temporary Construction Compound 2 (TCC2) area is explained in detail in the Outline Highways Access Management Plan (APP-228).</p> <p>TCC 2 access is proposed to be located along the B5381 Roman Road west of the Penrefail crossroads with the A548. The location of TCC 2 is approximately 60 m to the west of the A548 allowing for safe separation.</p> <p>A preliminary access design and swept path analysis of a maximum length articulated vehicle have been completed and are presented by drawing JNY11256-14 in Appendix D of the Outline Highways Access Management Plan.</p> <p>Potential impacts associated with watercourses and flooding around the TCC2 area are considered within Section 2.7.2 of Volume 3, Chapter 2: Hydrology and Flood Risk (APP-065). No significant adverse impacts are identified during the construction phase.</p> <p>Potential impacts associated with wildlife, habitat and marshland around the TCC2 area are considered within Section 3.9 of Volume 3, Chapter 3: Onshore Ecology (APP-066). No significant adverse impacts are identified during the construction phase (or other phases of the project).</p> <p>Potential impacts associated with road safety around the TCC2 area are considered within Section 8.9.7 of Volume 3, Chapter 8: Traffic and Transport (APP-071). No significant adverse impacts are identified during the construction phase.</p> <p>Potential impacts associated with effects to the local economy are considered within Volume 4, Chapter 3: Socio-economics (APP-077). No significant adverse impacts are identified during the construction phase.</p>

**MONA OFFSHORE WIND PROJECT**
**2.69 Robert Parry**
**Table 2.69: RR-069 – Robert Parry**

Reference	Relevant Representation Comment	Applicant's response
RR-069.1	I am one of the owners of plots 06-101, 06-102, 06-103, 06-104, 06-105 and wish to object to the proposed cable route on the following non exhaustive grounds: The Promoter has failed to consider all reasonable options for power transmittal methods – Evidence will be adduced at Inquiry for this.	<p>The Applicant has undertaken a rigorous and robust site selection process in relation to the onshore cable route for the Mona Offshore Wind Project.</p> <p>A full reasoning and justification for the selection of the onshore cable route is provided in Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). This is also supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p>
RR-069.2	The Promoter has failed to consider all reasonable route options that would score equally well in its BRAG report – Evidence will be adduced at Inquiry for this.	<p>The optimum route for an onshore grid connection is generally considered to be the shortest route from A to B from landfall to Bodelwyddan National Grid Substation. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore cable route.</p>
RR-069.3	The Promoter has failed to consider a combination of different power transmittal methods and reasonable route options that would score equally well in its BRAG report – Evidence will be adduced at Inquiry for this.	<p>Decisions made by the Applicant in response to landowner and consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible.</p> <p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons. This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
RR-069.4	The current power transmittal proposals will not cater for the full generation capacity of Mona Offshore Windfarm leading to a bottleneck in the power supply. This also curtails the capacity for future upgrades. This would not be the case in the event of different transmittal methods and better route	<p>The Applicant can confirm that the base case design constitutes 4 circuits of 220kv cables, with each circuit having the transmittal capacity of circa 375MW. These details are confirmed in Section 3.7.2 of Volume 1, Chapter 3: Project Description (APP-050). On this basis, there will be sufficient transmittal capacity for the Mona Offshore Wind Project.</p>



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Reference	Relevant Representation Comment	Applicant's response
	selection or a combination of both – Evidence will be adduced at Inquiry for this.	
RR-069.5	Locally the land take is extremely excessive and this could be significantly reduced by different transmittal methods and better route selection or a combination of both – Evidence will be adduced at Inquiry for this.	<p>The Applicant has undertaken a rigorous and robust site selection process in relation to the onshore cable route for the Mona Offshore Wind Project.</p> <p>A full reasoning and justification for the selection of the onshore cable route is provided in Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). This is also supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p> <p>The optimum route for an onshore grid connection is generally considered to be the shortest route from A to B from landfall to Bodelwyddan National Grid Substation. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore cable route.</p> <p>Decisions made by the Applicant in response to consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible.</p> <p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons. This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
RR-069.6	The land has special value to us and future proposals over other land locally and cannot be replaced – Evidence will be adduced at Inquiry for this.	The principle point of land value is not a matter for the examination and will be addressed through negotiations. However, the point is noted and the Applicant looks forward to receiving evidence testing to the value suggested through voluntary negotiations.
RR-069.7	Requests to consider alternative arrangements have been brushed aside with little or no consideration by the Promoter.	Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were

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Reference	Relevant Representation Comment	Applicant's response
	<p>There is little or no regard for the impacts on us which is very unfair – Evidence will be adduced at Inquiry for this.</p>	<p>discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons. This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p> <p>In addition to the strategic-level decision making, a preliminary Engineering feasibility assessment undertaken to define the scope of the Mona Offshore Wind Project stipulated that underground cables are less affected by weather conditions, offer higher reliability and security than overhead cables, are less prone to interference from external factors, reduce the risk of electrocution or injury to people or animals, are less prone to explosion or fire, and are easier to maintain.</p> <p>The Applicant carried out a statutory consultation in 2023; this is a key part of the planning process, which the Applicant undertook in order to understand community views. The Applicant submitted a Consultation Report (APP-037) with its DCO application that explained 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.</p> <p>The Applicant will continue to engage with Robert Parry throughout the Examination process and is keen to understand any further information that can be provided.</p>
RR-069.8	<p>The scheme, certainly to the extent that our land is concerned, has been designed for the convenience of the Promoter and also minimising their costs in order to maximise their return on investment rather than on the basis of there being a compelling case in the public interest overriding the harm done to us as the impacted landowners – Evidence will be adduced at Inquiry for this.</p>	<p>The land take proposed for the scheme is proportionate to the works required and applicant will seek to minimise land take through construction where possible. Heads of terms which include consideration for the rights sought and disturbance caused have been issued and are being negotiated.</p> <p>The Statement of Reasons (APP-029) sets out the Applicant's justification for seeking powers of compulsory acquisition, and that a compelling case exists in the public interest which justifies the making of the DCO with those powers.</p>
RR-069.9	<p>In addition to consultation failings and lack of any meaningful sincere engagement beyond the minimum necessary lip service believed to be necessary to secure these draconian CPO powers, the Promoter has sought to discourage and disincentivise proper debate at Public Inquiry by declining to produce hard copies of the documents to statutory objectors. As can be seen from the DCO notice received on 26 March 2024 they will charge up to £7,000 to provide hard copies of their reports and</p>	<p>The Applicant is a responsible developer committed to listening to the views of stakeholders including landowners and members of the local community. Statutory consultation is a key part of the planning process, one which the applicant took seriously; a Consultation Report was submitted with the DCO application (APP-037) explaining how the Applicant complied with the pre-application consultation requirements set down in the Planning Act 2008 and had regard to all the feedback submitted.</p> <p>From the outset, the Applicant promoted a digital-first consultation and designed a project website that is easily accessible to a wide range of users. That said, the</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>documents. One of the co-owners, my mother is in their late 80's unable to drive and with vision difficulties and unable to read a computer screen and yet the Promoter expects her to travel to either Llandudno or Rhyl in order to inspect hard copies of the document as the Promoter's charges for them are simply prohibitive.</p>	<p>Applicant consulted using a variety of methods to help explain the proposals and encourage people to provide their comments. Community focused materials included a consultation postcard, website, brochure and a non-technical summary of the PEIR (PEIR NTS). The Applicant also organised a series of consultation events, located at accessible public locations, where a full copy of the PEIR was available for reference, as well as large scale maps with further details on the locations for attendees to view and discuss. Project 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.</p> <p>When the Applicant's application for a DCO was accepted the digital-first approach continued, with all documents available on the project's pages on the National Infrastructure Planning website. With the volume of the full suite of documents in the many thousands of pages, the Applicant's Section 56 notification offered assistance to anyone with accessing the documents relevant to them: "If you require an alternative method for inspection of the DCO application or have any queries, including how to access the documents on the Planning Inspectorate's website, please call the Applicant on 0800 860 6263 or email <a href="mailto:info@monaoffshorewind.com">info@monaoffshorewind.com</a>."</p> <p>Again, due to the volume of the full suite of documents, and with particular reference to the Applicant's commitment to the environment and sustainability, it was deemed reasonable to charge a fee for printed materials: "The Applicant can also provide any of the documents as required on a USB (free of charge). Hard copies of the NTS can also be provided upon reasonable request. Provision of hard copies of the ES will be subject to a maximum charge of £7,000, plus VAT, to cover printing and delivery costs." The Applicant considers its commitments to aiding people with the use of resources to be more than reasonable.</p> <p>The Applicant received requests for printed copies of all DCO application documents from the representative of the four named respondents. Following a discussion with said representative about the volume of documents that makes up the DCO application, the Applicant offered a view on which documents it thought would be of most relevance (works plans, land plans, statement of reasons and site selection BRAG) and offered to send hard copies of these free of charge.</p> <p>The representative responded stating this "may be a sensible compromise" and requested that the Applicant initially forward a link to the pdf of the statement of reasons and a list of all the documents in the document library in pdf format for</p>

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Reference	Relevant Representation Comment	Applicant's response
		consideration. These links were shared, and at time of writing, no further response had been received.
RR-069.10	In addition to the above summary please see formal letter of objection dated 3rd May 2024 submitted by post and email to the planning inspectorate and National Infrastructure Commission. We look forward to explaining the above issues in detail to the inspector at the Inquiry	This is noted by the Applicant. The Applicant welcomes discussion on detailed points through negotiations of the heads of terms.
RR-069.11	Dear Sirs We have been notified that MONA OFFSHORE WIND LTD ("Promoter") has made the above application for Compulsory Purchase Powers and we wish to object to the confirmation of this order as submitted on the following non exhaustive grounds:	This is noted by the Applicant and heads of terms for a voluntary agreement have been issued and we look forward to progressing negotiations of those.
RR-069.12	<p>1.0 Introduction and background</p> <p>1.1 We are Harriett Mary Parry, Robert Wynne Parry, Griffith Wayne Parry, and Elizabeth Wynne Wade ("Objectors") being the joint owners of land ("Property") affected by this Development Consent Order ("DCO").</p> <p>1.2 The Property is identified as Plots 06-101, 06-102, 06-103, 06-104c, 06-105 in the Book of Reference and on the Mona Land Plan.</p> <p>1.3 In line with current government policy although entirely for private profit, the Promoter is proposing to construct scheme to build an offshore wind farm comprising of up to 96 wind turbines within an area of circa 300 square KM offshore from Abergele in North Wales.</p> <p>1.4 Whilst estimates vary according to source and the dates, the Promoter claims that the scheme will generate up to 1.5 Gigawatts of electrical power and this power is intended to be transmitted from its point of landfall between Llandulas and Abergele and then by underground cables to a substation at Bodelwyddan behind St Asaph Business Park.</p> <p>1.5 Notwithstanding that this is a scheme for private commercial profit, the Promoter has sought to use statutory public DCO powers under Section 56 of the Planning Act</p>	The Applicant notes the points raised.

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Reference	Relevant Representation Comment	Applicant's response
	<p>2008 to assemble the land that it considers necessary to accommodate its scheme.</p> <p>1.6 The relevant notification of making of the CPO issued by the Acquiring Authority and received by the Objectors is dated 26th March and specifies that Objections must be made 'by 6th May 2024'.</p> <p>1.7 The Objectors are a "qualifying person" within the meaning of s.12(2) of the Acquisition of Land Act 1981 and are therefore statutory objectors.</p> <p>1.8 The Objectors are also "Affected Persons" for the purposes of Section 59 and 92 of the Planning Act 2008.</p> <p>1.9 Whilst the Objectors' points of objection are the same and hence are recorded in this single letter of objection, there are in fact 4 separate individual parties objecting here and they should be treated individually as Objectors in their own right.</p>	
RR-069.13	<p>1.10 Section 122 of the Planning Act 2008 states:-            "122 Purpose for which compulsory acquisition may be authorised</p> <p>(1) An order granting development consent may include provision authorising the compulsory acquisition of land only if the [Secretary of State] is satisfied that the conditions in subsections (2) and (3) are met.</p> <p>(2) The condition is that the land -</p> <p>(a) is required for the development to which the development consent relates,</p> <p>(b) is required to facilitate or is incidental to that development, or</p> <p>(c) is replacement land which is to be given in exchanged for the order land under section 131 or 132.</p> <p>(3) The condition is that there is a compelling case in the public interest for the land to be acquired compulsorily." (emphasis added)</p>	<p>This is noted and welcomed by the Applicant.</p> <p>The Applicant can confirm that the Mona Offshore Wind Project understands the requirements for which compulsory acquisition may be authorised.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-069.14	<p>1.11 Lord Justice McGowan noted in Sharkey V Buckinghamshire District Council that "required" in 2) a) of Section 122 of the Planning Act 2008 does not mean that the land in question has to be "indispensable" however it does not mean that the land is merely "desirable" or "convenient" for the purposes of the scheme either.</p> <p>1.12 It should be further noted that confirmation of the Order also depends on meeting the test that there is a compelling case in the public interest for the land to be acquired compulsorily in Section 3) of the 122 of the Planning Act 2008.</p> <p>1.13 Section 13 of the "Guidance on Compulsory purchase process and The Crichel Down Rules" produced by the Department for Levelling Up, Housing and Communities July 2019 states:"13. How will the confirming minister consider the acquiring authority's justification for a compulsory purchase order? The minister confirming the order has to be able to take a balanced view between the intentions of the acquiring authority and the concerns of those with an interest in the land that it is proposing to acquire compulsorily and the wider public interest. (emphasis added) Section 18 of the Memorandum to Circular 06/04 ends with :..... Parliament has always taken the view that land should only be taken compulsorily where there is clear evidence that the public benefit will outweigh the private loss. The Human Rights Act reinforces that basic requirement. (emphasis added)</p>	<p>This is noted and welcomed by the Applicant.</p> <p>The Applicant can confirm that the Mona Offshore Wind Project understands the requirements for which compulsory acquisition may be authorised.</p>
RR-069.15	<p>1.14 Evidence will be adduced to demonstrate that much of the design of the scheme, certainly to the extent that it impacts on landowners and certainly the Objectors and the Property, has been developed for general and commercial convenience to the Promoter and infurtherance of its private profit rather than from the view that there is a compelling case in the public interest that outweighs the harm done. In its commercial pursuit, the Promoter has failed to take proper account of representations from the Objectors which is unfair.</p>	<p>The Applicant has undertaken a rigorous and robust site selection process in relation to the onshore cable route for the Mona Offshore Wind Project.</p> <p>A full reasoning and justification for the selection of the onshore cable route is provided in Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). This is also supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p> <p>The optimum route for an onshore grid connection is generally considered to be the shortest route from A to B from landfall to Bodelwyddan National Grid</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-069.16	<p>1.15 In addition to the above the Objectors wish to object to the Order on the following non exhaustive grounds:</p> <p>2.0 The Onshore Power Transmittal Route Generally</p> <p>2.1 The applicant has not demonstrated that the route proposed is the most appropriate route for the scheme. The Power Transmittal Route seeks to terminate at a substation at Bodelwyddan which, as the crow flies, is some 10KM from where the cable breaks land. The route selection report purports to have carried out a Brown Red Amber Green ("BRAG") report to show that the 14.75KM route selected is optimum. However at least 4 alternative routes have been identified and evidence will be adduced to demonstrate how they are at least equivalent to and often superior to the selected route in terms of the BRAG report and general common sense.</p>	<p>Substation. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore cable route.</p> <p>Decisions made by the Applicant in response to consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible.</p> <p>The Statement of Reasons (APP-029) sets out the Applicant's justification for seeking powers of compulsory acquisition, and that a compelling case exists in the public interest which justifies the making of the DCO with those powers.</p>
RR-069.17	<p>3.0 General Disruption During Construction</p> <p>3.1 The implementation of the scheme on shore will be extremely disruptive both on private land and to the wider public for instance by it causing widespread disruption to traffic flows and the public highway generally and thereby to statutory and essential services to locals and visitors including tourists. This will be to the detriment of local, businesses, residents and visitors alike. It is also likely to cause noise, dust, vibration, fumes and other disturbances generally which are a concern. The Promoter has failed to evidence that these have been given proper consideration when developing its scheme.</p>	<p>The Applicant has considered potential impacts associated with traffic and transport, noise and vibration, air quality and socio-economics as part of the project development and has assessed each topic in the Environmental Statement.</p> <p>Potential impacts associated with widespread disruption to traffic flows and the public highway generally are considered within Volume 3, Chapter 8: Traffic and Transport (APP-071). No significant adverse impacts are identified during the construction phase.</p> <p>Potential impacts associated with noise and vibration are considered within Volume 3, Chapter 9: Noise and Vibration (APP-072). No significant adverse impacts are identified during the construction phase.</p> <p>Potential impacts associated with dust and fumes are considered within Volume 3, Chapter 10: Air Quality (APP-073). No significant adverse impacts are identified during the construction phase.</p> <p>Potential impacts associated with widespread disruption to locals and visitors including tourists are considered within Volume 4, Chapter 3: Socio-economics (APP-077). No significant adverse impacts are identified during the construction phase.</p>
RR-069.18	<p>4.0 The Onshore Power Transmittal Methodology</p> <p>4.1 Pylons</p>	<p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>4.1.1 The Promoter has dismissed pylons as a means of power transmittal simply on the grounds of "aesthetics" without adequate or indeed any consideration of other factors and advantages. Neither has the Promoter considered the use of existing pylons already in situ. The Promoter has also failed to consider a proposal whereby power transmittal could be partly by pylon and partly by underground cable. Evidence will be adduced to demonstrate how adopting a more open minded approach to these methodologies achieves a considerably better solution for all parties, including the Promoter, rather than the one currently proposed which is instead driven by Promoter convenience and maximizing rates of return.</p>	<p>considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
RR-069.19	<p>Underground Cables</p> <p>4.2.1 The Promoter's preference is for underground cables through previously undisturbed virgin lands largely within Conwy Council's "Special Landscaped Area".</p>	<p>The Applicant notes the concern regarding the locally designated Special Landscape Areas (SLAs). An assessment of effects on the special characteristics of the local landscape designations – Rhyd y Foel to Abergele SLA and Elwy and Aled Valleys SLAs – is contained within Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p> <p>The potential impact is assessed as a moderate adverse effect, which is considered not significant in EIA terms.</p>
RR-069.20	<p>4.2.2 However, due to issues with cables heating then the Promoter is limited in the capacity of cable that can be deployed underground thereby necessitating 4 cables which, the Objector is told will sterilize a 30Metre strip of their Property. Cables on pylons are open to the environment and the benefits of air cooling and so can carry a much higher capacity and so less cables and consequently, less easement width would be needed. The scale of the powers sought therefore go beyond that which is reasonably required to achieve the implementation of the Scheme.</p>	<p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
RR-069.21	<p>4.2.3 The Promoter claims that 1.5Gigawatts of electricity will be generated and this will require a transmittal cable capacity of 1.5MVA. They advise that this will be accommodated in 4 cables with considerable distances between them so that a large area of 30 metres in width is required for an easement and is land which will be sterilized by the scheme. However, the Statement of Reasons advises</p>	<p>Please see above Relevant Representation Response regarding the Mona Offshore Wind Project Transmittal Capacity (RR-069.4), Site Selection &amp; Consideration of Alternatives and Engineering Feasibility Assessment (RR-069.1-3) aspects for the detailed responses.</p>



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Reference	Relevant Representation Comment	Applicant's response
	<p>that a capacity of only up to 225- 275KVA will be provided for each of the 4 cables thereby only giving transmittal power of 1 M KVA or 1 GigaWatt. Underground cabling will therefore be a bottleneck in the amount of power that the current scheme can produce as well as stymie future upgrades which could easily be overcome had the Promoter considered an above ground pylon scheme.</p>	
RR-069.22	<p>4.2.4 Evidence will be adduced that effective alternative arrangements could be installed with the cables that can assist with for instance, venting and cooling, but other issues as well and increase the capacity of the cable runs that are there and again reduce the need for this excessive width of easement and consequent and unnecessary sterilization of the land.</p>	<p>Table 4.8 within Section 4.6.2 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines that overhead lines were considered by the Mona Offshore Wind Project as reasonable spatial and geographical alternatives to buried onshore cables. Overhead lines were discounted to reduce associated potential environmental effects, primarily associated with the long-term visual impact associated with large-scale pylons. This is detailed as a primary measure to reduce potential for impacts on landscape and visual resources in Table 6.20 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).</p>
RR-069.23	<p>5.0 The Onshore Route Selection Locally and Impact on Objector</p> <p>5.1 Locally the cable travels from a North Westerly direction towards the A548 but crosses the B5381 into plot 06-100 in a gradual sweeping arc over the A548 and into the objector's land. Unnecessarily, the entirety of the Objector's frontage to the A548 (almost 290 meters) is within the Limits of Deviation and a similar amount to the frontage of plot 06-100. The cables splay out to take this 90 degree bend as slowly and gradually as they possibly can. However this is not a water or sewerage pipe or high pressure hydrocarbon or gas or some other hazardous liquid transmitted under pressure necessitating a gradual circumference. It is understood that electricity is quite able to endure sharp 90 degree turns and bends which would greatly lessen the impact in terms of amount of land affected on the objector's plots as well as on the neighbouring plots 06-100. A request to look into and amend this issue has been ignored by the promoter.</p>	<p>The Applicant has considered a number of factors when proposing the alignment (and therefore the potential land take) of the onshore cable route, as detailed in Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p> <p>The alignment of the proposed onshore cable route, where it passes under the A548 near the Objector's land, is not dictated by the cable design but by several other factors. The primary factor being the proposed trenchless crossing approach for road and utility crossings adopted by the Mona Offshore Wind Project. Trenchless drilling allows the Applicant to place a conduit under the roads in which a cable is then installed, without having to close them or place any constraint on the traffic flows during their installation. Trenchless drilling techniques have limits on the minimum radius that conduits can be installed and are constrained by ground conditions, conduit sizing and materials, and restrictions placed by third parties. As the power cables also have to be pulled into the conduit, the pulling tensions on the cables also need to be considered, so although cables can be laid to reasonably tight radii, they cannot be pulled through conduits with the same radii without putting excessive tension on the cables and causing damage.</p> <p>It is not the cable design that dictates the onshore cable route alignment across the A548 but the engineering design along with land and consent-based constraints.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-069.24	<p>5.2 The Objectors land has a special value to them arising from the unique potential not present or available to the parcels on the other 3 quadrants of Pen Yr Efail Crossroads.</p> <p>In an attempt to preserve that position a request was made that the Promoter positioned the cables so that they travelled slightly further to the south along plot 06-100 (the owner of which is understood to be in advanced discussions with the Promoter towards accepting the cables) and crossed to the south of Property and to the south of the pylons already in place there before resuming the route to the far south of the Objector's Property beyond the land already sterilised by the existing pylons. The response obtained on 11 /09/23 via the Promoter's agent's was: "that to go to the south of the line, we would need to cross an additional road and then be running parallel between the pylon route in your land and the one just to the south, which again would be very limiting." This demonstrates how the Promoter is aware of alternative arrangements but has not been prepared to consider them preferring to dismiss them out of hand merely due to their being slightly more commodious to itself. It has instead selected the Objector's property for convenience as well as commercial reasons rather than for compelling reasons in the public interest which outweigh the loss suffered by the affected party to whom no regard has been given.</p>	<p>The principle point of land value is not a matter for the Examination and will be addressed through direct negotiations. However, the point is noted, and the Applicant looks forward to receiving evidence testing to the value suggested through voluntary negotiations.</p> <p>As detailed in Response to Relevant Representation RR-069.23 "The Applicant has considered a number of factors when proposing the alignment (and therefore the potential land take) of the onshore cable route, as detailed in Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082)". Engineering constraints based on moving the route to the south of the northern set of pylons include:</p> <ul style="list-style-type: none"> <li>• Additional land requirements to the west of the A548 to accommodate the trenchless technique under the road. Moving the crossing point south also makes the angle for crossing the road more acute which will reduce engineering feasibility of the trenchless technique at this location and also increases the pulling tension on the cables due to a tighter horizontal radius which increases the risk of damaging cables during installation.</li> <li>• Moving the proposed Order Limits south at the crossroad would create road safety issues off the A548 into the compound due to the road alignment and the junction to the south.</li> <li>• From an electrical perspective, running the cable circuits between two parallel overhead lines is not advisable due to the potential of induced currents. The Applicant is also limited by the working areas for both lines identified in the protective provisions, so the net corridor width is not sufficient for construction purposes.</li> <li>• The design philosophy and industry practice are to cross exiting utilities at a perpendicular angle, the alignment chosen enables the Applicant to do this. If The Objectors proposed route was utilised, between the pylons there are additional existing utilities that would either have to be crossed at an acute angle or diverted to facilitate our works.</li> </ul> <p>If it has not been possible to avoid or reduce the impact on a particular landowner, then this has been because of the requirements for Engineering feasibility or to avoid potential impacts associated with environmental constraints, as demonstrated above.</p>
RR-069.25	<p>5.3 Insufficient evidence has been provided to demonstrate that this project will secure the most efficient and effective use of the Property which is unique in planning and amenity</p>	<p>The Applicant disagrees that insufficient evidence has been provided. A full explanation of the site selection and consideration of alternatives process is detailed within Volume 1, Chapter 4: Site Selection and Consideration of</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>terms enabling it to be deployed for a number of alternative options and uses not available to adjacent and neighbouring land. This will be to the detriment of the local community and economy.</p>	<p>Alternatives (APP-051). The Applicant will continue to work with the landowner regarding potential opportunities associated with the Property and looks forward to receiving evidence testing to the value suggested through voluntary negotiations.</p>
RR-069.26	<p>5.4 The Order, if confirmed, will sterilize not only the excessive route of the cable but also</p> <p>render the retained land sterile by virtue of the fact that it will be unfeasible to develop in isolation. This would not be the case if the transmittal route or methodology selected was different or in fact that requested small local changes had been taken seriously and accommodated.</p>	<p>The Applicant has sought to micro site the route where possible to accommodate landowner requests and has considered a number of factors when proposing the alignment (and therefore the potential land take) of the onshore cable route, as detailed within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051).</p> <p>However, due to several environmental constraints as listed above in the detailed response to RR-069.24, the following points can also be noted:</p> <ul style="list-style-type: none"> <li>• There are additional land requirements at the crossing to facilitate the trenchless technique design and to accommodate the proposed temporary construction compounds.</li> <li>• Regarding land sterilisation, the easement area will have limitations on what can be accommodated in the future, however development losses which can be evidenced as a direct result of the project, can be compensated for.</li> </ul>
RR-069.27	<p>6.0 Consultation</p> <p>6.1 In addition to the evidence of poor consultation and lack of any meaningful engagement beyond the minimum necessary lip service believed to be necessary to secure these draconian powers, the Promoter has sought to discourage and disincentivise proper debate at Public Inquiry by declining to produce hard copies of the documents to statutory objectors. The DCO notice received on 26 March 2024 advised as follows: "Provision of hard copies of the ES will be subject to a maximum charge of £7,000, plus VAT, to cover printing and delivery costs." One of the Objectors is in their late 80's unable to drive and with vision difficulties and unable to read a computer screen and yet the Promoter expects her to travel to either Llandudno or Rhyl in order to inspect hard copies of the document as the Promoter's charges for them are simply prohibitive.</p>	<p>The Applicant is a responsible developer committed to listening to the views of stakeholders including landowners and members of the local community. Statutory consultation is a key part of the planning process, one which the Applicant took seriously; a Consultation Report was submitted with the DCO application (APP-037) explaining how the Applicant complied with the pre-application consultation requirements set down in the Planning Act 2008 and had regard to all the feedback submitted.</p> <p>From the outset, the Applicant promoted a digital-first consultation and designed a project website that is easily accessible to a wide range of users. That said, the Applicant consulted using a variety of methods to help explain the proposals and encourage people to provide their comments. Community focused materials included a consultation postcard, website, brochure and a non-technical summary of the PEIR (PEIR NTS). The Applicant also organised a series of consultation events, located at accessible public locations, where a full copy of the PEIR was available for reference, as well as large scale maps with further details on the locations for attendees to view and discuss. Project 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.</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>USB sticks containing the PEIR, and printed copies of the PEIR NTS and the Consultation Brochure were available to take away.</p> <p>When the Applicant's application for a DCO was accepted the digital-first approach continued, with all documents available on the project's pages on the National Infrastructure Planning website. With the volume of the full suite of documents in the many thousands of pages, the Applicant's Section 56 notification offered assistance to anyone with accessing the documents relevant to them: "If you require an alternative method for inspection of the DCO application or have any queries, including how to access the documents on the Planning Inspectorate's website, please call the Applicant on 0800 860 6263 or email <a href="mailto:info@monaoffshorewind.com">info@monaoffshorewind.com</a>."</p> <p>Again, due to the volume of the full suite of documents, and with particular reference to the Applicant's commitment to the environment and sustainability, it was deemed reasonable to charge a fee for printed materials: "The Applicant can also provide any of the documents as required on a USB (free of charge). Hard copies of the NTS can also be provided upon reasonable request. Provision of hard copies of the ES will be subject to a maximum charge of £7,000, plus VAT, to cover printing and delivery costs."</p> <p>The Applicant considers its commitments to aiding people with the use of resources to be more than reasonable.</p> <p>The Applicant received requests for printed copies of all DCO application documents from the representative of the four named respondents. Following a discussion with said representative about the volume of documents that makes up the DCO application, the Applicant offered a view on which documents it thought would be of most relevance (Works Plan - Onshore, Land Plan, Statement of Reasons and the Site Selection BRAG chapter) and offered to send hard copies of these free of charge.</p> <p>The representative responded stating this "may be a sensible compromise" and requested that the Applicant initially forward a link to the pdf of the Statement of Reasons (APP-029) and a list of all the documents in the document library in pdf format for perusal. These links were shared, and at time of writing, no further response had been received.</p>
RR-069.28	<p>7.0 Conclusion</p> <p>7.1 The Promoter has not demonstrated that it has fully considered the impact that the Order and the use of this</p>	<p>The Applicant has demonstrated through the site selection and consideration of alternatives process (as outlined in Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) and supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>Land will have upon the landowners and its current and future plans.</p> <p>7.2 Any potential public benefit resulting from the use of all or part of this land does not outweigh the harm, which would be caused to the Objectors.</p> <p>7.3 It is clear that in choosing to locate the cables on the Objector's land then the Promoter has merely paid lip service to the Objector's issues and instead has ploughed on regardless not due to the "compelling case in the public interest" or "indispensable" nature of the land to the scheme but rather due to general and commercial convenience and desirability in furtherance of its private profit. Better alternative routes and solutions have been dismissed out of hand due to the Promoter's assumption that the draconian powers it seeks will be granted to it as a matter of course. This is unfair.</p>	<p>4.2: Site Selection BRAG Report annex (APP-082)) that a rigorous and robust process has been followed.</p> <p>Decisions made by the Applicant in response to consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible. If it has not been possible to avoid or reduce the impact on a particular landowner, then this has been because of the requirements for engineering feasibility or to avoid potential impacts associated with environmental constraints.</p> <p>The Applicant continues to seek voluntary agreement for the rights sought.</p>
RR-069.29	<p>7.4 The alternatives that are referred to in section 4.0 (to be evidenced further at Inquiry) would each enable the Objectors to withdraw these objections. The suggestions in Section 5.0 (to be evidenced further at Inquiry) would alleviate the strength of the Objectors' objections. Each alternative deserves a proper robust investigation and the Promoter put to strictly evidence why they have not considered them.</p> <p>7.5 The Objectors therefore request to have their objections treated as a Statutory Objections and be given the opportunity to air their views to the proposal at a Public Local Inquiry where the issues they raise can be given a fair hearing by the Inspector who will duly report to the Secretary of State having proper regard to the need to strike a fair balance between weighing up whether the public benefit is sufficiently significant to outweigh the damaging impact of the taking of interest this land or, on the other hand, whether the land's inclusion in the Order has merely been for the convenience of and desirability of the Promoter's return on investment.</p>	<p>The Applicant has considered each of the alternatives raised by the Objector within Section 4.6.2, Section 4.9.5, Section 4.10.5 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051); supported by Section 1.3.3 and Section 1.4.3 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082)).</p> <p>The Applicant notes the objection and welcomes the opportunity to discuss these matters further through the Examination process.</p> <p>The Applicant will continue to seek voluntary agreement for the rights sought.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-069.30	Kindly keep us informed of progress with the DCO and the Public Inquiry process. Yours faithfully Mrs H M Parry Mr R W Parry Mr G W Parry Mrs E W Wade	Noted by the Applicant and we will continue to engage.

## 2.70 Royal Commission Ancient and Historical Monuments of Wales

Table 2.70: RR-070 – Royal Commission Ancient and Historical Monuments of Wales

Reference	Relevant Representation Comment	Applicant's response
RR-070.1	<p>The RCAHMMW is a statutory consultee for marine licensing in Wales, and as such has an interest and role to play in the PINS process and associated Welsh Marine License. We have been consulted on the MONA project from its inception and are happy to say that our views have been noted on and acted on with regard to potential impact of the project on marine archaeology. As such, we are content that the ES and supporting technical documentation is suitable to take forward, and would note that it represents an enhancement of our knowledge of a number of marine archaeological sites in the offshore zone of the scheme. We also note the commitment by the project to archive archaeologically relevant data within the National Monuments Record of Wales, to ensure future site monitoring can always be conducted. We would note that the ES makes reference to a draft WSI and PAD as being appended to the Offshore Archaeology Technical Report, but we could not locate either of these two documents. They will be needed for the marine license phase of the scheme.</p>	<p>The Applicant notes that the RCAHMMW is satisfied with the approach the Applicant has taken to consultation and the enhancement of knowledge for a number of marine archaeological sites in and around the Mona Array Area and Mona Offshore Cable Corridor.</p> <p>For both the onshore and offshore aspects of the Mona Offshore Wind Project, an outline Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD) has been provided in the Application. These can be located on the Planning Inspectorate website:</p> <ul style="list-style-type: none"> <li>- Outline Offshore WSI and PAD (APP-204)</li> <li>- Outline Onshore WSI (APP-209)</li> </ul>

## 2.71 RSPB Cymru

Table 2.71: RR-071 – RSPB Cymru

Reference	Relevant Representation Comment	Applicant's response
RR-071.1	INTRODUCTION The UK is of outstanding international importance for its breeding seabirds and wintering marine birds. As with all Annex I and regularly migratory species, the UK has a particular responsibility under the Birds Directive to secure their conservation. Their survival and productivity rates can be impacted by offshore windfarms directly (i.e. collision) and indirectly (e.g. displacement from foraging areas, additional energy expenditure, potential impacts on forage fish and wider ecosystem impacts such as changes in stratification).	The Applicant notes RSPB's comment.
RR-071.2	The RSPB supports the deployment of renewable energy projects, providing that they are sited in appropriate places and designed to avoid potential adverse impacts on wildlife. We are grateful for the constructive pre-application discussions that have taken place with Mona Offshore Wind Farm Limited in respect of this proposal, particularly through the Evidence Plan process. As set out in Searle et al (2023), assessing impacts of offshore windfarms and other renewables developments is inherently uncertain. This uncertainty is propagated throughout the impact assessments, as there are not only direct impacts, but ecosystem wide impacts that can change, for example, the abundance and availability of prey. Multiple data sources and modelling techniques are used to capture a simplified version of reality. They do not fully capture the complexity of seabird behavioural or demographic processes in a dynamic marine environment.	<p>The Applicant welcomes RSPB's acknowledgement that constructive pre-application discussions have occurred through the Evidence Plan Process.</p> <p>Regarding uncertainty within environmental assessments for marine developments, the application for the Mona Offshore Wind Project has been conducted following current best practice (Natural England guidance, Parker <i>et al.</i> (2022)). and the latest advice from all relevant stakeholders and Statutory Nature Conservation Bodies (SNCBs).</p> <p>The assessments presented within the application (EIA and HRA) are considered precautionary, robust and scientifically valid. Each of the models presented come with inherent uncertainty but are all advocated by the SNCBs as the best available assessment methods (Natural England guidance, Parker <i>et al.</i> (2022)).</p> <p>Volume 2, Chapter 5: offshore ornithology [APP-057] assesses inter-related offshore effects between different phases of the development, impact pathways, and receptor groups. A specific inter-related effects assessment is presented within Volume 2, Chapter 11: Inter-related effects - offshore [APP-063].</p>
RR-071.3	Not recognising these uncertainties risks poorly informed decisions being made. Furthermore, an underestimation of impacts will have repercussions when consenting later offshore wind development. If a precautionary approach is taken from the beginning, the likelihood of irreversible damage occurring is reduced even whilst our knowledge	The Applicant wholly agrees with RPSB that underestimating impacts within assessments can lead to repercussions for species and the environment. However, the Applicant considers the assessments presented sufficiently precautionary, robust and scientifically valid.



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Reference	Relevant Representation Comment	Applicant's response
	<p>base is incomplete, and modelling improves. The precautionary principle requires the Applicant to demonstrate with scientific certainty that something would not be harmful. The concept of something being overly precautionary dismisses the inherent uncertainty in modelling and overlooks the simplistic version of reality that the modelling captures.</p>	
RR-071.4	<p>While methodological concerns remain, progress towards resolving a number of issues was made during the pre-application discussions for this project. We continue to have significant concerns relating to the project's in-combination and cumulative collision risk and displacement impacts including their assessment. The RSPB has engaged with the Applicant throughout the pre-application stage to provide our constructive advice as the Applicant has developed its project. We will continue, as far as practicable, to seek to engage with the Applicant throughout the Examination period. However due to the number of offshore wind farm project applications coming forward during 2024 we will face significant demands on our limited capacity. As a consequence, we will not be able to engage with any hearings associated with this application and will engage through written communications only and limited to when capacity allows.</p>	<p>The Applicant acknowledges RSPB's comment and welcomes RSPB's future engagement. Each of the specific points raised by RSPB have been considered by the Applicant, and responses provided below. In particular, please see row RR-070.9 for the Applicant's response to RSPB's specific concern regarding the Mona Offshore Wind Project's in-combination and cumulative impact assessments.</p>
RR-071.5	<p><b>OFFSHORE ORNITHOLOGY IMPACTS - SUMMARY OF RSPB POSITION</b></p> <p>We have significant concerns regarding the findings of some of the impact assessments. As a result of the methodological concerns, set out below, the RSPB considers that the impacts have not been adequately assessed and, as such consider Adverse Effect on Integrity (AEOI) cannot be ruled out beyond reasonable scientific doubt for collision impacts arising through the project alone and in combination with other projects for Manx shearwater at the following Special Protected Areas: - Copeland Islands SPA - Irish Sea Front SPA - Rum SPA - St Kilda SPA - Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island SPA? -</p>	<p>The Applicant notes RPSB's comment but considers that sufficient evidence and information has been presented in the application (HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites assessments (APP-033)) to be confident that AEoI can be ruled out beyond reasonable scientific doubt for all the sites and features identified by RSPB.</p> <p>The Applicant is confident that the evidence presented in the application and additionally clarified in this RR response provides a robust assessment of the impact on Manx shearwater breeding at the multiple SPA colonies within foraging range of the Mona Offshore Wind Project.</p> <p>All parameters used within collision risk modelling and distributional impacts (disturbance and displacement) utilised SNCBs recommended parameters (such as avoidance rate, mortality rate, displacement rate, nocturnal activity factor, flight</p>

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Reference	Relevant Representation Comment	Applicant's response
	Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA AEOI cannot be ruled out beyond reasonable scientific doubt for impacts arising through collision and distributional change arising through the project in combination with other projects on a range of species/SPA combinations	speed, and flight height). These parameters were agreed with the SNCBs during the second, third and fourth EWG meetings (and technical notes provided for the second meeting) during the pre-application phase (as presented in Consultation Report Appendices - Part 3 (D.25 to F) (APP-040).
RR-071.6	We also consider that the Assessment has not fully considered Ecosystem impacts arising from the proposed development and has not properly accounted for potential for population scale impacts to be magnified through effects of Highly Pathogenic Avian Influenza	<p>The Applicant has acknowledged the uncertainty around the potential for population-scale impacts of Highly Pathogenic Avian Influenza (HPAI) in paragraph 5.3.11 of Volume 2, Chapter 5: Offshore ornithology (APP-057). The baseline digital aerial survey (DAS) data was collected prior to the HPAI outbreak. However, as determined by Natural England guidance on HPAI in relation to baseline characterisation of offshore renewable projects (Natural England, 2022), the baseline data for the Mona Offshore Wind Project were all collected prior to summer 2022 (surveys commenced in March 2020 and were completed in February 2022), and therefore the assessments within Volume 2, Chapter 5: Offshore ornithology (APP-057) remain a valid representation of typical seabird distribution and density. JNCC, NRW and Natural England agreed to the approach to baseline characterisation for offshore ornithology through the Evidence Plan Process (Table 1.12 of Technical Engagement Plan (APP-041)).</p> <p>The Applicant considers in cases where there have been declines in the abundance of certain species, the impact assessments presented would proportionally decrease in line with a smaller population (where applicable). This is in line with the advice provided in Natural England's guidance on HPAI in relation to baseline characterisation of offshore renewable projects (Natural England, 2022). Impacts at the ecosystem level are assessed in Volume 2, Chapter 11: Inter-related effects (offshore) (APP-063). Where an impact is likely to have a synergistic impact on multiple receptors within the environs of the Mona Offshore Wind Project, the impact has been assessed.</p>
RR-071.7	<p>MANX SHEARWATER BASELINE CHARACTERISATION</p> <p>Manx shearwater can be active throughout the day and night, with different levels of activity at different times. Such activity is variable, for example, for birds tracked from Skomer, diving occurred during the day and peaked in the evening (Shoji et al., 2016), while nocturnal foraging was observed from tracking of birds from High Island, Ireland (Kane et al., 2020). These diel variations in activity mean that the somewhat limited amount of time digital aerial</p>	During the site-specific DAS survey, 2,544 individual Manx shearwater were detected in 11 out of the 24 months of surveying (Volume 6, Annex 5.1: Offshore Ornithology Baseline Characterisation Technical Report (APP-091). This species was, therefore, detected regularly during the surveys during the months in which the species is known to be present in the area. Best practice survey techniques were employed but cannot be undertaken at night which is an inherent limitation of the survey methodology. However, using other data sources (e.g. tagging data from local colonies) reduces some of the potential uncertainty regarding nighttime activity.

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Reference	Relevant Representation Comment	Applicant's response
	<p>surveys (DAS) were carried out is unlikely to properly characterise the activity of Manx shearwater at the Application site, (only one of the 24 survey flights for the baseline characterisation started before 0700). For these reasons the RSPB does not have confidence in the baseline densities of Manx shearwater presented, and therefore it is impossible to make any conclusions as to the significance of impacts.</p> <p>Issues of detectability are not only whether the nocturnal and crepuscular nature of some of the at-sea behaviours means that they are not captured by the survey flights but also whether the size and flight characteristics of the species make them harder to detect. Evidence that the surveys are recording Manx Shearwaters should not be taken as evidence that all of this species occurrence within the footprint during surveys has been detected. Deakin et al., 2023 highlight a need for experimental validation of these potential biases in aerial survey methods, including detectability, identification and diel variation. Without addressing these concerns, we are unable to rely on the densities of Manx Shearwater presented in the assessment and therefore unable to reach conclusions as to the significance of adverse impacts.</p>	<p>Available tracking data from Skomer, Skokholm, Lundy, Rum, and Copeland Island such as that provided in Guilford <i>et al.</i> (2008), Dean <i>et al.</i> (2010), Dean (2012), Padget <i>et al.</i> (2019) and Richards <i>et al.</i> (2019), indicates there is limited activity by Manx shearwater within the footprint of the Mona Offshore Wind Project. Only a few foraging trips have been recorded near and across the Mona Offshore Wind Project, suggesting that Manx shearwater does not regularly use this area (Guilford <i>et al.</i>, 2008; Dean <i>et al.</i>, 2010, Dean, 2012; Richards <i>et al.</i>, 2019).</p> <p>The baseline presented within Volume 6, Annex 5.1: Offshore Ornithology Baseline Characterisation Technical Report (APP-091) draws upon multiple data sources and is therefore robust. JNCC, NRW and Natural England agreed to the broad approach to aerial surveys for offshore ornithology through the Evidence Plan Process (Table 1.12 of Technical Engagement Plan (APP-041)).</p> <p>The low numbers recorded during DAS, supplemented by the tracking data indicate sporadic usage within the footprint of the Mona Offshore Wind Project. This, coupled with the low sensitivity of Manx Shearwaters to potential impacts (owing to the large foraging range of this species and low flying behaviour, for example, Johnston <i>et al.</i> (2014) showed that no birds flew above 20m), means that the Applicant is confident in the assessments presented and the conclusions drawn.</p>
RR-071.8	<p>POTENTIAL IMPACTS ARISING THROUGH COLLISION</p> <p>In respect of Manx shearwater, the Applicant has concluded no adverse impact arising through collision with rotating turbines. We disagree that such a conclusion can be reached because the manner in which the calculations have been carried out do not reflect potential behaviour in the vicinity of turbines. Fundamental to the consideration of collision risk for this species is the extent to which nocturnally active seabirds, such as Manx shearwaters, may be attracted to the illuminations required for turbines, support vessels and the construction or expansion of ports. Such attraction will cause behaviour change, which could in turn increase collision risk, for example if birds fly higher when attracted to lights. There is abundant evidence of light-induced disorientation of Manx shearwaters. This evidence</p>	<p>Wind farms are required to be illuminated in accordance with marine navigation regulations. Marking, lighting and aids to navigation will be employed during the construction, operation and maintenance, and decommissioning phases, as appropriate to ensure the safety of all parties.</p> <p>The review by Deakin <i>et al.</i> (2022) which the Applicant believes to be the information source for the light-induced disorientation evidence referred to by RSPB, identifies critical knowledge gaps relating to light attraction and disorientation. Specific aspects include: the range over which light attraction of nocturnal species may occur (and therefore the size of the light catch basin for wind farms and related activities or infrastructure); the extent to which light attraction is exacerbated by particular meteorological conditions (e.g. fog, rain); the influence of wavelength and pattern of illumination (flashing/steady); the extent to which light attraction differentially affects adults and juveniles, and for how long after fledging juveniles may remain particularly susceptible to light attraction.</p>

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	<p>includes the grounding of fledglings in lit areas (Miles et al., 2010) and collision with lighthouses and other illuminated structures (Guilford et al., 2019, Archer et al., 2015). If light-induced disorientation leads to individual birds circling the navigation lights on the nacelle or tower of turbines for protracted periods (as has been reported for birds disorientated by lighthouses or gas flares) the probability of collision with turbine blades or other surfaces is vastly increased. Alongside this increased collision risk, the energetic costs of attraction and disorientation may be sufficient to impact on long term survival and the ability to successfully rear young.</p>	<p>Positive and negative phototaxis is more likely to occur where birds are exposed to intense white lighting (Syposz <i>et al.</i>, 2021, and Deakin <i>et al.</i>, 2022). Offshore light from the Mona Offshore Wind Project will be less powerful than that from other illuminated structures such as lighthouses and, therefore, are unlikely to trigger the same level of response (Deakin <i>et al.</i>, 2022).</p> <p>In light of this information, the Applicant considers the assessment presented within Volume 2, Chapter 5: Offshore ornithology (APP-057) and HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites assessments (APP-033) to be scientifically valid and robust.</p>
RR-071.9	<p><b>METHODOLOGY FOR ASSESSMENT OF CUMULATIVE/IN-COMBINATION IMPACTS</b></p> <p>The RSPB recognise the difficulties with carrying out a full in combination assessment for a number of species SPA combinations because of the difficulties in obtaining historical data and the limitations in how it was collected and analyses. Regardless of these difficulties, it is important that such an assessment is carried out with consideration of these sites and Natural England have produced what we consider to be a practical and pragmatic solution, while fully acknowledging that it is imperfect; less so for displacement than collision risk but both are to a greater or lesser extent indicative of the potential scale rather than absolute quantification of impact. While it is acceptable for the Applicant to present alternative methodologies, it would be preferable for the outputs to be presented alongside those obtained following the recommendations of the Statutory Agencies.</p>	<p>Whilst it is the Applicant's view (in agreement with NRW) that data gaps associated with historic offshore wind projects are an aspect of cumulative impact assessments that would be better addressed at the strategic level rather than the project level, updates were made to the cumulative impact assessment in response to NRW's (as well as Natural England's and JNCC's) Section 42 advice with respect to historic offshore wind project impacts for the application. These updates also captured additional advice provided by Natural England on 23 October 2023. The cumulative and in-combination assessments presented in Volume 2, Chapter 5: Offshore ornithology (APP-057) and HRA Stage 2 ISAA for SPAs and Ramsar sites (APP-033), respectively, consider the quantitative impact of historic offshore wind projects where it has been possible to derive estimates from project-specific documentation. In the absence of quantitative assessment for historical projects, qualitative assessment has been presented where the information was available. The Applicant remains confident that the approach and cumulative / in-combination assessments presented in Volume 2, Chapter 5: Offshore ornithology (APP-057) and HRA Stage 2 ISAA for SPAs and Ramsar sites (APP-033) are robust, precautionary and provide sufficient detail to conclude no significant effects and no AEOI beyond reasonable scientific, respectively.</p>
RR-071.10	<p>The RSPB are particularly concerned in regard to in combination impacts in relation to Great Black-backed Gull at the Isles of Scilly SPA. Great Black-backed Gull breeding numbers (AON) declined by 52% in the UK between the Seabirds 2000 and Seabirds Count censuses (Lewis, 2023), although the majority of decline happened in Scottish colonies. However, a further decline was recorded by</p>	<p>The Applicant notes RSPB's concern about recent declines in great black-backed gull in response to Highly Pathogenic Avian Influenza (HPAI).</p> <p>The baseline DAS data was collected prior to the Highly Pathogenic Avian Influenza (HPAI) outbreak. However, as determined by Natural England's guidance on HPAI in relation to baseline characterisation of offshore renewable projects (Natural England, 2022), the baseline data for the Mona Offshore Wind Project were all collected prior to summer 2022 (surveys commenced in March</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>surveys carried out in response to the outbreak of Highly Pathogenic Avian Influenza (HPAI) Tremlett, et al., 2024. The total number of Great Black-backed Gull AONs recorded across all sites surveyed in 2023 decreased by 20% compared with the pre-HPAI baseline count for these sites, and a 32% decline was recorded in the Isles of Scilly SPA.</p>	<p>2020 and were completed in February 2022). Therefore, the assessments within Volume 2, Chapter 5: Offshore ornithology (APP-057) remain a valid representation of typical seabird distribution and density.</p> <p>The Applicant considers in cases where there have been declines in the abundance of certain species that the impact assessments presented would proportionally decrease in line with a smaller population (where applicable).</p>
RR-071.11	<p><b>ECOSYSTEM IMPACTS</b></p> <p>RSPB Cymru would welcome an inclusion consideration of the potential wider ecosystem impacts that may arise through the construction and operation of the wind farm. These could occur, for example, through changes in water column stratification arising from the presence of the wind farm ultimately altering the availability of prey to seabirds.</p>	<p>The Applicant would like to draw RPSB's attention to the inter-related effects assessment (Volume 2, Chapter 11: Inter-related effects (offshore) (APP-063)), where impacts at the ecosystem level are assessed. Where an impact is likely to have a synergistic impact on multiple receptors within the environs of the Mona Offshore Wind Project, the impact has been assessed.</p>
RR-071.12	<p><b>HIGHLY PATHOGENIC AVIAN INFLUENZA</b></p> <p>The current H5N1 strain of Highly Pathogenic Avian Influenza (HPAI) has affected UK wild bird populations on an unprecedented scale since it was first recorded in the country in Great Skuas in summer 2021, with seabirds and waterfowl particularly affected. The extent of reported mortalities attributed to HPAI in the UK and across Europe in 2022 demonstrated that HPAI had become one of the biggest immediate conservation threats faced by multiple seabird species, including some for which the UK population is of global importance. Many species impacted by HPAI are of conservation concern in the UK, and the outbreak comes on top of widespread declines reported by the latest seabird census. It is currently unclear what the population scale impacts of the outbreak will be, but it is likely that they will be severe. This scale of impact means that seabird populations will be much less robust to any additional mortality arising from offshore wind farm developments. It also means that there may need to be a reassessment of whether SPA populations are in Favourable Conservation Status. With such uncertainty as to the future of these populations, there is the need for a high level of precaution to be included in</p>	<p>As outlined in Volume 2, Chapter 5: Offshore Ornithology (APP-057) and Volume 6, Annex 5.1: Offshore Ornithology Baseline Characterisation Technical Report (APP-091), the baseline DAS data was collected prior to the HPAI outbreak. However, as determined by Natural England's guidance on HPAI in relation to baseline characterisation of offshore renewable projects (Natural England, 2022), the baseline data for the Mona Offshore Wind Project were all collected prior to summer 2022 (surveys commenced in March 2020 and were completed in February 2022), therefore the assessments within Volume 2, Chapter 5: Offshore ornithology (APP-057) remain a valid representation of typical seabird distribution and density.</p> <p>It is acknowledged that, in the short term at least, HPAI is likely to influence changes in seabird populations. However, it is considered that the most appropriate information to use in the Mona applications is the baseline DAS data, and the most recent colony counts (pre-HPAI) used within the assessment inform the impact assessments taken from Burnell <i>et al.</i>, (2023). This is due to the temporal overlap between the site-specific DAS and the colony counts for Seabirds Count (Burnell <i>et al.</i>, 2023)</p> <p>In addition, the Applicant considers in cases where there have been declines in the abundance of certain species that the impact assessments presented would proportionally decrease in line with a smaller population (where applicable). This is</p>

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Reference	Relevant Representation Comment	Applicant's response
	examination of impacts arising from the proposed development. The RSPB do not consider that these concerns have been adequately considered in the Assessment.	in line with the advice provided in Natural England guidance on HPAI in relation to baseline characterisation of offshore renewable projects (Natural England, 2022).
RR-071.13	Finally, the RSPB reserves the right to add to and/or amend its position in light of changes to or any new information submitted by the Applicant.	The Applicant notes RSPB's response.

## 2.72 Scottish Fisherman’s Federation (SFF)

Table 2.72: RR-072 – Scottish Fisherman’s Federation (SFF)

Reference	Relevant Representation Comment	Applicant’s response
RR-072.1	Representing Scottish Fishermen's Federation on Commercial Fisheries, Fisheries Liaison and Co-existence Plan (FLCP).	<p>Noted. 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 to understand stakeholder requirements for co-existence 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 (APP-199) which is secured through the deemed marine licence (Schedule 14 of the DCO, condition 18) and is expected to be secured in the separate marine licences. Mitigation and monitoring commitments are set out within the environmental statement chapters and the Mitigation and monitoring schedule (APP-196).</p> <p>Enabling co-existence and indeed, co-location was a key aim underpinning the Applicant's commitments to not close the entire development area during construction, the scallop mitigation zone (SMZ) and the orientation and spacing of infrastructure. Fishing receptor groups will be able to continue fishing within parts of the Mona Array Area and Mona Offshore Cable Corridor during construction. During the operations and maintenance phase, the measures adopted as part of the Mona Offshore Wind Project such as the SMZ, minimum infrastructure spacing of 1,400 m and roughly north-to-south alignment of wind turbine rows (as set out in APP-199), will provide the space for continued fishing within the Mona Array Area and the Mona Offshore Cable Corridor, and fishing vessels will be able to transit through these areas.</p>

## 2.73 Scottish Whitefish Producers Association Ltd

Table 2.73: RR-073 – Scottish Whitefish Producers Association Ltd

Reference	Relevant Representation Comment	Applicant's response
RR-073.1	<p>Main representation is around the commercial fisheries within and around the array and along export cable routes. The Outline Fisheries Liaison and Coexistence Plan (FLCP) amongst other outline plans are of extreme importance to my members who I represent.</p>	<p>Noted. 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 to understand stakeholders' requirements for co-existence 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 (APP-199), which is secured through the deemed marine licence (Schedule 14 of the DCO, condition 18) and is expected to be secured in the separate marine licence. Mitigation and monitoring commitments are set out within the environmental statement chapters and the Mitigation and monitoring schedule (APP-196).</p> <p>Enabling co-existence and indeed, co-location was a key aim underpinning the Applicant's commitments to not close the entire development area during construction, the scallop mitigation zone (SMZ) and the orientation and spacing of infrastructure. Fishing receptor groups will be able to continue fishing within parts of the Mona Array Area and Mona Offshore Cable Corridor during construction. During the operations and maintenance phase, the measures adopted as part of the Mona Offshore Wind Project such as the SMZ, minimum infrastructure spacing of 1,400 m and roughly north-to-south alignment of wind turbine rows (as set out in APP-199), will provide the space for continued fishing within the Mona Array Area and the Mona Offshore Cable Corridor, and fishing vessels will be able to transit through these areas.</p>



## 2.74 Scottish Power Renewables (WODS) LTD

**Table 2.74: RR-074 – Scottish Power Renewables (WODS) LTD**

Reference	Relevant Representation Comment	Applicant's response
RR-074.1	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 that West of Duddon Sands Windfarm is a minimum of 31.9 km from Mona Offshore Wind Project as stated in Table 10.10 of Volume 2, Chapter 10: Other sea users (APP-062).
RR-074.2	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	<p>The Applicant met with West of Duddon Sands Windfarm on the 8 November 2023 and shared details on the programme for delivery of Mona Offshore Wind Project including surveys and other points raised by West of Duddon Sands Windfarm such as wake effects as discussed below.</p> <p>An indicative construction programme for the Mona Offshore Wind Project is presented in Table 3.37 of Volume 1, Chapter 3: Project description (APP-050). The pre-construction survey programmes are not yet known, but will be shared with stakeholders when available, for example, through the issue of notice to mariners as secured under Schedule 14, Condition 13 of the Draft DCO (APP-023).</p> <p>As set out in Table 10.16 of Volume 2, Chapter 10: Other sea users (APP-062) and in the Mitigation and monitoring schedule (APP-196) the Applicant has committed to continued consultation through the life of the project, as required, with other offshore energy operators to minimise disruption to either party's operations and maximise coexistence.</p>
RR-074.3	SPRUKL would like to request a meeting to understand the project(s) in greater detail and to discuss the potential impacts on wake effects on existing developments and commercial compensation considerations. 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.	<p>The Applicant met with West of Duddon Sands Windfarm on the 8 November 2023 to discuss points raised by West of Duddon Sands Windfarm such as wake effects. Volume 2, Chapter 10: Other sea users (APP-062) considers offshore energy receptors, including offshore wind farms. West of Duddon Sands Windfarm is considered as part of the baseline (section 10.5.2.9–14) in this chapter.</p> <p>APP-062 sets out that NPS EN-3 (paragraph 2.8.44) recognises that offshore wind development will occur in or close to areas where there is other offshore infrastructure. The project boundary requirements in the Round 4 Information Memorandum specified that no offshore wind projects could be located within 7.5 km of an existing offshore wind farm. As described in APP-062 section 10.5.4, Figure 10.4 and Table 10.10, there are no other operational offshore wind farms</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>located within 7.5 km of the Mona Array Area and therefore the Mona Offshore Wind Project location adheres to the TCE siting criteria.</p> <p>As referenced in Volume 2, Chapter 10: Other sea users (APP-062), a recent study commissioned by TCE indicated that, for the non-site-specific scenarios modelled, potential wake effects level off with approximately 10 km separation between offshore wind farms, and for separations much larger than 20 km wake effects become vanishingly small (Frazer-Nash Consultancy Limited, 2023).</p> <p>The Mona Array Area has been reduced following the statutory pre-application consultation, as described in section 4.11.2 and Table 4.23 of Volume 1, Chapter 4: Site selection and consideration of alternatives (APP-051). This has increased the distance from the nearest existing operational wind farm by an additional 4.0 km, and also increased the distance from a number of other operational wind farms, thereby reducing the potential for wake effects. The distance between the Mona array area and West of Duddon Sands Windfarm is 31.9 km.</p> <p>On the basis of the distances between the Mona Array Area and other operational wind farms, including the West of Duddon Sands Windfarm, the potential for wake effects has been scoped out of further assessment of impact on other sea users.</p>

## 2.75 Sea Watch Foundation

Table 2.75: RR-075 – Sea Watch Foundation

Reference	Relevant Representation Comment	Applicant's response
RR-075.1	<p>I am the lead author on the Atlas of distributions and abundance of cetaceans and seabirds of Wales and surrounding waters, published in 2023 on behalf of Natural Resources Wales, and have provided advice including impact assessments to statutory agencies on several proposals for offshore renewable energy in the UK. We are currently undertaking monthly surveys of marine mammals and birds for the Morlais tidal turbine demonstration zone off NW Anglesey, and cetaceans surveys in north Anglesey and off the North Wales mainland coast, for bottlenose dolphins. With this interest, we would like to contribute advice on sites of importance for cetacean and seabird species, and potential impacts on particular species as well as to recommend mitigation measures where appropriate.</p>	<p>The Applicant notes your response and thanks you for highlighting your involvement in the Welsh Marine Mammal Atlas (WMMA) (Evans and Waggitt, 2023). The Applicant has used this data source extensively in the baseline characterisation for all species (see Volume 6, Annex 4.1: Marine Mammal Technical Report (APP-090)) and carried forward WMMA densities to the assessment for harbour porpoise, bottlenose dolphin and short-beaked common dolphin, considering the WMMA the most appropriate and suitable source for the relevant species' life history and use of the surrounding environment in the Irish Sea, as agreed with the marine mammal Expert Working Group (Technical Engagement Plan Appendices – Part 1 (A to E) (APP-042)). The Applicant also thanks you for highlighting the ongoing surveys being undertaken off NW Anglesey; the cetaceans surveys in north Anglesey and the surveys for bottlenose dolphins off the North Wales mainland coast. Since NRW is the relevant statutory consultee for the Mona Offshore Wind Project, the Applicant defers to NRW to make sure SeaWatch is included in discussions on sites of importance and mitigation measures, where appropriate.</p>

## 2.76 Stena Line Ltd

Table 2.76: RR-076 – Stena Line Ltd

Reference	Relevant Representation Comment	Applicant's response
RR-076.1	<p>Stena line operates six passenger and freight RoRo vessels in this area on three separate routes. We have engaged with the developers of the project from the outset and have submitted a commentary on their PEIR, identifying what we consider to be increased navigational safety risks to our operation which is amplified by the fact that there is a potential for three other new offshore wind farms to be constructed right on the course lines of these strategic services. The route which is most affected is our Belfast to Liverpool service which is served by two passenger RoRo vessels, capable of carrying 1000 persons and one freight RoRo vessel. Each vessel potentially transiting twice per daily. We acknowledge that the developer has made some concessions to reduce the Red line boundary after cumulative simulation exercises which have resulted in risk reduction. While this is welcomed there is still a residual increased risk above the current situation which will fall to us as operators to continue to manage for the lifetime of the project. We have further expressed concerns in relation to the increased transit time for the three vessels and the effect this will have on not only our increased carbon emissions along with its associated carbon tax. This will additionally have an effect on our bunker consumption and turn-around times in port. We are happy to continue to explore this with the developer and Planning Inspectorate.</p>	<p>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 modified the boundaries of the wind farm array area which has increased the available searoom to minimise the impacts to ferries, and has reduced the deviations required (as set out in section 7.9 and 7.11 of Volume 2, Chapter 7: Shipping and navigation (APP-059) and in section 4.11.2 of Volume 1, Chapter 4: Site selection and consideration of alternatives (APP-051)).</p> <p>The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also amended the boundaries of their respective projects to increase searoom and reduce the cumulative impacts on ferries. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and an NRA hazard workshop. As a result of these boundary amendments and commitments to control measures (e.g. development and adherence to an Aids to Navigation Management Plan, Design Plan, an Offshore Environmental Management Plan that includes a Fisheries Liaison and Co-existence Plan, an Offshore Construction Method Statement, which includes a Cable Specification and Installation Plan, a Vessel Traffic Management Plan, an Emergency Response and Cooperation Plan and use of notice to mariners, as set out in section 7.8 of Volume 2, Chapter 7: Shipping and navigation (APP-059) and which are all secured within the deemed marine licence in Schedule 14 of the draft DCO and expected to be secured within the standalone NRW marine licence), and noting that a residual risk over the baseline remains, the NRA Hazard Workshop concluded that all hazards, previously identified as unacceptable at PEIR, had been reduced to As Low As Reasonably Practicable (ALARP).</p> <p>The Applicant understand that the Stena Line Ltd Belfast to Liverpool service intersects with the Mona Array Area. For this service a revised passage plan was developed that would necessitate an additional 3.4 minutes of steaming time per trip to accommodate the Mona Offshore Wind Project alone. Cumulatively with other projects, plans and activities (the Morgan Offshore Wind Project: Generation</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>Assets and the Morecambe Offshore Windfarm: Generation Assets), this service would necessitate an extra 13 to 16 minutes of steaming time per trip. On an eight hour service, with greater existing operational variation in transit duration and turn around time, the deviation is not anticipated to result in significant operational impacts for the Mona Offshore Wind Project alone. Cumulatively with other projects, plans and activities, this impact is assessed as being of moderate adverse significance.</p> <p>The Applicant is committed to further engagement with Stena Line Ltd on the residual impacts throughout the examination phase of the Mona Offshore Wind Project.</p>

## 2.77 Stephen Sprei at Network Rail Infrastructure Limited

**Table 2.77: RR-077 – Stephen Sprei at Network Rail Infrastructure Limited**

Reference	Relevant Representation Comment	Applicant's response
RR-077.1	<p>We are instructed by Network Rail Infrastructure Limited (“Network Rail”) in relation to the application made by Mona Offshore Wind Ltd (“the Applicant”) for development consent to construct and operate the Mona Offshore Wind Project development (“the DCO Scheme”). This section 56 Representation is made on behalf of Network Rail. Network Rail is a statutory undertaker responsible for maintaining and operating the country’s railway infrastructure and associated estate. Network Rail owns and operates Great Britain’s railway network and has statutory and regulatory obligations in respect of it.</p> <p>Network Rail aims to protect and enhance the railway infrastructure and therefore any proposed development which is adjacent to and interfaces with the railway network or potentially affects Network Rail’s land interest will be carefully considered. The DCO Scheme includes cables that interface with the railway network and therefore will require certain standard protections for the benefit of the railway. Network Rail recognises the protective provisions for its benefit that are included in Part 8 of Schedule 10 to the draft DCO. Whilst Network Rail does not object in principle to the DCO Scheme, in addition to protective provisions for the benefit of Network Rail being included in the DCO Scheme, Network Rail requires the Applicant to enter into an Asset Protection Agreement and a Framework Agreement. Network Rail require a Framework Agreement to be entered into to manage the direct interface that the DCO Scheme has with the operational railway.</p> <p>It is noted that works detailed in Schedule 1 to the draft DCO relate to works on or adjacent to Network Rail’s existing operational railway and railway infrastructure. Network Rail requires that this work is covered by the Asset Protection Agreement. Asset Protection Agreements are always</p>	<p>Network Rail’s comments are noted.</p> <p>Detailed discussions regarding adequate protection of Network Rail’s assets are ongoing. Information on interactions with the Mona Offshore Wind Project is being shared with Network Rail to facilitate the ongoing discussions and to progress negotiations in relation to both the protective provisions and, where necessary, any relevant agreements with Network Rail.</p> <p>The Applicant expects the relevant documentation will be agreed before the close of the Examination.</p>

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Reference	Relevant Representation Comment	Applicant's response
	<p>required by Network Rail where works are significantly close in location and disruptive in nature to the operational railway network. Such agreements are well preceded to ensure the appropriate and necessary technical, engineering and safety requirements for working on, over or near Network Rail's operational railway are applied to the DCO Scheme.</p> <p>Due to the location of the Applicant's proposed works, Network Rail requires an Asset Protection Agreement in order to carry out its statutory duty. It is acknowledged that discussions with the Applicant to date are on-going. If the following criteria are met, then it is anticipated that Network Rail would be in a position to withdraw the objections made above:</p> <ol style="list-style-type: none"> <li>1. Network Rail's required amendments to the protective provisions are to be included in the draft DCO for the DCO Scheme;</li> <li>2. the Applicant enters into a Deed of Undertaking/Framework Agreement to provide formal protection for Network Rail's statutory undertaking;</li> <li>3. any required easement and Asset Protection Agreements or any other required agreements are entered into in respect of the acquisition of addressing both the acquisition of rights over Network Rail's operational land and carrying out of works on or adjacent to Network Rail's operational land; and</li> <li>4. Network Rail is granted with clearance and any necessary regulatory consents.</li> </ol> <p>Entry into any of the agreements above is subject to internal clearance being granted within Network Rail following internal consultation with affected stakeholders across the business. Network Rail reserves its position, both in representation and in submissions at hearings, to seek the amendments to the draft DCO to ensure protective provisions are inserted for the benefit of Network Rail's operational infrastructure, which is affected by the DCO Scheme.</p>	

## 2.78 Stuart Neil

Table 2.78: RR-078 – Stuart Neil

Reference	Relevant Representation Comment	Applicant's response
RR-078.1	I make my principal submission re: EN010137 i have kept it short at this stage as to comply with the 500 word limit. In principle I support this project, however i have the following concerns and cannot support the application in its current format.	<p>The Applicant welcomes your response.</p> <p>The Applicant welcomes the engagement from Stuart Neil and would like to discuss the heads of terms issued for the land rights being sought over the land.</p>
RR-078.2	There is a road safety issue with proposed entry/exit into TCC2, on the B5381 near to penyrefail crossroads, due to the topography in that location.	<p>The impact on road safety of the local road network, strategic road network and other transport receptors is assessed in Volume 3, Chapter 8: Traffic and Transport (APP-071). The assessment comprises a robust two-stage process looking at road safety considerations including topography and Personal Injury Accident (PIA) data within the traffic and transport study area. PIA data for roads within the traffic and transport study area is presented in Volume 7, Annex 8.3: Personal Injury Accident Locations (APP-173). For the road links closest to the Penyrefail crossroads, four accidents were reported on link 14 (A548 Chapel Street between Abergele Hospital and B5381 Roman Road) and no accidents were reported on link 15 (B5381 Roman Road between A548 and Moelfre) within the last five years.</p> <p>Swept path analysis has been undertaken to inform the preliminary access design of the TCC2 access which has also considered road geometry and topography. The preliminary access design for TCC2 and access strategy are presented in the Outline Highways Access Management Plan (APP-228). The Outline HAMP forms part of the Code of Construction Practice and is secured in Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03). The final HAMP will be approved by the local planning authority in consultation with the relevant highways authorities and trunk road agent.</p> <p>The assessment of PIA data reported in Chapter 8: Traffic and Transport (APP-071) concluded that none of the incidents reported for traffic and transport study area (including the Penyrefail crossroads) were caused by the existing highway layout or geometries.</p>
RR-078.3	Also The proposed development, as applied for, of TCC2 will result in significant highway damage.	Video surveys will be undertaken on local roads to record the baseline condition of the highway; the surveys will be repeated when construction activities in a given area have ceased. The roads to be surveyed will be agreed with Highways Authorities. The video surveys will be undertaken as described in the Outline



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Reference	Relevant Representation Comment	Applicant's response
		Construction Traffic Management Plan (APP-225), which forms part of the Code of Construction Practice (CoCP). The CoCP is secured by a Requirement in the draft DCO (C1 Draft Development Consent Order F03). The final Construction Traffic Management Plan will be approved by the local planning authority in consultation with the relevant highways authorities.
RR-078.4	Whilst i am in agreement of proposed 40mph speed limit on the A548, at penyrefail crossroads to facilitate TCC3.I believe the entrance to TCC2 should also be on the A548. Making use of the already proposed 40 mph limit.	The proposed entrance to TCC2 is not from the A548 because from a road safety perspective, it is preferable to make use of existing accesses and junctions on A classification roads rather than creating new ones.
RR-078.5	I have issue that the proposed corridor width in one area near Penyrefail crossroads, it is unnecessarily wide and does not comply with the information disclosed on the application.	The Onshore Cable Corridor is 74m wide for the majority of its length, however in localised areas the corridor may be up to 100m, e.g, where obstacles will be crossed using trenchless techniques (see ES Volume 1, Chapter 3: Project Description (APP-050) and flexibility is needed within the cable corridor to accommodate that. The location of these crossings is shown in ES Volume 5, Annex 5.4: Onshore Crossing Schedule APP-085). Trenchless techniques will be required to cross beneath the B5381 Roman Road and the unclassified road north of the B5381 at the Penyrefail crossroads.
RR-078.6	One of the proposed cable routes will cause unnecessary and irreversible ecological damage to a very sensitive wildlife habitat.	The design of the Mona Offshore Wind Project has been refined following statutory consultation including the deselection of options along the Mona Onshore Cable Corridor and reducing the width of the Onshore Cable Corridor from 100 m in the Preliminary Environmental Information Report to 74 m for the majority of the route in the Environmental Statement. The Applicant has also committed to avoid key habitats (e.g. woodland) through the use of trenchless techniques as shown in Volume 5, Annex 4.3: Onshore Crossing Schedule (APP-083). Measures to mitigate impacts on ecological receptors will be implemented as described in the Outline Landscape and Ecological Management Plan (LEMP) (APP-208) This is secured as a Requirement of the draft DCO (C1 Draft Development Consent Order F03). The final LEMP will be approved by the local planning authority. With the implementation of these measures, no significant adverse effects on ecological habitats have been identified (Volume 3, Chapter 3: Onshore Ecology (APP-066)).
RR-078.7	Some very important Ancient trees have not been considered or indicated near the proposed crossing point. in the area of penyrefail crossroads, any trenchless method will damage roots causing habitat loss for bats, owls, woodpeckers endangered wildlife including redstarts and resulting environmental damage.	A tree survey has been undertaken for the Mona Offshore Wind Project which identifies the location, age and condition of trees within the Mona Onshore Development Area including a number of mature trees to the south east of Penyrefail crossroads (see ES Volume 7, Annex 6.6: Tree Survey and Arboricultural Impact Assessment (APP-160)). The Mona Offshore Wind Project has been designed to avoid areas of ancient woodland by committing to the use of

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		<p>trenchless techniques when crossing these feature (see Volume 5, Annex 4.3: Onshore Crossing Schedule (APP-083)). The design also avoids the loss of any veteran trees. A programme of site investigations will be undertaken at locations along the Onshore Cable Corridor. The results of the investigations will be used to inform the detailed design of the trenchless techniques at locations where required. The depth of crossings beneath ancient woodland will be appropriate to ensure damage to tree roots is avoided. A buffer of 15 m will be maintained between areas of ancient woodland and construction areas. Measures will be implemented in accordance with the principles set out in the Outline Onshore Construction Method Statement, which secured as part of Code of Construction Practice under Requirement 9 of the draft DCO (C1 Draft Development Consent Order F03). The final Onshore Construction Method Statement will be prepared during detailed design and will be agreed with the relevant planning authority.</p>
RR-078.8	<p>Natural springs and the watercourse would be directly effected by any proposed cable crossing at certain points near penyrefail crossroads.</p>	<p>The Ordnance Survey mapping used in ES Volume 7, Annex 1.1: Aquifers, Groundwater Abstractions and Ground Conditions (APP-115) does not identify any springs in the vicinity of Penyrefail crossroads. The underlying Till deposits are not typically associated with springs, however there are a number of wells in the area which suggests that shallow groundwater may occur. On this basis, it is possible there may be some form of spring discharge to the watercourse, however the springs are unlikely to cover a large catchment and therefore, the potential for interaction with the Onshore Cable Corridor is reduced.</p> <p>Investigations will be undertaken to characterise ground conditions as part of the onshore site preparation works (as defined in the draft DCO (C1-Development Consent Order F03). These investigations will be undertaken post consent.</p> <p>The detailed design of the watercourse crossing near Penyrefail crossroads will be informed by site investigations and agreed with the relevant planning authority. The design will follow the principles of the Outline Onshore Construction Method Statement (APP-227) which is secured as part of the Code of Construction Practice (CoCP under Requirement 9 of the draft DCO (C1 draft Development Consent Order F03). An Outline Onshore Construction Method Statement is provided in the DCO application (C1 Draft Development Consent Order F03)) The final Onshore Construction Method Statement will be prepared during detailed design and will be agreed with the relevant planning authority. The watercourse crossings will be constructed in accordance with the detailed method statement.</p>
RR-078.9	<p>Existing Drainage pipes and ditches either side of the B5381 have not been indicated or considered and any cable crossing would result in directly affecting the watercourse</p>	<p>Site preparation works will also include drainage surveys to identify the location and type of field drainage systems.</p>

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Reference	Relevant Representation Comment	Applicant's response
	and increase the potential for contamination of said watercourse.	Pre-construction drainage will be installed to intercept existing land drains and divert water away from the working area where possible and to maintain existing drainage flows. Construction surface runoff will only be discharged to a watercourse under the conditions of an environmental permit or exemption from the relevant authority and following treatment and attenuation where required. Measures to control surface water runoff will be implemented in accordance with the Outline Construction Surface Water Drainage Management Plan, which is secured as part of the Code of Construction Practice under Requirement 9 of the draft DCO (C1Draft Development Consent Order F03). The final Construction Surface Water Drainage Management Plan will be prepared during detailed design and will be agreed with the relevant planning authority.
RR-078.10	If the application is approved in its current state there will be significant economic damage and significant damage to agriculture and tourism which is the mainstay in the penyrefail crossroad area.	<p>The Applicant disagrees that the Mona Offshore Wind Project will result in significant economic damage and significant damage to agriculture and tourism.</p> <p>The socio-economics and tourism study areas (as defined in Figure 3.1 of Volume 4, Chapter 3: Socio-economics (APP-077)) both extend across the North Wales sub-region given the strategic nature of the Mona Offshore Wind Project and the reach of potential socio-economics and tourism effects. This enables the assessment to consider the overall effects in proportion to the scale of the project.</p> <p>The onshore assessment takes into account the landscape and visual impacts and land use and recreation assessments which have more localised study areas.</p> <p>The potential impacts of the Mona Offshore Wind Project on economic receptors (including employment and GVA) are assessed to have a beneficial effect; minor adverse effects are identified on tourism receptors, however these effects are not significant in EIA terms (Volume 4, Chapter 3: Socio-economics and Community (APP-077)). An Outline Skills and Employment Plan (SEP) (APP-210) that sets out the outline approach to help develop and support the economic benefits associated with the Mona Offshore Wind Project in relation to skills and employment within the offshore wind sector. The Outline SEP is secured as a Requirement of the draft DCO (C1 Draft Development Consent Order F03). The final SEP will be prepared post consent following a community needs analysis.</p> <p>Agricultural impacts as a result of the Mona Offshore Wind Project are assessed in Volume 3, Chapter 7: Land Use and Recreation (APP-70). The assessment concludes there would be no significant adverse effects in terms of temporary and permanent disruption to landowners as a result of the Mona Offshore Wind Project.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-078.11	The proposed cable route and associated development near penyrefail crossroads is inefficient and of bad design. The applicant's own water management plan indicates that the topography dictates, that the cable should pass as close to the penyrefail crossroads as possible. Therefore any contaminated runoff is then dealt within the catchment of the main drain system and can appropriately and legally be dealt with. The application is lacking in detail and is contradictory. Until the applicant can provide firm details of what their plans for the project are it is impossible for the planning inspectorate panel or the public to accurately discuss the impact of a plan that is incoherent.	The Applicant notes your response and will be happy to respond to questions regarding specific elements of the design during the Examination process. Surface water runoff from the Onshore Cable Corridor will be managed within the Order Limits of the Mona Offshore Wind Project and in accordance with the principles set out in the Outline Construction Surface Water Drainage Management Plan which is secured as part of the Code of Construction Practice under Requirement 9 of the draft DCO (C1Draft Development Consent Order F03). The final Construction Surface Water Drainage Management Plan will be prepared during detailed design and will be agreed with the relevant planning authority.
RR-078.12	The application has not fully complied with the requirements or spirit of the planning act 2008.	The DCO application for the Mona Offshore Wind Project has complied with the requirements of the Planning Act 2008 as set out in J2: Planning Statement (APP-186).
RR-078.13	There are missing references to physical obstacles within the corridor application, eg missing existing power lines. I conclude my representation's for EN 010137	Physical obstacles along the Mona Onshore Cable Corridor and the proposed crossing techniques are identified in Volume 5, Annex 4.3: Onshore Crossing Schedule (APP-083).

## 2.79 Suzanne Johnston

Table 2.79: RR-079 – Suzanne Johnston

Reference	Relevant Representation Comment	Applicant's response
RR-079.1	<p>Whilst I agree in principle for this, and the Awel Y Mor wind farm, my concern is the impact the construction and additional traffic in my area of [REDACTED] From the maps and documents I have seen posted along routes etc, it appears that the proximity to my property of this added traffic will come quite close. I would like to know what impact this will have on the local residents of [REDACTED] and nearby properties. [REDACTED] is a small village, which already has increasing traffic numbers to which this extra traffic will be a major cause of concern.</p>	<p>Notwithstanding the redaction, the Applicant is able to respond to the specific points made in your Relevant Representation.</p> <p>The proposed access routes for construction traffic are identified in Volume 7, Annex 8.7: Traffic and Transport Figures (APP-177). The works near Engine Hill as shown on the Work Plan -Onshore (APP-008) comprise road widening to allow for the movement of HGVs and cable drum vehicles. Volume 3, Chapter 7: Traffic and Transport (APP-070) predicts there will be a 5% change in daily traffic flows along the nearest road link as a result of construction traffic associated with the Mona Offshore Wind Project. This change in flow is below the threshold set out in IEMA guidance requiring assessment of environmental effects such as driver delay, The overall effect is negligible. The Applicant is aware of community and resident concerns regarding traffic. Measures to manage construction traffic will be implemented in accordance with the Construction Traffic Management Plan (APP-225) which forms part of the Code of Construction Practice (CoCP). The CoCP (Outline CoCP (APP-212)) is secured by DCO requirement.</p>

## 2.80 Tan-y-Mynydd Trout Fishery Limited

Table 2.80: RR-080 – Tan-y-Mynydd Trout Fishery Limited

Reference	Relevant Representation Comment	Applicant's response
RR-080.1	<p>The planned route for the underground onshore cables to the St Asaph substation is proposed to pass to the South of the fishery. The proposed route will cross the line of a natural spring and associated brook from which water is taken to supply the 5 lakes on the trout fishery. It is vital that the construction works to excavate the cable trenches and the subsequent infilled trenches do NOT interfere with the natural course of the water coming off Moelfre mountain that we rely upon for our supplies to the lakes. In the event that the line and or extent of water flowing down this water course is affected temporarily or worse still permanently that the viability and even existence of the trout fishery will be negatively impacted. We therefore request that suitable monitoring regimes (before work, during construction and long term post installation) be required of the project. In the event that the water course is negatively impacted by th project we require an assurance that suitable compensation arrangements (entirely at the cost of the project) will be put in place to make good any negative revenue and/or asset value implications.</p>	<p>The Applicant has actively engaged with Tan-y-Myndd Trout Fishery Ltd during the DCO application process, in particular during the statutory consultation which informed the refinement of the Onshore Cable Corridor.</p> <p>The trout fishery was not specifically identified in the Environmental Statement as a potential receptor as the refinement of the Onshore Cable Corridor meant it was no longer adjacent, or in proximity (over 500m), to the Order Limits. However, the Tan-y-Mydd Trout Fishery is within the study area for the hydrogeological baseline of the Mona Onshore Development Area in Volume 7, Annex 1.1: Aquifers, groundwater abstractions and ground conditions (APP-115) and Annex 1.2: Groundwater sources of supply – hydrogeological risk assessment (APP-116), which shows that Tan-y-Mydd Trout Fishery is underlain by glacial till deposits and the Elwy Formation.</p> <p>Dialogue has continued with Tan-y-Myndd Trout Fishery following the submission of the DCO application for the Mona Offshore Wind Project when the Applicant was made aware of concerns relating to potential construction impacts on a spring and watercourse to the south of the Onshore Cable Corridor.</p> <p>The Applicant is engaging with Tan-y-Myndd Trout Fishery Ltd to confirm the groundwater and surface water resources that support the lakes and the catchment of these resources. Baseline conditions of these resources will be established prior to construction and communicated to the trout fishery. Measures to mitigate potential construction impacts from surface water runoff and groundwater dewatering will be implemented in accordance with the Outline Construction Surface Water Drainage Plan (APP-218), which forms part of the Code of Construction Practice. A commitment to undertake monitoring of the relevant groundwater and surface water resources will be added to the Outline Construction Surface Water Drainage Plan (APP-218).</p>

## 2.81 The Crown Estate

Table 2.81: RR-081 – The Crown Estate

Reference	Relevant Representation Comment	Applicant's response
RR-081.1	The Crown Estate requests to be registered as an Interested Party in the examination of the Mona Offshore Wind Farm. Our interest in the project is that Mona Offshore Wind Limited holds an Agreement for Lease from The Crown Estate.	This is noted and the Applicant will continue to engage with The Crown Estate throughout the examination.

## 2.82 The Executor of the Late Sir David Watkin Williams-Wynn. Bt.

Table 2.82: RR-082 – The Executors of the Late Sir David Watkin Williams-Wynn. Bt.

Reference	Relevant Representation Comment	Applicant's response
RR-082.1	We act for The Executors of the Late Sir David Watkin Williams-Wynn. Bt. & The Trustees of the Wynnstay 1967 Settlement (Trustees Richard Williams and Capt Timothy Bell) ("the Estate"). The Estate objects to the DCO application, and an overview of representations are:	This is noted by the Applicant. See responses to the specific points made in the rows below.
RR-082.2	1. No proper reasoning or justification has been provided for the selection of the sites and why the Estate's site is considered more desirable when compared to neighbouring sites. This is despite numerous requests.	<p>The Applicant has undertaken a rigorous and robust site selection process in relation to the proposed siting of the Mona Offshore Wind Project onshore substation.</p> <p>It is the Applicant's position, in accordance the policies set out in NPS EN-1, and based on input from the multidisciplinary project team and stakeholder engagement, that the proposed onshore substation south of immediately south the National Grid Bodelwyddan substation (Onshore Substation Option 2) offers the appropriate option for the siting of the Mona Offshore Wind Project onshore substation.</p> <p>A full reasoning and justification for the selection of the proposed onshore substation is provided in Section 4.9.6, Section 4.10.6 and Section 4.11.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). This is also supported by Section 1.2, Section 1.3.4 and Section 1.4.4 of Volume 5, Annex 4.2: Site Selection BRAG Report annex (APP-082).</p> <p>This decision where to locate the onshore substation was presented to the Site Selection Expert Working Group (EWG) and announced via newsletter and online publication in August 2023 (along with an announcement regarding the preferred onshore cable route). The Estate were informed of the decision directly.</p> <p>Throughout the site selection process and prior to the Order Limits being finalised, the Applicant requested meetings with the affected party on numerous occasions to further the detailed discussions regarding the design. The Applicant has been granted a single meeting, held virtually, but no meaningful responses have been received outside of the examination phase and as such the Applicant has responded through written responses.</p>
RR-082.3	2. The extent of the land acquired is too large for the intended purposes as such it is inappropriate. Land subject	The principles and commitments regarding the extent of the land for acquisition associated with the ecological and landscaping requirements around the onshore



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	<p>to the DCO should only be what is reasonably necessary to carry out the scheme.</p>	<p>substation are detailed in Section 1.7 of the Outline Landscape and Environmental Management Plan (APP-208).</p> <p>The landscape and ecology management proposals have been developed to avoid, reduce and manage impacts on landscape and ecology during construction, operations and maintenance of the Mona Offshore Wind Project.</p> <p>As compulsory acquisition rights are being sought to ensure the delivery of the Mona Offshore Wind Project, the Applicant is required to minimise its interference with and use of the land within the Order Limits.</p> <p>The Onshore Substation footprint has been sized appropriately for its intended purpose. This is to contain the electrical components for transforming the power supplied from the offshore wind farm to 400 kV and to adjust the power quality and power factor, as required to meet the UK Grid Code for supply to the national grid. The project has committed to a Gas Insulated Switchgear (GIS) onshore substation (as referred to in Table 4.8 within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051)). This results in a maximum footprint of 65,000m<sup>2</sup> meaning that the maximum footprint of the onshore substation has reduced by 60,000m<sup>2</sup> (from 125,000m<sup>2</sup>) as proposed at PEIR.</p> <p>For landscape and ecological works at the Onshore Substation that are required to mitigate the effects of the Onshore Substation on nearby receptors and ecological features, permanent acquisition of land is needed to ensure that the relevant mitigation works are delivered and maintained for the duration of the Mona Offshore Wind Project.</p> <p>Natural Resources Wales have confirmed in their Relevant Representation that they “agree with the conclusions in the ES Onshore Ecology (APP-066) and the recommendations and proposed principles for mitigation in the Outline Landscape and Ecology Management Plan (APP-208)”.</p>
RR-082.4	<p>3. The land which is sought is high-quality agricultural land that is irreplaceable. The loss of land will adversely impact the Estate's ability to be sustainable in terms of agriculture, as well as the amenity and visual impact this will have on the Estate and its well established tenants and community it supports.</p>	<p>Volume 3, Chapter 7, Land Use and Recreation (APP-070) identifies that approximately 1.5 hectares (ha) of Subgrade 3a agricultural land (i.e. best and most versatile agricultural land) will be permanently affected by the Onshore Substation and associated works. Based on National Policy under Planning Policy Wales and the criteria for consultation on the loss of best and most versatile land within Welsh Government provided in TAN 6 (Annex B, paragraph B2), this is not considered to be a significant loss of the best and most versatile agricultural land, as the area of Subgrade 3a affected falls well below the threshold of 20ha identified in this policy.</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>The majority of permanent land loss will affect Subgrade 3b land which is not classified as 'best and most versatile agricultural land'. Impacts on the operation of the estate and the use of the land by a dairy enterprise are assessed in Volume 3, Chapter 7: Land Use and Recreation (APP-070). In addition to temporary land take, there would be a permanent loss of land from a single land holding associated with the Onshore Substation and impact on a land holding that farm this land via informal agreement. However, this would have no effect on the overall structure of the wider farming framework within the area or local agricultural productivity.</p> <p>Impacts of the Mona Offshore Wind Project on landscape and visual resources are assessed in Volume 3, Chapter 6: Landscape and Visual Resources (APP-069). Landscape planting will be provided at the Onshore Substation in accordance with J22: Outline Landscape and Ecology Management Plan (LEMP) (APP-208). With the implementation of the measures set out in the Outline LEMP (and shown on the Illustrative Landscape and Ecology Strategy Plan) the effects at various representative viewpoint reduce from significant at Year 1 to not significant at Year 15.</p>
RR-082.5	<p>4. The proposed access route, is inappropriate, there are other sensible alternatives. There is little need to dissect multiple fields especially since no justification for doing so has been given. By dissecting the fields, the Estate's land will be sterilised, thus adversely impacting the Estate.</p>	<p>The Applicant has undertaken a rigorous and robust site selection process in relation to the proposed access route to the onshore substation for the Mona Offshore Wind Project.</p> <p>Consideration of alternatives for the onshore substation access route are discussed in Section 4.11.7 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). This is also supported by Section 1.4.4 of Volume 5, Annex 4.2: Site Selection BRAG Report (APP-082).</p> <p>Six potential options were considered for the onshore substation operational access route once the onshore substation site was selected. Three routes identified engineering considerations that did not make them feasible solutions (as per Table 1.5 of Volume 5, Annex 4.2: Site Selection BRAG Report (APP-082)). One route had significant impacts on landscape and visual and onshore ecology associated with the requirement to remove hedgerows and woodland. The remaining two options represented the longest and shortest routes from the public highway to the onshore substation.</p> <p>Both remaining options were presented to the Site Selection EWG at the August 2023 progress update, with feedback sought from NRW regarding the interaction with the Gwynt y Môr OFTO mitigation land and the proximity to the Ancient Woodland. No objections were raised with the solutions proposed.</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>The shortest option was selected as it utilised a previously used route (for the Burbo Bank Extension Offshore Wind project) and could be screened from visual receptors using the existing woodland and infrastructure. The routing has sought to minimise the impact on land that will be retained by the estate and as such follows the most direct route. As a result, any land returned would seek to have the most efficient square headlands.</p>
RR-082.6	<p>5. The potential impacts of the physical structure of the proposed substation and associated works, which include altering the watercourse, result in alterations to the natural subterranean water flows. This could result in poorer quality land surrounding the Estate's land. Any mitigation has not been adequately addressed.</p>	<p>The underlying superficial and bedrock geology of the Onshore Substation is identified in Volume 7, Annex 1.1: Aquifers, groundwater abstractions and ground conditions, which shows that glacial till deposits are likely to be relatively thick at the Onshore Substation and comprise cohesive, clay-rich deposits. The assessment of potential impacts on groundwater quality and quantity in the glacial till superficial aquifer (see Volume 3; Chapter 1: Geology, Hydrogeology and Ground Conditions (APP-064) concludes that effects will be of minor adverse significance. On this basis, it is unlikely that the subterranean water flows on surrounding land would be significantly adversely affected.</p> <p>The diversion of the ordinary watercourse at the Onshore Substation will be designed (as a minimum) to the same dimensions as the existing watercourse to ensure existing water flow capacities are maintained. The detailed design of the watercourse diversion will be in accordance with J27: Outline Operational Drainage Management Strategy (APP-231). With these mitigation measures in place, the impact from the increase in flood risk from the diversion of the ordinary watercourse is not considered to be significant (see Volume 3, Chapter 2: Hydrology and Flood Risk (APP-065)).</p>
RR-082.7	<p>6. The impact of the additional substation is compounded due to existing infrastructure and further extensions to the grid's infrastructure, making this a monolithic development which is taking land from the natural environment. Existing infrastructure on the Estate's land is currently not visible from other areas, the extension of that substation and any additional infrastructure required will result in severe visual impacts that cannot be mitigated.</p>	<p>Section 4.11.7 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051) outlines the site selection considerations related to the visual screening afforded by the selected location for the onshore substation. Areas to the east and west of the onshore substation were identified as suitable for strategic landscape screening, inclusive of tree planting to complement the surrounding woodland and tree species to the north of the onshore substation. The onshore substation site benefits from existing topography such that appropriate planting would enable residential properties to the east and west to be screened over the lifetime of the project. Section 1.7 of the Outline Landscape and Ecological Management Plan (APP-208) outlines the guiding design principles that inform the guiding landscape mitigation proposals in relation to integrating the onshore substation into the surrounding landscape.</p> <p>Section 6.17.3 of Volume 3, Chapter 6: Landscape and Visual Resources summarises the potential visual effects associated with the onshore substation and</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>concludes that potentially significant impacts may arise for walkers using public footpath 105/6 to the east of Pentre-mawr (to the west of the onshore substation). The view east from the southern end of public bridleway 208/3 adjacent to Coed Esgob (currently not publicly accessible) would not be significantly affected due to intervening vegetation.</p> <p>Walkers and cyclists using the local road south of the Onshore Substation at the base of Cefn Meiriadog have the potential to experience significant visual effects, from the change in views, due to the development of the onshore substation. No other significant visual effects are predicted to be experienced by people using local roads, during the construction, operations and maintenance and decommissioning of the Mona onshore transmission assets.</p> <p>No additional, cumulative effects were judged to be significant on landscape and seascape character or on people's views or visual amenity.</p> <p>The cumulative effects assessment (CEA) throughout all chapters within Volume 3 has considered the Mona Offshore Wind Project, alongside the information available with respect to the National Grid Bodelwyddan substation extension proposal. The CEA has been undertaken on the basis of the latest available information in the public domain, which is the Autumn 2023 consultation material. It is understood that the application for the proposal is imminent. If further information is available for the proposal before the decision on the Mona Offshore Wind Project, the Applicant will provide an update to the cumulative assessment, presented within those relevant chapters within Volume 3.</p>
RR-082.8	7. The nature of the interests to be acquired goes beyond what is necessary. Seeking a freehold interest for a substation and the access road is not standard.	The Statement of Reasons (APP-029) sets out the Applicant's justification for seeking powers of compulsory acquisition. Paragraph 1.3.2.30 details the Applicant's requirement to seek the freehold acquisition for the Onshore Substation and access road. Section 1.10 sets out the Applicant's proposals and justification for each class of acquisition.
RR-082.9	8. The proposed environmental mitigation is not adequate and taking additional land to implement mitigation measures is not appropriate. There are suitable alternatives that can be carried out on existing habitats and reserves in close proximity.	<p>In accordance with the Overarching National Policy Statement for Energy (EN-1), the proposed environmental mitigation has been designed in line with the mitigation hierarchy. Under the mitigation hierarchy developers must seek to avoid, reduce and mitigate environmental impacts before considering offsite compensation. Appendix F of the Outline Landscape and Ecological Management Plan (APP-208) provides justification for the requirement to use land across the estate for mitigation purposes.</p> <p>In addition to applying the mitigation hierarchy, the Applicant has applied a step-wise approach to developing the proposed biodiversity benefit measures, as</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>required by Planning Policy Wales 12. Table 1-1 of the Biodiversity Benefit and Green Infrastructure Statement (APP-193) sets out how this has been applied and where further information on each step (i.e. avoid, minimise, mitigate/restore, compensate on site and compensate off site) can be found within the application documents.</p> <p>In their relevant representation, Natural Resources Wales have stated “<i>we agree with... the recommendations and proposed principles for mitigation in the Outline Landscape and Ecology Management Plan</i>”.</p>
RR-082.10	<p>9. The Estate has severe concerns about the potential impact of electro-magnetic fields, particularly in relation to fields #2 and #44. No correspondence has been received from the promoter regarding the affects the electro-magnetic fields may have and how any harm can be mitigated.</p>	<p>Volume 4, Chapter 4: Human Health of the Environmental Statement (APP-078) outlines that for onshore electrical infrastructure, actual electromagnetic field (EMF) risks are scoped out on the basis that the Mona Offshore Wind Project would adopt the International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines and Government voluntary Code of Practice on EMF public exposure. Such considerations are inherent to the detailed engineering considerations of cable specification and routing. Relevant public EMF exposure guideline limits are noted in the National Policy Statement for Electrical Networks Infrastructure (EN-5) which is relevant to, and would be complied with by, the Mona Offshore Wind Project. These guidelines are long standing and have a high safety margin. The levels of exposure that they require would not pose a risk to public health.</p>
RR-082.11	<p>10. The substation is core and non-contiguous, thus further breaking up the Estate. As a result, this will reduce the Estate's ability to keep the deer population in check which in turn will have an impact on the wider estate management.</p>	<p>The Applicant has undertaken a rigorous and robust site selection process in relation to the proposed access route and site selection of the onshore substation for the Mona Offshore Wind Project and refers to the comments made above in points 1 and 2.</p> <p>The Applicant will continue to seek engagement with the affected party regarding the deer population to obtain an understanding of how impacts can be mitigated and how the deer population can continue to be managed along with other agricultural and estate operations. The Applicant wishes to meet with the affected party to review plans in greater detail and understand how the Onshore Substation and its associated land requirements can coexist with the wider estate and have offered several meetings to do so.</p>
RR-082.12	<p>11. The Estate has sought to engage constructively with Mona, but efforts have not been reciprocated. There has been a lack of consistency and transparency.</p>	<p>The Applicant and its land agents have sought to engage with the affected party. Since 2022 the Applicant has made numerous requests for meetings to discuss the project and the design. The Applicant has been granted a single meeting, held virtually, but no meaningful responses have been received outside of the examination phase.</p>

## 2.83 The Revd Canon Brian Mayne

Table 2.83: RR-083 – The Revd Canon Brian Mayne

Reference	Relevant Representation Comment	Applicant's response
RR-083.1	<p>The process hitherto has been heavily loaded against local residents who are materially affected by the proposals, and insufficient weight given to viable alternatives. I believe that the proposed scheme is being put forward simply on cost grounds and convenience with little or no detailed analysis of the massive and long term environmental destruction the scheme involves.</p>	<p>The Applicant is a responsible developer committed to operating as part of the North Wales community for many decades to come. The Applicant carried out a statutory consultation on the Preliminary Environmental Impact Report (PEIR) in 2023; this is a key part of the planning process, which the Applicant undertook to understand community views. The Applicant submitted a Consultation Report (APP-037) with its application that explained 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.</p> <p>The Applicant is committed to developing the Mona Offshore Wind Project in a way that is sensitive to the environment minimising effects wherever possible. Impacts have been carefully assessed and appropriate mitigation identified is secured through the draft DCO (C1 Draft Development Consent Order F03). A detailed analysis of alternatives examined is provided at Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (Document Reference: F1.4) – this demonstrates the process the Applicant followed in identifying suitable sites for the onshore elements of the Mona project with regard to environmental and other constraints.</p> <p>The National Policy Statements establish the policy need for new renewable energy generation. National Policy Statement EN3 identifies new offshore wind projects as a critical national priority infrastructure, for which there is an urgent need. The policy and legislative support for the scheme is set out in full in the Planning Statement (APP-186)</p>

## 2.84 The Traditional & Sustainable Commercial Fishing Association

Table 2.84: RR-084 – The Traditional & Sustainable Commercial Fishing Association

Reference	Relevant Representation Comment	Applicant's response
RR-084.1	<p>We are The Traditional &amp; Sustainable Commercial Fishing Association members. We fish up to twenty miles from any safe haven all along the north west England coast and North Wales coast. We have recently received a study from Cefas regarding the migration route of Sea Bass, we are concerned the construction of the wind farms will disrupted the migration route of sea bass in the areas we fish. This information was never available in the constitution of earlier wind farms in the area and we need to address these concerns asap.</p>	<p>Impacts to fish and shellfish, including those on migration and those on sea bass, are identified and assessed within section 3.9 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). 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. No impacts related to sea bass have been assessed to be significant in EIA terms as per Table 3.34 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055).</p> <p>More generally, the Applicant is working to facilitate co-existence with existing commercial fishing activity in and around the Mona Array Area and Mona Offshore Cable Corridor 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 (FLCP) is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline FLCP has been included with the Application (APP-199) and is secured under Schedule 14, Condition 18 of the Draft DCO (C1 Draft Development Consent Order F03) and is expected to be secured in the standalone marine licence.</p>

## 2.85 Virgin Media O2

Table 2.85: RR-085 – Virgin Media O2

Reference	Relevant Representation Comment	Applicant's response
RR-085.1	<p>Virgin Media owns and operates a subsea telecommunications cable that traverses the Mona development site. Due regard must be given to this cable during construction. There must be no impacts from the construction and operation of this development that will hinder the future operation and maintenance of this cable. Guidance issued by the European Subsea Cables Association must be adhered to.</p>	<p>The Applicant notes your response. The Sirius South telecommunications cable, owned and operated by Virgin Media, was identified as an existing asset in the Volume 2, Chapter 10: Other sea users of the Environmental Statement (APP-62), where it is noted under section 10.9.4 that <i>“Cable crossing and proximity agreements will be established with relevant cable operators, to minimise the potential for any impact in accordance with recognised industry good practice. These agreements will ensure close communication and planning between both parties to ensure disruption of activities is minimised”</i>.</p> <p>The Applicant and Virgin Media are engaging on crossing and proximity agreements which will be finalised post-consent, prior to commencement of construction.</p>



## 2.86 W L Evans

Table 2.86: RR-086 – W L Evans

Reference	Relevant Representation Comment	Applicant's response
RR-086.1	I want the opportunity to provide comments on the draft DCO, book of reference, environmental statement together with other documents and items.	The Applicant notes the representation and welcomes the comments on the documents listed once the interest has had an opportunity to review. The Applicant will continue engagement on the disturbance and consents required for the land occupied by W L Evans.

## 2.87 Walney (UK) Offshore Windfarms Limited

Table 2.87: RR-087 – Walney (UK) Offshore Windfarms Limited

Reference	Relevant Representation Comment	Applicant's response
RR-087.1	Walney (UK) Offshore Windfarms Limited owns the Walney 1 and 2 windfarms, an operational offshore windfarm with a s36 Electricity Act 1989 consent and relevant marine licences ("our Development"). Its proximity to Mona Offshore Wind Farm ("MOWF") can be seen in MOWF's Environmental Statement (the "ES") (F2.10 Figure 10.4 and Table 10.10).	The Applicant notes the response. Walney 1 and 2 Windfarms are a minimum of 34.1 km from Mona Offshore Wind Project as stated in Table 10.10 of Volume 2, Chapter 10: Other sea users (APP-062).
RR-087.2	Our Development does not object to the principle of MOWF. We do, however, wish to participate in the DCO Examination to make representations about the potential impacts on and interactions with our Development and, where appropriate, to secure appropriate mitigations. Concerns were previously highlighted to MOWF via a s48 consultation response and subsequent meeting. Our concerns as raised in the s48 response remain extant and we expect further meaningful engagement to seek to address the issues raised below and previously. We are open to addressing such matters within or outside the Examination process.	The Walney 1 and 2 windfarms are considered as part of the baseline in Volume 2, Chapter 10: Other sea users (APP-062) and have been considered in the cumulative screening for each topic where appropriate. Engagement has occurred with Walney Offshore Wind Farm Limited and will continue throughout the examination phase.
RR-087.3	Our Development expects to continue to operate and be maintained in the long-term. It may be upgraded and repowered in future, and will then be decommissioned. Co-existence with our Development must be considered and protected over the long-term – and the acceptability of cumulative and in-combination impacts – must be properly assessed taking into account each of the above stages of our Development's life. Our Development requires that its operations, consents (including conditions), and any stakeholder agreements entered into by it are unaffected by MOWF. Our Development's concerns include the following.	An impact assessment, including the potential impact on the possible reduction or restriction of other offshore energy activities as a result of the Mona Offshore Wind Project, is presented in Volume 2, Chapter 10: Other sea users (APP-062). The scope of potential impacts, as set out in Table 10.6 of Volume 2, Chapter 10: Other sea users (APP-062), has been developed in consultation with relevant statutory and non-statutory stakeholders throughout the pre-application phase, which included consideration of matters raised in the section 42 consultation response from Walney Offshore Wind Farm Limited. Potential impacts have been appropriately assessed in accordance with the process set out in Volume 1, Chapter 5: Environmental Impact Assessment methodology (APP-052). No impacts were assessed as being of significant adverse impacts in Environmental Impact Assessment (EIA) terms.  As set out in Table 10.16 of Volume 2, Chapter 10: Other sea users (APP-062) the Mona Offshore Wind Project has committed to continued consultation through the

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Reference	Relevant Representation Comment	Applicant's response
RR-087.4	<p>Issue one: The ES highlights potential significant impacts on wildlife features, including potential significant project-alone and in-combination impacts on marine mammals (F2.4). We are not convinced that the baseline and the predicted impacts are robust and align with our understanding of the local environment and we require to analyse this further. Future impacts of our Development, such as operation and maintenance, must be accounted for by MOWF and appropriate mechanisms must be put in place to facilitate co-existence and allow co-ordination to reduce potential cumulative or in-combination impacts.</p>	<p>life of the project, as required, with other offshore energy operators to minimise disruption to either party's operations and maximise coexistence.</p> <p>The Mona Offshore Wind Project has undertaken a robust assessment of potential impacts on marine wildlife informed by appropriate data sources from site specific surveys and detailed desktop studies, in accordance with relevant topic specific guidance. The assessment of potential impact to marine wildlife is presented four chapters: Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), Volume 2, Chapter 4: Marine mammals (APP-056) and Volume 2, Chapter 5: Offshore ornithology (APP-057).</p> <p>The evidence to inform the baseline and the approach to predicting effects on marine mammals were discussed and agreed through an Evidence Plan Process which included an Expert Working Group (EWG) for marine mammals as set out in section 4.5 of the Consultation Report (APP-037). To inform the Environmental Statement, site-specific surveys were undertaken, as agreed with the marine mammal EWG, across the Mona Array Area plus a buffer extending between 7 to 16.5 km. Further, and on advice from the marine mammal EWG, additional data sources and informative documents were identified post-scoping that were used to inform the baseline characterisation. All suggested data sources have been included in the baseline (Volume 6, Annex 4.1: Marine mammal technical report (APP-090)). The Applicant is therefore confident that the assessment of likely significant effects on marine mammals presented in Volume 2, Chapter 4: Marine mammals (APP-056) is based on the most scientifically robust evidence available and that sufficient precaution is built into the assessment. With respect to potential cumulative or in-combination effects, the assessment has considered all reasonably foreseeable (i.e. those with information in the public domain) projects, plans and activities.</p> <p>The Underwater sound management strategy (with Outline underwater sound management strategy included as part of the application, (APP-202)) will reduce the Mona Offshore Wind Project's contributions to the cumulative assessment, if required, post consent. Requirements for management measures and mitigation will be discussed in consultation with the licensing authority and statutory nature conservation bodies (SNCBs).</p> <p>As outlined in Volume 2, Chapter 10: Other sea users (APP-062) the Mona Offshore Wind Project has committed to consultation with other offshore energy operators to minimise disruption to either party's operations and maximise coexistence.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-087.5	Issue two: The ES highlights extensive impacts on shipping and navigation and commits to stakeholder engagement (F2.7 7.14.1.2-7.14.1.4). We require to be involved in such engagement to ensure that our consents, agreements, and operations are not adversely affected by MOWF.	<p>The Applicant notes that the Walney Offshore Wind Projects are located more than 15 nm to the north of the Mona Array Area. Walney Offshore Wind Farm Limited have been consulted as part of the Marine Navigation Engagement Forum (MNEF) and attended the hazard workshop as described within Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098).</p> <p>The Applicant has committed within Volume 2, Chapter 7: Shipping and navigation (APP-059) to continue engagement with all stakeholders through the Marine Navigation Engagement Forum (MNEF) which includes Ørsted and other offshore wind energy developers.</p>
RR-087.6	Issue Three: We believe that MOWF will adversely affect the energy yield of our Development. Due to the proximity outlined in the above-referenced figure and table, there is the potential for MOWF to interfere with wind speed or direction at our Development causing reduction in energy output. This requires to be properly assessed and appropriately mitigated / compensated.	<p>Volume 2, Chapter 10: Other sea users of the Environmental Statement (APP-062) considers offshore energy receptors, including offshore wind farms. Walney 1 and 2 windfarms are considered as part of the baseline (section 10.5.2.9–14) in this chapter.</p> <p>APP-062 sets out that NPS EN-3 (paragraph 2.8.44) recognises that offshore wind development will occur in or close to areas where there is other offshore infrastructure. The project boundary requirements in the Crown Estate's Round 4 Information Memorandum specified that no offshore wind projects could be located within 7.5 km of an existing offshore wind farm. As described in APP-062 section 10.5.4, Figure 10.4 and Table 10.10, there are no other operational offshore wind farms located within 7.5 km of the Mona Array Area and therefore the Mona Offshore Wind Project location adheres to the TCE siting criteria.</p> <p>As referenced in Volume 2, Chapter 10: Other sea users (APP-062), a recent study commissioned by TCE indicated that, for the non-site-specific scenarios modelled, potential wake effects level off with approximately 10 km separation between offshore wind farms, and for separations much larger than 20 km wake effects become vanishingly small (Frazer-Nash Consultancy Limited, 2023).</p> <p>The Mona Array Area has been reduced following the statutory pre-application consultation, as described in section 4.11.2 and Table 4.23 of Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (APP-051). This has increased the distance from the nearest existing operational wind farm by an additional 4.0 km, and also increased the distance from a number of other operational wind farms, thereby reducing the potential for wake effects. The distance between the Mona array area and Walney 1 and 2 windfarms is 35.4 km and 34.1 km respectively.</p>

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Reference	Relevant Representation Comment	Applicant's response
		<p>On the basis of the distances between the Mona Array Area and other operational wind farms, including the Walney 1 and 2 Windfarms, the potential for wake effects has been scoped out of further assessment of impact on other sea users.</p>

## 2.88 Walney Extension Limited

Table 2.88: RR-088 – Walney Extension Limited

Reference	Relevant Representation Comment	Applicant's response
RR-088.1	Walney Extension Limited owns the Walney Extension Windfarm comprising Walney 3 and 4, an operational offshore windfarm with a Development Consent Order (DCO) and relevant marine licences ("our Development"). Its proximity to Mona Offshore Wind Farm ("MOWF") can be seen in MOWF's Environmental Statement (the "ES") (F2.10 Figure 10.4 and Table 10.10).	The Applicant notes the response. Walney Extension Windfarm is a minimum of 30.7 km from Mona Offshore Wind Project as stated in Table 10.10 of Volume 2, Chapter 10: Other sea users (APP-062).
RR-088.2	Our Development does not object to the principle of MOWF. We do, however, wish to participate in the DCO Examination to make representations about the potential impacts on and interactions with our Development and, where appropriate, to secure appropriate mitigations. Concerns were previously highlighted to MOWF via a s48 consultation response and subsequent meeting. Our concerns as raised in the s48 response remain extant and we expect further meaningful engagement to seek to address the issues raised below and previously. We are open to addressing such matters within or outside the Examination process.	The Walney Extension Windfarm is considered as part of the baseline in Volume 2, Chapter 10: Other sea users (APP-062). The Walney Extension Windfarm has been considered in the cumulative screening for each topic where appropriate. Engagement has occurred with Walney Extension Limited and will continue throughout the examination phase.
RR-088.3	Our Development expects to continue to operate and be maintained in the long-term. It may be upgraded and repowered in future, and will then be decommissioned. Co-existence with our Development must be considered and protected over the long-term – and the acceptability of cumulative and in-combination impacts – must be properly assessed taking into account each of the above stages of our Development's life. Our Development requires that its operations, consents (including conditions), and any stakeholder agreements entered into by it are unaffected by MOWF. Our Development's concerns include the following.	<p>An impact assessment, including the potential impact on the possible reduction or restriction of other offshore energy activities as a result of the Mona Offshore Wind Project, is presented in Volume 2, Chapter 10: Other sea users (APP-062). The scope of potential impacts, as set out in Table 10.6 of Volume 2, Chapter 10: Other sea users (APP-062), has been developed in consultation with relevant statutory and non-statutory stakeholders throughout the pre-application phase, which included consideration of matters raised in the section 42 consultation response from Walney Extension Limited. Potential impacts have been appropriately assessed in accordance with the process set out in Volume 1, Chapter 5: Environmental Impact Assessment methodology (APP-052). No adverse impacts were assessed as significant in Environmental Impact Assessment (EIA) terms.</p> <p>As set out in Table 10.16 of Volume 2, Chapter 10: Other sea users (APP-062) the Mona Offshore Wind Project has committed to continued consultation through the</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-088.4	<p>Issue one: The ES highlights potential significant impacts on wildlife features, including potential significant project-alone and in-combination impacts on marine mammals (F2.4). We are not convinced that the baseline and the predicted impacts are robust and align with our understanding of the local environment and we require to analyse this further. Future impacts of our Development, such as operation and maintenance, must be accounted for by MOWF and appropriate mechanisms must be put in place to facilitate co-existence and allow co-ordination to reduce potential cumulative or in-combination impacts.</p>	<p>life of the project, as required, with other offshore energy operators to minimise disruption to either party's operations and maximise coexistence.</p> <p>The Mona Offshore Wind Project has undertaken a robust assessment of all potential impacts on marine wildlife informed by appropriate data sources from site specific surveys and detailed desktop studies, in accordance with relevant topic specific guidance. The assessment of potential impact to marine wildlife is presented four chapters: Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), Volume 2, Chapter 4: Marine mammals (APP-056) and Volume 2, Chapter 5: Offshore ornithology (APP-057).</p> <p>The evidence to inform the baseline and the approach to predicting effects on marine mammals were discussed and agreed through an Evidence Plan Process which included an Expert Working Group (EWG) for marine mammals as set out in section 4.5 of the Consultation Report (APP-037). To inform the Environmental Statement, site-specific surveys were undertaken, as agreed with the marine mammal EWG, across the Mona Array Area plus a buffer extending between 7 to 16.5 km. Further, and on advice, from the marine mammal EWG additional data sources and informative documents were identified post-scoping that were used to inform the baseline characterisation. All suggested data sources have been included in the baseline (Volume 6, Annex 4.1: Marine mammal technical report (APP-090)). The Applicant is therefore confident that the assessment of likely significant effects on marine mammals presented in Volume 2, Chapter 4: Marine mammals (APP-056) is based on the most scientifically robust evidence available and that sufficient precaution is built into the assessment. With respect to potential cumulative or in-combination effects, the assessment has considered all reasonably foreseeable (i.e. those with information in the public domain) projects, plans and activities.</p> <p>The Underwater sound management strategy (with Outline underwater sound management strategy included as part of the application, (APP-202)) will reduce the Mona Offshore Wind Project's contributions to the cumulative assessment, if required, post consent. Requirements for management measures and mitigation will be discussed in consultation with the licensing authority and statutory nature conservation bodies (SNCBs).</p> <p>As outlined in Volume 2, Chapter 10: Other sea users (APP-062) the Mona Offshore Wind Project has committed to consultation with other offshore energy operators to minimise disruption to either party's operations and maximise coexistence.</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-088.5	<p>Issue two: The ES highlights extensive impacts on shipping and navigation and commits to stakeholder engagement (F2.7 7.14.1.2-7.14.1.4). We require to be involved in such engagement to ensure that our consents, agreements, and operations are not adversely affected by MOWF.</p>	<p>The Applicant notes that the Walney Offshore Wind Projects are located more than 16 nm to the north of the Mona Array Area. Walney Extension Limited have been consulted as part of the Marine Navigation Engagement Forum (MNEF) and attended the hazard workshop, as set out in Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098).</p> <p>The Applicant has assessed the potential impacts of the Mona Offshore Wind Project on navigational risk for all marine users within the shipping and navigation study area within Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). It was concluded that all hazards, including collision with wind farm service vessels and allision with wind turbines operated by other developers, had been reduced to As Low As Reasonably Practicable (as per section 1.9.8 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098)).</p> <p>The Applicant has committed within Volume 2, Chapter 7: Shipping and navigation (APP-059) to continue engagement with all stakeholders through the Marine Navigation Engagement Forum (MNEF) which includes Ørsted and other offshore wind energy developers.</p>
RR-088.6	<p>Issue Three: We believe that MOWF will adversely affect the energy yield of our Development. Due to the proximity outlined in the above-referenced figure and table, there is the potential for MOWF to interfere with wind speed or direction at our Development causing reduction in energy output. This requires to be properly assessed and appropriately mitigated / compensated.</p>	<p>Volume 2, Chapter 10: Other sea users of the Environmental Statement (APP-062) considers offshore energy receptors, including offshore wind farms. Walney Extension Windfarm is considered as part of the baseline (section 10.5.2.9–14) in this chapter.</p> <p>APP-062 sets out that NPS EN-3 (paragraph 2.8.44) recognises that offshore wind development will occur in or close to areas where there is other offshore infrastructure. The project boundary requirements in the Crown Estate's Round 4 Information Memorandum specified that no offshore wind projects could be located within 7.5 km of an existing offshore wind farm. As described in APP-062 section 10.5.4, Figure 10.4 and Table 10.10, there are no other operational offshore wind farms located within 7.5 km of the Mona Array Area and therefore the Mona Offshore Wind Project location adheres to the TCE siting criteria.</p> <p>As referenced in Volume 2, Chapter 10: Other sea users (APP-062), a recent study commissioned by TCE indicated that, for the non-site-specific scenarios modelled, potential wake effects level off with approximately 10 km separation between offshore wind farms, and for separations much larger than 20 km wake effects become vanishingly small (Frazer-Nash Consultancy Limited, 2023).</p> <p>The Mona Array Area has been reduced following the statutory pre-application consultation, as described in section 4.11.2 and Table 4.23 of Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement</p>



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Reference	Relevant Representation Comment	Applicant's response
		<p>(APP-051). This has increased the distance from the nearest existing operational wind farm by an additional 4.0 km, and also increased the distance from a number of other operational wind farms, thereby reducing the potential for wake effects. The distance between the Mona array area and Walney Extension Windfarm is 30.7 km.</p> <p>On the basis of the distances between the Mona Array Area and other operational wind farms, including the Walney Extension Windfarm, the potential for wake effects has been scoped out of further assessment of impact on other sea users.</p>
RR-088.7	<p>Issue Four: Our Development has put in place appropriate mitigation in relation to potential impacts on the Warton Airfield Primary Surveillance Radar. We require assurance that MOWF will not adversely affect or increase the cost of such mitigation.</p>	<p>The Mona Offshore Wind Project has not had a technical objection in regard to the Primary Surveillance Radar (PSR) from the Ministry of Defence (MOD) Defence Infrastructure Organisation (DIO), who is responsible for Warton Aerodrome aeronautical/aviation safeguarding. No significant impacts to Warton Airfield PSR were identified in EIA terms in Volume 4, Chapter 1: Aviation and radar (APP-075). Thus, the Applicant has no reason to believe that the Mona Offshore Wind Project might adversely affect or increase the cost of the mitigation put in place by Walney Extension Ltd related to Warton Aerodrome PSR.</p>

## 2.89 West Coast Sea Products Ltd

Table 2.89: RR-089 – West Coast Sea Products Ltd

Reference	Relevant Representation Comment	Applicant's response
RR-089.1	Commercial fishing interest affected by the proposed project	<p>Noted. 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 to understand stakeholder requirements for co-existence 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 (APP-199), is secured through the deemed marine licence (Schedule 14 of the DCO, condition 18) and is expected to be secured in the separate marine licences. Mitigation and monitoring commitments are set out within the environmental statement chapters and the Mitigation and monitoring schedule (Document Reference APP-196).</p> <p>Enabling co-existence and indeed, co-location was a key aim underpinning the Applicant's commitments to not close the entire development area during construction, the scallop mitigation zone (SMZ) and the orientation and spacing of infrastructure. Fishing receptor groups will be able to continue fishing within parts of the Mona Array Area and Mona Offshore Cable Corridor during construction.. During the operations and maintenance phase, the measures adopted as part of the Mona Offshore Wind Project such as the SMZ, minimum infrastructure spacing of 1,400 m and roughly north-to-south alignment of wind turbine rows (as set out in APP-199), will provide the space for continued fishing within the Mona Array Area and the Mona Offshore Cable Corridor, and fishing vessels will be able to transit through these areas.</p>

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## 2.90 Ørsted Burbo (UK) Limited

Table 2.90: RR-090 – Ørsted Burbo (UK) Limited

Reference	Relevant Representation Comment	Applicant's response
RR-090.1	Ørsted Burbo (UK) Limited owns the Burbo Bank Wind Farm, an operational offshore windfarm with a s36 Electricity Act 1989 consent and relevant marine licences (“our Development”). Its proximity to Mona Offshore Wind Farm (“MOWF”) can be seen in MOWF’s Environmental Statement (the “ES”) (F2.10 Figure 10.4 and Table 10.10). Our Development does not object to the principle of MOWF. We do, however, wish to participate in the DCO Examination to make representations about the potential impacts on and interactions with our Development and, where appropriate, to secure appropriate mitigations.	The Applicant notes your response. Burbo Bank Wind Farm is a minimum of 40.3 km from Mona Offshore Wind Project as stated in Table 10.10 of Volume 2, Chapter 10: Other sea users (APP-062).
RR-090.2	Concerns were previously highlighted to MOWF via a s48 consultation response and subsequent meeting. Our concerns as raised in the s48 response remain extant and we expect further meaningful engagement to seek to address the issues raised below and previously. We are open to addressing such matters within or outside the Examination process.	The Burbo Bank Wind Farm is considered as part of the baseline in Volume 2, Chapter 10: Other sea users (APP-062) and has been considered in the cumulative screening for each topic where appropriate. Engagement has occurred with Ørsted Burbo (UK) Limited during the pre-application phase and will continue throughout the examination phase.
RR-090.3	Our Development expects to continue to operate and be maintained in the long-term. It may be upgraded and repowered in future, and will then be decommissioned. Co-existence with our Development must be considered and protected over the long-term – and the acceptability of cumulative and in-combination impacts – must be properly assessed taking into account each of the above stages of our Development’s life.	An impact assessment, including the potential impact on the possible reduction or restriction of other offshore energy activities as a result of the Mona Offshore Wind Project, is presented in Volume 2, Chapter 10: Other sea users (APP-062). The scope of potential impacts, as set out in Table 10.6 of Volume 2, Chapter 10: Other sea users (APP-062), has been developed in consultation with relevant statutory and non-statutory stakeholders throughout the pre-application phase, which included consideration of matters raised in the section 42 consultation response from Burbo Bank Extension Limited. Potential impacts have been appropriately assessed in accordance with the process set out in Volume 1, Chapter 5: Environmental Impact Assessment methodology (APP-052). No adverse impacts were assessed as significant in Environmental Impact Assessment (EIA) terms.  As set out in Table 10.16 of Volume 2, Chapter 10: Other sea users (APP-062) the Mona Offshore Wind Project has committed to continued consultation through

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Reference	Relevant Representation Comment	Applicant's response
		the life of the project, as required, with other offshore energy operators to minimise disruption to either party's operations and maximise coexistence.
RR-090.4	Our Development requires that its operations, consents (including conditions), and any stakeholder agreements entered into by it are unaffected by MOWF. Our Development's concerns include the following.	The Applicant notes your response.
RR-090.5	Issue one: The ES highlights potential significant impacts on wildlife features, including potential significant project-alone and in-combination impacts on marine mammals (F2.4). We are not convinced that the baseline and the predicted impacts are robust and align with our understanding of the local environment and we require to analyse this further. Future impacts of our Development, such as operation and maintenance, must be accounted for by MOWF and appropriate mechanisms must be put in place to facilitate co-existence and allow co-ordination to reduce potential cumulative or in-combination impacts.	<p>The Mona Offshore Wind Project has undertaken a robust assessment of potential impacts on marine wildlife informed by appropriate data sources from site specific surveys and detailed desktop studies, in accordance with relevant topic specific guidance. The assessment of potential impact to marine wildlife is presented four chapters: Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), Volume 2, Chapter 4: Marine mammals (APP-056) and Volume 2, Chapter 5: Offshore ornithology (APP-057).</p> <p>The evidence to inform the baseline and the approach to predicting effects on marine mammals were discussed and agreed through an Evidence Plan Process which included an Expert Working Group (EWG) for marine mammals as set out in section 4.5 of the Consultation Report (APP-037). To inform the Environmental Statement, site-specific surveys were undertaken, as agreed with the marine mammal EWG, across the Mona Array Area plus a buffer extending between 7 to 16.5 km. Further, and on advice from the marine mammal EWG, additional data sources and informative documents were identified post-scoping that were used to inform the baseline characterisation. All suggested data sources have been included in the baseline (Volume 6, Annex 4.1: Marine mammal technical report (APP-090)). The Applicant is therefore confident that the assessment of likely significant effects on marine mammals presented in Volume 2, Chapter 4: Marine mammals (APP-056) is based on the most scientifically robust evidence available and that sufficient precaution is built into the assessment. With respect to potential cumulative or in-combination effects, the assessment has considered all reasonably foreseeable (i.e. those with information in the public domain) projects, plans and activities.</p> <p>The Underwater sound management strategy (with Outline underwater sound management strategy included as part of the application, (APP-202)) will reduce the Mona Offshore Wind Project's contributions to the cumulative assessment, if required, post consent. Requirements for management measures and mitigation will be discussed in consultation with the licensing authority and statutory nature conservation bodies (SNCBs).</p>

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Reference	Relevant Representation Comment	Applicant's response
RR-090.6	<p>Issue two: The ES highlights extensive impacts on shipping and navigation and commits to stakeholder engagement (F2.7 7.14.1.2-7.14.1.4). We require to be involved in such engagement to ensure that our consents, agreements, and operations are not adversely affected by MOWF. The high concentration of allision risk created around our Development due to the “high density of traffic” and the “proximity of transit to existing offshore wind farms” is specifically referred to in the ES (F2.7 7.9.8.5), emphasising the need for further engagement to reduce risks.</p>	<p>As outlined in Volume 2, Chapter 10: Other sea users (APP-062) the Mona Offshore Wind Project has committed to consultation with other offshore energy operators to minimise disruption to either party's operations and maximise coexistence.</p> <p>The Applicant notes that Burbo Bank Wind Farm is located more than 21 nm to the southeast of the Mona Array Area. It should be noted that the reference in paragraph 7.9.8.5 within Volume 2, Chapter 7: Shipping and navigation (APP-059) refers to the existing baseline conditions with the Mona Offshore Wind Project accounting for no material change in the density of traffic or proximity of vessel transits to Burbo Bank Wind Farm.</p> <p>The Applicant has assessed the potential impacts of the Mona Offshore Wind Project on navigational risk for all marine users within the shipping and navigation study area within Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). It was concluded that all hazards, including collision with wind farm service vessels and allision with wind turbines operated by other developers, had been reduced to As Low As Reasonably Practicable (as per section 1.9.8 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098)).</p> <p>The Applicant has committed within Volume 2, Chapter 7: Shipping and navigation (APP-059) to continue engagement with all stakeholders through the Marine Navigation Engagement Forum (MNEF) which includes Ørsted and other offshore wind energy developers.</p>
RR-090.7	<p>Issue Three: We believe that MOWF will adversely affect the energy yield of our Development. Due to the proximity outlined in the above-referenced figure and table, there is the potential for MOWF to interfere with wind speed or direction at our Development causing reduction in energy output. This requires to be properly assessed and appropriately mitigated / compensated.</p>	<p>Volume 2, Chapter 10: Other sea users of the Environmental Statement (APP-062) considers offshore energy receptors, including offshore wind farms. Burbo Bank Wind Farm is considered as part of the baseline (section 10.5.2.9–14) in this chapter.</p> <p>APP-062 sets out that NPS EN-3 (paragraph 2.8.44) recognises that offshore wind development will occur in or close to areas where there is other offshore infrastructure. The project boundary requirements in the Crown Estate's Round 4 Information Memorandum specified that no offshore wind projects could be located within 7.5 km of an existing offshore wind farm. As described in APP-062 section 10.5.4, Figure 10.4 and Table 10.10, there are no other operational offshore wind farms located within 7.5 km of the Mona Array Area and therefore the Mona Offshore Wind Project location adheres to the TCE siting criteria.</p> <p>As referenced in Volume 2, Chapter 10: Other sea users (APP-062), a recent study commissioned by TCE indicated that, for the non-site-specific scenarios modelled, potential wake effects level off with approximately 10 km separation</p>

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		<p>between offshore wind farms, and for separations much larger than 20 km wake effects become vanishingly small (Frazer-Nash Consultancy Limited, 2023).</p> <p>The Mona Array Area has been reduced following the statutory pre-application consultation, as described in section 4.11.2 and Table 4.23 of Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (APP-051). This has increased the distance from the nearest existing operational wind farm by an additional 4.0 km, and also increased the distance from a number of other operational wind farms, thereby reducing the potential for wake effects. The distance between the Mona array area and Burbo Bank Wind Farm is 40.3 km.</p> <p>On the basis of the distances between the Mona Array Area and other operational wind farms, including the Burbo Bank Wind Farm, the potential for wake effects has been scoped out of further assessment of impact on other sea users.</p>

### **3 Response to Additional Submissions**

#### **3.1 Westmorland and Furness Council**

3.1.1.1 The Applicant notes that council have no comments on the proposals.

#### **3.2 Coal Authority**

3.2.1.1 The Applicant notes that the Authority has no comments on the proposals.

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