

MONA OFFSHORE WIND PROJECT

Mona and Natural Resource Wales (advisory) SLVIA SoCG

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Image of an offshore wind farm

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
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).
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.

Acronyms

Acronym	Description
AEol	Adverse Effects on Integrity
AONB	Area of Outstanding Natural Beauty
CRDV	Clwydian Range and Dee Valley
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ENP	Eryri National Park
EWG	Expert Working Group
ExA	Examining Authority
HRA	Habitats Regulations Assessment
IoA	Isle of Anglesey
ISAA	Information to Support Appropriate Assessment
LAT	Lowest astronomical tide
LSE	Likely Significant Effect
MDS	Maximum Design Scenario
MCZ	Marine Conservation Zone
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
NL	National Landscape
NRW (A)	Natural Resources Wales Advisory

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Acronym	Description
NRW (MLT)	Natural Resource Wales Marine Licensing Team
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
SAC	Special Area of Conservation
SLVIA	Seascape, Landscape and Visual Impact Assessment
SNCB	Statutory Nature Conservation Body
SoCG	Statement of Common Ground
SPA	Special Protection Area
ZOI	Zone of Influence

Units

Unit	Description
kV	Kilovolts

1 Initial Statement of Common Ground between Mona Offshore Wind Project and Natural Resources Wales Advisory – Seascape, landscape and visual

1.1 Introduction

1.1.1 Overview

1.1.1.1 This Initial Statement of Common Ground (SoCG) has been prepared between Mona Offshore Wind Limited (hereafter referred to as ‘the Applicant’) and Natural Resources Wales Advisory (‘NRW (A)’), together the parties. The SoCG sets out the areas of current agreement, disagreement and in that context, matters of ongoing discussion between the parties in relation to the proposed Development Consent Order (DCO) application for the Mona Offshore Wind Project.

1.1.1.2 The need for a SoCG between the Applicant and NRW is set out in section 1 of Appendix F of the Rule 6 letter issued by the Planning Inspectorate on 07 June 2024.

1.1.1.3 This document is intended to provide the Examining Authority (ExA) with an overview of the level of common ground between the parties. The SoCG will identify where agreement has been reached, where differences lie and the reasons for disagreement or outstanding matters and will facilitate further discussion between the parties. The SoCG will be updated during the Mona Offshore Wind Project Examination.

1.1.1.4 This SoCG relates to the seascape, landscape and visual impact assessment (SLVIA) aspects of the Mona Offshore Wind Project Application and is one of three SoCGs between the Applicant and NRW (A) which cover the following broad areas of the DCO application:

- Offshore
- Onshore
- SLVIA.

1.1.1.5 The three SoCGs should be read in conjunction with one another to clarify the Applicant and NRW (A)’s position on the DCO application as a whole. Topics which are covered in this SoCG are listed in section 1.1.2.7.

1.1.1.6 The Applicant has engaged with NRW (A) on these SoCGs for Deadline 1 however the Applicant and NRW (A) acknowledge that additional work is required on the SoCGs as the Examination progresses.

1.1.2 Mona Offshore Wind Project Elements under NRW’s Remit

1.1.2.1 NRW’s remit, as set out in the relevant representation (RR-011) is to pursue the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources. All elements of the Mona Offshore Wind Project may be relevant to NRW (A) in its function as statutory consultee, covering the offshore, intertidal and onshore works. These are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) of the Draft DCO (PDA-003).

1.1.2.2 In addition to being an interested party under the Planning Act 2008, NRW exercises functions under legislation including (but not limited to) the Environmental Permitting

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(England and Wales) Regulations 2016 (as amended), Conservation of Habitats and Species Regulations 2017 and the Marine and Coastal Access Act 2009.

- 1.1.2.3 NRW broadly has two main functions in relation to marine development:
- As a marine licencing authority (acting on behalf of the Welsh Ministers)
 - As an advisor and statutory consultee
- 1.1.2.4 NRW's role as a licensing authority and statutory consultee are independent to ensure appropriate functional separation between them.
- 1.1.2.5 For the avoidance of doubt, this SoCG relates solely to NRW's advice in its capacity as a statutory consultee and advisor. This SoCG does not include the view of NRW Marine Licensing Function.
- 1.1.2.6 This SoCG covers the onshore and offshore elements of the scheme, including the intertidal zone. In relation to the DCO regime, NRW (A) has engaged in the pre-application process, both through membership of the Expert Working Group (EWG) meetings via the Evidence Plan process, and through bi-lateral discussions pre- and post-application. Key consultation is presented in Table 1.2 and Table 1.3.
- 1.1.2.7 This SoCG covers the following technical topics of the Mona Offshore Wind Project application which are of relevance to NRW (A):
- Seascape and visual resources
 - Landscape and visual resources.

1.1.3 Overview of Mona Offshore Wind Project

- 1.1.3.1 The Applicant has submitted an application for a Development Consent Order under the Planning Act 2008 for the construction, operation and maintenance of the Mona Offshore Wind Project, a proposed offshore wind farm located in the east Irish Sea. The Mona Offshore Wind Project will include both offshore and onshore infrastructure and consist of:
- **Mona Array Area:** This is where up to 96 wind turbines with maximum blade tip height above LAT of 364 m, up to four Offshore Substation Platforms (OSPs), foundations (for both wind turbines and OSPs), up to 325 km of inter-array cables and up to 50 km of interconnector cables will be located
 - **Mona Offshore Cable Corridor and Access Areas:** The corridor located between the Mona Array Area and the landfall up to Mean High Water Springs (MHWS), in which up to 360 km of offshore export cables will be located and in which the intertidal access areas are located
 - **Intertidal access areas:** The area from MHWS to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities
 - **Landfall:** This is where the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling
 - **Mona Onshore Development Area:** The area in which the landfall, Mona Onshore Cable Corridor (maximum length of up to 15 km), Mona Onshore Substation, mitigation areas, temporary construction infrastructure (such as access roads and construction compounds), operational access to the Mona Onshore Substation and the 400 kV connection to National Grid infrastructure will be located

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- **Mona Onshore Substation:** This is where the new substation will be located, containing the components for transforming the power supplied from the offshore wind farm up to 400 kV
- **Mona 400 kV Grid Connection Cable Corridor:** The corridor from the Mona Onshore Substation to the National Grid substation with a maximum length of up to 1 km.

1.1.3.2 A description of the offshore and onshore components required for the construction, operation and maintenance and decommissioning phases of the Mona Offshore Wind Project is available in Volume 1, Chapter 3: Project Description (APP-050).

1.1.4 Approach to SoCG

1.1.4.1 This initial SoCG has been developed during the pre-examination phase and will be progressed during the examination phase of the Mona Offshore Wind Project. In accordance with discussions between the parties, the SoCG is focused on those issues raised by NRW (A) within its response to the Scoping Report, Section 42 consultation and as raised through the Evidence Plan Process that has underpinned the pre-application consultation between the parties. This initial SoCG also includes those issues raised by NRW (A) during the post-application phase (i.e. relevant representations and pre-examination meetings).

1.1.4.2 In accordance with discussions between the Applicant and NRW (A), the SoCG is focused on the topics listed in paragraph 1.1.2.7.

1.1.4.3 The structure of this SoCG is as follows:

- Section 1.1: Introduction
- Section 1.2: Summary of SoCG
- Section 1.3: Summary of consultation
- Section 1.4: Agreements log.

1.2 Summary of SoCG

1.2.1 Overview

1.2.1.1 This initial SoCG outlines the consultation that has taken place between the parties during the pre-application and post-application phase of the Mona Offshore Wind Project. The agreement logs present the position reached on 07 August 2024 (Deadline 1).

1.2.2 Summary of Those Matters Agreed, Ongoing Points of Discussion and those Matters Not Agreed

1.2.2.1 Table 1.1 provides a summary of those matters agreed, ongoing points of discussion or not agreed between the parties.

Table 1.1: Summary of areas agreed, ongoing points of discussion and not agreed between the parties.

Topic	Agreement status
Seascape and visual resources	Some matters not considered to be agreed between the parties. Some matters ongoing point under discussion. Some matters agreed.

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Topic	Agreement status
Landscape and visual resources	Some ongoing points under discussion, some matters not considered to be agreed - but not deemed material, some matters agreed.

1.3 Summary of consultation

1.3.1.1 Table 1.2 below provides a brief overview of the consultation undertaken by the Applicant with NRW during the pre-application (both statutory and non-statutory) phases of the Mona Offshore Wind Project. Table 1.3 below provides a summary of the consultation undertaken by the Applicant with NRW during the post-application phases of the Mona Offshore Wind Project. The consultation presented is not exhaustive but provide an indication of aspects of key discussions undertaken. All attendees at the meetings are provided in the Technical Engagement Plan (APP-041) and Consultation Report (APP-037) however, for the avoidance of doubt, this SoCG is limited to matters between NRW (A) and the Applicant.

1.3.1.2 This initial SoCG makes reference to other documents submitted with the Mona Offshore Wind Project application that set out, in greater detail, the discussions that have taken place between NRW (A) and the Applicant. These documents are:

- The Technical Engagement Plan (APP-041) and appendices (APP-042, APP-043, APP-044)
- The Consultation Report (APP-037) and appendices (APP-038, APP-039, APP-040)
- NRW’s Relevant Representation (RR-011)
- The Applicant’s response to NRW’s Relevant Representation at the Procedural Deadline (PDA-008 to PDA-019).

Table 1.2: Summary of key pre-application consultation with NRW.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
Scoping			
15 June 2022	Scoping Opinion	Statutory	<ul style="list-style-type: none"> • Issue of Scoping Opinion (APP-194)
Statutory (Section 42) consultation			
04 June 2023	Statutory consultation	Statutory	<ul style="list-style-type: none"> • Statutory consultation responses from NRW are presented in Consultation Report Appendices – Part 3 (D.25-F) (APP-040).
Evidence Plan steering group			
14 December 2021	Meeting	Non-statutory	<ul style="list-style-type: none"> • Introduce the cable route selection study • To procure high level feedback on the cable routing process • To identify any concerns.

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Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
20 July 2022	Meeting	Non-statutory	<ul style="list-style-type: none"> • Approach to cable route selection • Likely Significant Effect (LSE) screening methodology • Opportunities to discuss points from the Scoping Opinion.
14 February 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> • Habitats Regulations Assessment (HRA) Stage 1 Screening and Information to Support Appropriate Assessment (ISAA) methodology • Consultation on the Preliminary Environmental Information Report (PEIR) and building towards the SoCGs • Cable route site selection study updates • Engineering considerations towards Special Areas of Conservation (SACs).
29 June 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> • HRA Stage 1 Screening and ISAA methodology • Section 42 responses • Agreement logs.
17 October 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> • HRA Stage 1 Screening and ISAA methodology • Underwater Sound Management Strategy • Agreement logs.
Seascape, landscape and visual resources			
24 November 2022	Online meeting	Non-statutory	<ul style="list-style-type: none"> • Baseline characterisation (study area, indicative distances, baseline character) • Wind turbine layouts and viewpoint plan • Wirelines (discussion and agreement on 'worst case').
17 August 2023	Online meeting	Non-statutory	<ul style="list-style-type: none"> • Presenting the Design Review Report.
4 October 2023	Meeting (Onshore Ecology EWG 05)	Non-statutory	<ul style="list-style-type: none"> • Consultation on the substation design strategy • Landscape and ecology strategy • Factors that influenced design of the landscape and ecology strategy including existing vegetation, hedgerows and trees • Draft visualisations.
8 December 2023	Meeting (Onshore Ecology EWG 06)	Non-statutory	<ul style="list-style-type: none"> • Outline Landscape and Ecology Management Plan (APP-208) which confirmed that it will focus on retention and/ or enhancements of key boundary features at the Onshore Substation and additional planting.

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Table 1.3: Summary of post-application consultation with NRW.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
10 May 2024	Relevant representation	Statutory	<ul style="list-style-type: none"> • Provision of NRW's relevant representation.
05 July 2024	Meeting	Non-statutory	<ul style="list-style-type: none"> • Review of this initial statement of common ground
25 June 2024	Applicant's response to NRW's relevant representation	Statutory	<ul style="list-style-type: none"> • Provision of the Applicant's response to NRW's relevant representation at the Procedural Deadline (PDA-008 to PDA-019).

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1.4 Agreement log

1.4.1.1 This section of the SoCG sets out the level of agreement between the parties. For each matter the status is identified as being either agreed, not agreed, not agreed but no material impact or an ongoing point of discussion, according to the criteria set out in Table 1.4 below.

Table 1.4: Position definitions and colour coding.

Position and colour coding	Definition of position
Agreed	The matter is considered to be agreed between the parties.
Ongoing point of discussion	The matter is neither “agreed” or “not agreed” and is a matter where further discussion is required between the parties. For example, where additional clarification is being sought from either party.
Not agreed – but no material impact	The matter is not considered to be agreed between the parties, but is not deemed material. For example, the matter is not agreed however the outcome of the approach taken by either party does not result in a material impact on the assessment, assessment conclusions in either EIA or HRA terms.
Not agreed – material impact	The matter is not considered to be agreed between the parties. The outcome of the approach taken by either party is considered to result in a materially different outcome on the assessment conclusions.

1.4.1.2 Table 1.5 and Table 1.6 set out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.2).

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1.4.2 Seascape and visual resources

Table 1.5: Agreement Log between the parties on seascape and visual resources.

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
EIA				
NRW.SVR.1	Consultation	The Applicant has undertaken adequate consultation with NRW (A) on potential impacts on seascape and visual resources.	NRW (A) agrees that the Applicant has undertaken adequate consultation with NRW (A) on potential impacts on seascape and visual resources.	Agreed
NRW.SVR.2	Consultation	The EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on potential impacts on seascape and visual resources.	NRW (A) has concerns relating to SLVIA methodology, presentation of information, and omission of local landscape/seascape receptors have not been responded to. Refer to written representation for details.	Ongoing point of discussion
NRW.SVR.3	Policy and planning	The Application has identified and considered all plans and policies relevant to seascape and visual resources, within NRW (A)'s remit.	NRW (A) agrees that the Application has identified and considered all plans and policies relevant to seascape and visual resources, within NRW (A)'s remit.	Agreed
NRW.SVR.4	Scoping	Agreement to the scoping of impacts for the EIA for seascape and visual resources	NRW (A) consider detailed landscape and seascape receptors should have been scoped into the assessment as receptors. Refer to written representation for details.	Ongoing point of discussion
NRW.SVR.5	Baseline environment	Agreement on the baseline characterisation for seascape and visual resources	NRW (A) consider detailed landscape and seascape receptors should have been scoped into the assessment. Refer to written representation for details.	Ongoing point of discussion
NRW.SVR.6	Study area	The EIA study area is appropriate for the receptors and impacts assessed	NRW (A) agrees that the EIA study area is appropriate for the receptors and impacts assessed	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.SVR.7	Project design envelope	The EIA chapter as identified, described and assessed the maximum design scenario for the EIA.	NRW (A) seek clarification of whether it is technically feasible, for a combination of the maximum number of turbines from Maximum Design Scenario (MDS) Scenario 1 and the maximum turbine height from MDS Scenario 2 (i.e. 96 x 364 m tall turbines) to be constructed within the Array Area. If approved, these parameters will be listed on the DCO (Document Reference C1) (APP-023).	Ongoing point of discussion
NRW.SVR.8	Assessment methodology	The sensitivity of seascape and visual resources receptors has been correctly identified and sufficiently described within the EIA.	NRW (A) consider the sensitivity of a number of receptors has been underestimated and this has led to underestimation of effects on receptors, notably within the Isle of Anglesey National Landscape (IoA NL) and Eryri National Park (ENP). Refer to written representation for details.	Not agreed – material impact
NRW.SVR.9	Assessment methodology	Agreement on the approach to assessment methodology.	NRW (A) have concerns with the SLVIA methodology, most importantly, we do not agree with the threshold used (major or substantial) for effects to be considered significant. This threshold is too high. Refer to written representation for details.	Not agreed – material impact
NRW.SVR.10	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on seascape and visual receptors in EIA terms for the Mona Offshore Wind Project alone.	NRW (A) consider the Mona Array would cause: <ul style="list-style-type: none"> • Significant adverse effects on the views and visual amenity of people within the IoA NL and ENP. • Significant adverse effects on scenic and perceptual characteristics within the IoA NL, which also relate to identified special qualities of the IoA NL; • Effects on the IoA NL, ENP, and Clwydian Range and Dee Valley (CRDV) NL that are not significant, but nevertheless adverse. 	Not agreed – material impact

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.SVR.11	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant effects on seascape and visual receptors in EIA terms for the Mona Offshore Wind Project cumulatively with other projects and plans.	<p>NRW (A) consider the Mona Array in combination with other offshore wind turbine projects, most notably Awel y Mor, would cause:</p> <ul style="list-style-type: none"> • Significant adverse cumulative effects on visual receptors within the loA NL and ENP; and, • Significant adverse cumulative effects on scenic and perceptual characteristics within the loA NL and ENP, which also relate to identified special qualities of both Statutory Designated Landscapes. 	Not agreed – material impact
NRW.SVR.12	Mitigation and monitoring	The mitigation measures and conditions outlined in Volume 2, Chapter 8: Seascape and visual resources (APP-060) and the Mitigation and Monitoring schedule (APP-196) are appropriate and will ensure significant effects are avoided.	NRW (A) disagree. The only mitigation measure is for the turbines to be painted grey which is a standard measure and would not ensure significant effects are avoided in relation to the loA NL and ENP. The only measures that would be effective in reducing the harm on these landscapes and receptors within them, would be a reduction in the height of the turbines and/or increasing the distance between turbines in the Array and the aforementioned areas.	Not agreed – material impact

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1.4.3 Landscape and visual resources

Table 1.6: Agreement Log between the parties on landscape and visual resources.

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
EIA				
NRW.LVR.1	Consultation	The Applicant has undertaken adequate consultation with potential impacts on landscape and visual receptors.	NRW (A) agrees that the Applicant has undertaken adequate consultation with potential impacts on landscape and visual receptors.	Agreed
NRW.LVR.2	Consultation	The EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on landscape and visual receptors.	NRW (A) agrees that the EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on landscape and visual receptors.	Agreed
NRW.LVR.3	Policy and planning	The Application has identified and considered all plans and policies relevant to landscape and visual resources, within NRW (A)'s remit.	NRW (A) agrees that the Application has identified and considered all plans and policies relevant to landscape and visual resources, within NRW (A)'s remit.	Agreed
NRW.LVR.4	Baseline environment	Agreement on the baseline characterisation for landscape and visual resources.	NRW (A) agrees with the baseline characterisation for landscape and visual resources.	Agreed
NRW.LVR.5	Study area	The study area is appropriate for the impacts and receptors assessed.	NRW (A) agree with the 10 km study area used for the Onshore Substation. Source: NRW's section 42 response on 01 June 2023.	Agreed
NRW.LVR.6	Project design envelope	The EIA chapter as identified, described and assessed the maximum design scenario for the EIA.	NRW (A) agrees that the EIA chapter as identified, described and assessed the maximum design scenario for the EIA.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.LVR.7	Assessment methodology	The sensitivity of landscape and visual resources receptors has been correctly identified and sufficiently described within the EIA.	Refer to comments above and written representation for details. Status is orange because we do not consider the onshore substation would cause significant effects on receptors within Statutory Designated Landscapes. This does not discount the issues raised by NRW (A) having the potential to materially affect the assessment outcomes for receptors outside of designated landscapes.	Not agreed – but no material impact
NRW.LVR.8	Assessment methodology	Agreement on the approach to assessment methodology.	Refer to comments above and written representation for details. Status is orange because we do not consider the onshore substation would cause significant effects on receptors within Statutory Designated Landscapes. This does not discount the issues raised by NRW (A) having the potential to materially affect the assessment outcomes for receptors outside of designated landscapes.	Not agreed – but no material impact
NRW.LVR.9	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant landscape effects on the special qualities of designated landscapes, however significant landscape effects are predicted on the character of some undesignated landscapes.	NRW (A) agrees there will be no significant landscape effects on the special qualities of designated landscapes, however significant landscape effects are predicted on the character of some undesignated landscapes.	Agreed
NRW.LVR.10	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant visual effects on users of the National Trails and long-distance paths and people using local roads (with the exception of users of the local road at the base of Cefn Meiriadog). Potentially significant effects may arise at several close proximity visual receptors, however for the majority of visual receptors, there will be no significant visual effects.	NRW (A) agree that significant adverse effects on users of the Offa's Dyke Path National Trail are unlikely. Our comments relate to Statutory Designated Landscapes and therefore we have not commented on the effects of receptors outside of or unrelated to these designations.	Ongoing point for discussion
NRW.LVR.11	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant cumulate effects on landscape and seascape character or on people's views or visual amenity.	In relation to viewpoints within the CRDV NL we continue to recommend that the Awel y Mor substation be identified in a cumulative visualisation so that the potential cumulative effects, including on users of the Offa's Dyke Path National Trail, are better understood.	Ongoing point for discussion

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.LVR.12	Mitigation and monitoring	The mitigation measures and conditions outlined in Volume 3, Chapter 6: Landscape and visual resources (APP-069) and the Mitigation and Monitoring schedule (APP-196) are appropriate and will ensure significant effects are avoided.	In so far as they relate to receptors within Statutory Designated Landscapes.	Agreed
Other Documents and Plans				
NRW.LVR.13	Outline Management Plans	The measures set out in the Outline Landscape and Ecology Management Plan (APP-208) and the accompanying landscape appendices are appropriate for the DCO application.	NRW (A) agree with the principles set out in the Outline Landscape and Ecology Management Plan and agree that the final Landscape and Ecology Management Plan will be agreed with the relevant planning authority. NRW (A) consider that amendments to the Outline Landscape and Ecology Management Plan are required to ensure that the final Landscape and Ecology Management Plan is based on a more robust Outline Landscape and Ecology Management Plan. Source: NRW's Relevant Representation (RR-011)	Ongoing point for discussion