Partners in UK offshore wind

MONA OFFSHORE WIND PROJECT

Response to Written Submissions made at Procedural Deadline

Deadline: 1

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F01

Image of an offshore wind farm

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Appropriate Assessment	A step-wise procedure undertaken in accordance with Article 6(3) of the Habitats Directive, to determine the implications of a plan or project on a European site in view of the site's conservation objectives, where the plan or project is not directly connected with or necessary to the management of a European site but likely to have a significant effect thereon, either individually or in-combination with other plans or projects.
Bodelwyddan National Grid Substation	This is the Point of Interconnection (POI) selected by the National Grid for the Mona Offshore Wind Project.
Competent Authority	Regulation 6(1) defines competent authorities as "any Minister, government department, public or statutory undertaker, public body of any description or person holding a public office".
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,

Term	Meaning
	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 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.

Term	Meaning
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 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).

Term	Meaning
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.

Acronyms

Acronym	Description
AfL	Agreement for Lease
BEIS	Department for Business, Energy and Industrial Strategy
BNG	Biodiversity Net Gain
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
EWG	Expert Working Group
HVAC	High Voltage Alternating Current
IEF	Important Ecological Feature
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
NBB	Net Benefits for Biodiversity
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
SAC	Special Area of Conservation
SoCC	Statement of Community Consultation
SPA	Special Protection Area
TCE	The Crown Estate
WTW	Wildlife Trust Wales
TWT	The Wildlife Trusts

Units

Unit	Description
GW	Gigawatt
km	Kilometres
km^2	Kilometres squared
kV	Kilovolt
MW	Megawatt
nm	Nautical miles

1 RESPONSES TO WRITTEN SUBMISSIONS

1.1 Cefn Meiriadog Community Council

Table 1.1: PDA-037 and PDA-038 – Cefn Meiriadog Community Council

Reference	Written Submission Comment	Applicant's response
PDA-038.1	I am the Member of Cefn Meiriadog Community Council with responsibility for consideration of Infrastructure issues and confirm that on behalf of Cefn Meiriadog Community Council I should like to attend in person the Preliminary Meeting scheduled to take place 16 July, and the subsequent follow-up meetings scheduled for the following three days. On the basis of the documentation published regarding status in relation to the Examination, as well as being a Statutory Party, Cefn Meiriadog Community Council would like to become an Interested Party. I am attaching a brief document expressing the Community Council's views on how the application should be examined, the main thrust of which concerns the paramount importance to the future of the community of Cefn Meiriadog of the cumulative effects of proposed project being considered in their entirety and in relation to similar existing, ongoing and pending projects. I should like to represent the Community Council's views by speaking briefly at either one of the Issue Specific Hearings or the Open Floor Hearing, whichever is deemed most appropriate. I look forward to your confirmation on the above.	The Applicant notes your response and the points raised and supports the use of open floor hearings, issue specific hearings and compulsory acquisition hearings to examine the Mona DCO application
PDA-037.1	The main concern of Cefn Meiriadog Community Council is that the Examination should reflect the nature, scale and context of the application in relation to the community in which it is proposed to site it. Cefn Meiriadog is a very small rural community with a population of under 400 people, while the application is for the construction of a very large piece of infrastructure taking place in a situation of other projects of	The Applicant notes that 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,

Reference	Written Submission Comment	Applicant's response
	similar scale being constructed or proposed for that same very small rural area.	Chapter 2: Policy and legislative context of the Environmental Statement (APP-049). Reflecting this, and as set out in the Planning Statement (APP-186) National Policy Statement EN-1 confirms that the Mona offshore wind project is critical national priority infrastructure where government policy states (in paragraph 4.1.7) that the need case for this infrastructure will outweigh the residual effects in all but the most exceptional cases. In order to ensure the impacts of the various elements of the Mona project are minimised the Applicant undertook a rigorous and robust site selection process, including in relation to the proposed siting of the Mona Offshore Wind Project onshore substation. 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 location immediately south the National Grid Bodelwyddan substation is the appropriate option for the siting of the Mona Offshore Wind Project onshore substation. 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). This explains how the various constraints and locational sensitivities of the sites considered were taken into account in determining the location for the proposed onshore substation. Section 1.2.4 identifies the development considerations taken into account for the onshore substation BRAG assessment. Development considerations such as noise and vibration and landscape and visual consider proximity to nearby residential properties; and land use (including predictive Agricultural Land Classifications (ALC)) considered avoidance of residential properties and those land parcels that are identified as within ALC Grade 3a and above. Traffic and transport considered potential impacts on the wider highway network – including discounting onshore substation options that would require construction traffic to route through St. Asaph, thereby avoiding impacts on that community. Through the site selection process the Applicant considers it has minimised impacts on communities around the Bodelwyddan substation. Volume 3 of the Environmental Statement includes a cumulative effects assessment that takes into account the potential impact of the project alongside other onshore projects and plans, including foreseeable future activities. The Non-

Reference	Written Submission Comment	Applicant's response
		Technical Summary of the Environmental Statement (APP-047) provides an overview of the results of the Environmental Impact Assessment (EIA) for the Mona Offshore Wind Project alone and cumulatively with other projects.
PDA-037.2	(1) Even taken on its own, the large scale of the proposed substation and its associated infrastructure will have very substantial effects on the rural landscape, and therefore on the community living within it.	As explained above, 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. 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 where existing topography and opportunities for landscape planting assist in reducing the effect of the development. The Applicant is committed to ensuring the detailed design and landscape mitigation is as sensitive as possible to reduce impacts on the Cefn Meriadog community and local area. The Design Principles (APP-189) include recommendations on how to embed the onshore substation into the existing landscape, and potentially to also enhance the surrounding landscape. 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 3, Chapter 3: Onshore Ecology (APP-066) and Volume 3, Chapter 6: Landscape and Visual Resources (APP-069), and the mitigations proposed within. 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 landscape mitigation proposals in relation to integrating the onshore substation into the surrounding landscape. Section 6.17.3 of Volume 3, Chapter 6: Landscape and Visual Resources summarises the potential visual effects associated with the onshore substation and concludes that potentially significant impacts are limited to those in close proximity to the onshore substation where there are clear views. Such effects 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
PDA-037.3	(2) More importantly, however, it is not an exaggeration to say that the cumulative impacts of the Mona proposal taken with other existing, ongoing and pending developments may be considered a terminal threat to the community's essential character. This once overwhelmingly rural and agricultural character was and is the prime reason is residents have chosen to live here, many for generations. This has been turned upside down within little more than a decade, as with three existing large substations and five large-scale projects currently in development (Awel y Môr, Mona, National Grid extension, MaresConnect substation, St Asaph Solar Farm), the scale of the cumulative effect is something previously unimaginable for residents, especially since each development in turn, including Mona, is inevitably located in a progressively more highly visible location. The accompanying large pylons and gantries have a substantial and irreversible impact in themselves.	
PDA-037.4	(3) Proportionality, therefore, is key. Firstly, in terms of its essential rural character, loss of its agricultural land, and the size and density of its population, the scale of proposed and existing infrastructure, and in particular the scale of the Mona proposal, is wholly out of proportion to the community in which it is being sited. Secondly, and equally disproportionately, the community of Cefn Meiriadog is being made to bear the entire burden of the impact of these very major developments, where other communities remain unaffected or minimally affected by them. In summary, the cumulative effects of all the projects mentioned above falling on one community penalise Cefn Meiriadog in a highly disproportionate way.	

Reference	Written Submission Comment	Applicant's response
		208/3 adjacent to Coed Esgob (currently not publicly accessible) would not be significantly affected due to intervening vegetation which restricts views. 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, but these are from an elevated topographic position that is approximately 150m from the onshore substation. As a result, the road overlooks the catchment within which the onshore substation sits at a close proximity, creating viewpoints that are not replicated from other locations. 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 onshore infrastructure associated with the Mona Offshore Wind Farm. No additional, cumulative effects were judged to be significant on landscape and seascape character or on people's views or visual amenity. The Applicant notes that the "accompanying large pylons and gantries" are not associated with the Mona Offshore Wind Project and are associated with National Grid infrastructure. They are therefore not within the control or influence of the Applicant. 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 review the cumulative assessment and, if needed, provide an update.
PDA-037.5	(4) National Grid. There is concern that the decisions resulting in the overwhelming cumulative effects and highly disproportionate burden currently falling entirely on the single small community of Cefn Meiriadog are apparently taken by National Grid based on commercial considerations, with no discussion of or consultation on the implications for or impacts on the community of its decisions to require Mona and others to connect to Cefn Meiriadog/Bodelwyddan. It is to be hoped that the Examination looks at this aspect of the application.	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 NGESO. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation.

Reference	Written Submission Comment	Applicant's response
PDA-037.6	(5) A strategic approach to the siting of grid connection infrastructure facilities, access routes, congruence with existing built projects, substations, brownfield land where available, etc, is required if the community of Cefn Meiriadog is not to suffer from a profound change to its essential rural character and indeed to its existence given that the proposals will make it a less attractive place to live in, to send children to school in, and to spend leisure time in.	The Applicant has sought to engage DCC throughout the pre-application site selection process and through Expert Working Groups as the onshore ecology and landscape strategy for the onshore substation site has been developed. As set out above, 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. The Applicant is committed to ensuring the detailed design and landscape mitigation is as sensitive as possible to reduce impacts on the local Cefn Meriadog community. 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 landscape mitigation proposals in relation to integrating the onshore substation into the surrounding landscape. The Applicant has committed to developing (APP-189) a Design Guide post-consent to inform the final detailed design that is submitted to the relevant authorities for the discharge of relevant DCO Requirements.
PDA-037.7	It goes without saying that with the lack of a strategic and coordinated approach currently applying to Mona and other projects, mitigations such as additional landscaping, partial lowering/burial of substations, tree screening, etc., should be fundamental to each individual project, including this one. However Cefn Meiriadog Community Council requests that the application be examined in a way that fully reflects its potential to have very far-reaching and irreversible effects, as outlined above, on the residents of the small community having to host it, with a means of taking into account in particular the cumulative effects of the proposed project and their disproportionate burden on the community of Cefn Meiriadog. Martin Barlow Community Councillor 24/6/2024	

1.2 Conwy County Borough Council and Denbighshire County Council

Table 1.2: PDA-039 – Conwy County Borough Council and Denbighshire County Council

Reference	Written Submission Comment	Applicant's response
PDA-039.1	I formally write on behalf of Conwy County Borough Council and Denbighshire County Council. At present a lead officer has not been selected for the handling of the Nationally Significant Infrastructure Project (NSIP). Further correspondence will be forthcoming in due course regarding this.	The Applicant notes your response.
PDA-039.2	**Examination Procedure (Draft Examination Timetable)** Having reviewed the draft Examination Timetable it is noted that two Issue Specific Hearings and an Open Floor Hearing are to be held prior to Deadline 1 which requires the submission of Local Impact Reports (LIRs) from any Local Authorities, and any written representation. Given that the Examination will principally be a written process supplemented by hearings, it is requested that further explanation is provided regarding this scheduling. Accepting that any work upon LIRs would likely be well underway by the date of the proposed issue specific hearings, but not yet completed, more detail regarding the agenda topics for those hearings is requested. Previous NSIP schemes have provided further information regarding the decision to have any early Issue Specific Hearings at this stage.	The Applicant notes your response.
PDA-039.3	**Preliminary Meeting** Officer(s) representing Conwy County Borough Council and Denbighshire County Council will attend the Preliminary Meeting on Tuesday 16th July 2024 either virtually or in person. Officers request the opportunity to comment upon Items 3, 4 and 5 as set out in the Appendix A.	The Applicant notes your response.
PDA-039.4	**Issue Specific Hearings (16, 17 and 18 July 2024) & Open Floor Hearing (19 July 2024)**	The Applicant notes your response.

Reference	Written Submission Comment	Applicant's response
	Notwithstanding the above comments regarding uncertainty over the content of the hearings, it is requested that Conwy County Borough Council and Denbighshire County Council may participate. However, given the uncertainty of the content of the meetings due to a lack of agenda provided at this stage by the Examining Authority, progress of the LIR and resourcing in the respective Local Authorities, there may not be a representative in attendance at the Issues Specific Hearings or Open Floor Hearing that are scheduled to take place in July, however it is more likely that the respective Local Authorities will have representatives in attendance at the hearing sessions scheduled later in the year in October, should they take place. I trust that the above is helpful to the Examining Authority in preparation for the Examination of the Mona Offshore Wind Farm NSIP Development Consent Order Application.	

1.3 Welsh Government

Table 1.3: PDA-040 – Welsh Government

Reference	Written Submission Comment	Applicant's response
PDA-040.1	Dymunai Llywodraeth Cymru ddarparu ymateb polisi a fydd yn cynnwys nifer o elfennau polisi mae Llywodraeth Cymru yn gyfrifol amdanynt.ac hefyd mynychu'r archwiliad. The Welsh Government wishes to provide a policy response that will include a number of policy elements the Welsh Government is responsible for and also attend the examination. Yr ydym yn ymwybodol ein bod wedi methu'r dyddiad cyntaf a roddwyd ar gyfer derbyn ymatebion ac felly yn bwriadu darparu'r llythyr cyn gynted a phosibl fel fod materion polisi Llywodraeth Cymru yn medru cael eu hystyried. We are aware that we have missed the first date given for receiving responses and therefore intend to provide the letter as soon as possible so that Welsh Government policy issues can be considered.	The Applicant notes your response.

1.4 Natural England

Table 1.4: PDA-041 – Natural England

Reference	Written Submission Comment	Applicant's response
PDA-041.1	Please see attached Natural England's response to the Planning Inspectorates Rule 6 letter under the Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010 for the Mona Offshore Wind Project.	The Applicant notes Natural England's response.
PDA-041.2	Thank you for your consultation dated 07 June 2024. The following constitutes Natural England's formal statutory response to the Rule 6 Letter. Natural England have not registered as an Interested Party (IP) within the examination of the Mona Offshore Wind Farm Project.	The Applicant notes Natural England's response.
PDA-041.3	**Attendance of the Preliminary Meeting** Thank you for your invitation to the Preliminary Meeting on the 16th July 2024. We note that Natural England are not registered as an IP within the examination of Mona Offshore Wind Farm Project and therefore the ExA have invited us to the Preliminary Meeting as 'Other Persons'. Natural England can confirm we will not be attending, we hope this letter will suffice in providing our input into this meeting.	The Applicant notes Natural England's response.
PDA-041.4	**Statement of Common Ground (SoCG), Statement of Commonality of Statements of Common Ground (Statement of Commonality of SoCGs)** We note that in Appendix F of the Rule 6 letter, the ExA has requested the submission of SoCGs between the Applicant and Natural England. We are not registered as an IP and therefore Natural England do not currently plan on engaging with or submitting SoCGs for the Mona Offshore Wind Farm Project	The Applicant notes this position and is not progressing a Statement of Common Ground with Natural England, as set out in S_D1_7 Mona Statement of Commonality.
PDA-041.5	**Statutory Nature Conservation Body (SNCB) approach to Mona and Morgan OWF Examinations** Whilst not an IP for the Mona OWF Examination, given the proximity of the Mona and Morgan OWF (the latter being in	The Applicant notes Natural England's response and appreciates the aim of consistent advice.

Reference	Written Submission Comment	Applicant's response
	English waters) and the potential for cumulative effects, we are working closely with Natural Resources Wales (NRW) and the Joint Nature Conservation Committee (JNCC) to ensure integrated and consistent advice across both projects.	

1.5 Natural Resources Wales

Table 1.5: PDA-042 and PDA-043 - Natural Resources Wales

Reference	Written Submission Comment	Applicant's response
PDA-042.1	Cyfoeth Naturiol Cymru (CNC) / Natural Resources Wales (NRW) are writing in response to the Rule 6 letter that was issued on Friday 7 June 2024. Please find below NRW's position with regard the Preliminary Meeting (PM); Issue-Specific Hearings (ISH) 1 and 2, and the OpenFloor Hearings (OFH). Please note that this email highlights the positions of NRW Advisory (NRW (A)) as the Statutory Nature Conservation Body (SNCB) and NRW Marine Licensing Team (NRW (MLT)) as the Regulator. The position of both NRW functions (advisor and regulator) on the PM; ISHs, and OFHs is made clear within the body of the response.	The Applicant notes Natural Resources Wales' response.
PDA-042.2	The Preliminary Meeting NRW (A) and NRW MLT both wish to register as an attendee to the Preliminary Meeting being held on Tuesday July 16 2024. Both NRW (A) and NRW (MLT) will attend virtually.	The Applicant notes Natural Resources Wales' response.
PDA-042.3	Both NRW (A) and NRW MLT are in support of the timetable put forward by the Examining Authority (ExA) and of the initial assessment of principal issues. Neither NRW (A) or NRW (MLT) wish to raise any matters at the PM. As NRW does not wish to raise any matters at the PM, we will attend in an "observing only" capacity. However, we reserve our position if we consider it appropriate to respond to matters raised by other Interested Parties (IP).	The Applicant notes Natural Resources Wales' response.
PDA-042.4	Issue Specific Hearings 1 and 2 and the Open Floor Hearing NRW MLT NRW MLT wish to register as an attendee to ISH 1 on the afternoon of Tuesday 16 July 2024. Attendance will be	The Applicant notes Natural Resources Wales' response.

Reference	Written Submission Comment	Applicant's response
	virtual. Given the interactions between the deemed marine licence (dML) and the separate transmission assets marine licence (ML), NRW MLT anticipate participating in discussion on Agenda Item 4: The Approach to Marine Licensing. NRW MLT also wish to register attendance at ISH 2 on Wednesday 17 and Thursday 18 July 2024. Again, attendance will be virtual. As there are no matters arising specifically relating to Marine Licensing, we are happy to attend in an "observing only" function unless a question directly arises. NRW MLT do not consider it necessary to attend the OFH on Friday 19 July and therefore do not wish to register as an attendee.	
PDA-042.5	NRW (A) NRW (A) will not be registering to attend ISH 1 or ISH 2 on Tuesday 16 July, Wednesday 17 July and Thursday 18 July 2024, or the OFH on Friday 19 July 2024. Our decision to not attend the ISHs is due to the first set of hearings taking place prior to Deadline 1, specifically the deadline for receipt by the ExA of Written Representations (WRs) and Statements of Common Ground (SoCGs). NRW (A) consider that the time period in which the hearings are taking place is critical in terms of finalising WRs (including consideration of the Applicants response to our Relevant Representations (RR)) and SoCGs for submission into the examination. NRW's WR will form the main body of evidence to the examination of the case. Furthermore, we consider that NRW's RR were sufficiently detailed to inform the examination at this stage, and therefore, currently, we do not have further information to provide at either ISH. NRW (A) will consider its attendance at future hearings if necessary and appropriate, at that point in time.	The Applicant notes Natural Resources Wales' response.
PDA-042.6	Other Matters - Statements of Common Ground (SoCGs) with the Applicant. NRW (A) will continue to engage with the Applicant throughout examination to identify matters agreed and not agreed as far as possible. Nonetheless, we have taken the decision that we will only be reviewing the first and last	The Applicant confirms engagement with NRW on initial SoCGs submitted at Deadline 1 (S_D.1_12 Mona and Natural Resources Wales (advisory) Offshore SoCG, S_D1_13 Mona and Natural Resources Wales (advisory) Onshore SoCG and S_D1_14 Mona and Natural Resources Wales (advisory) SLVIA SoCG) and the approach regarding review of the first and final iteration. The Applicant will

Reference	Written Submission Comment	Applicant's response
	iterations of any SoCG with the Applicant – one towards the beginning of the process in its draft and initial form, and the final iteration where we will be able to reflect on progress made for all of the points of agreement / disagreement considered throughout the course of the examination, captured via the SoCGs.	engage with NRW throughout the examination to provide final SoCGs at Deadline 7.
PDA-042.7	This decision has been made in order to ensure that we are able to direct our focus on further written submissions, questions put forward to NRW (A) by the ExA, responses to other Interested Party submissions, responses required under Rule 17, and future hearings. We have discussed this approach with the Applicant who have confirmed their support to this approach.	
PDA-043.1	Please see below Cyfoeth Naturiol Cymru (CNC) / Natural Resources Wales (NRW) Advisory's suggested locations for site inspections, based on seascape and landscape impacts. These include locations which would have visibility of the offshore components and those with visibility of the onshore components.	The Applicant notes that the suggested viewpoints are publicly accessible and will not therefore be included in the Accompanied Site Inspection.
PDA-043.2	The locations are assessment Viewpoints within the Applicant's Seascape Landscape Visual Impact Assessments (SLVIA). They are examples of where the development would be visible from publicly accessible locations within Statutory Designated Landscapes in Wales, and therefore relate to our concerns regarding the impact of the proposals on these landscapes and the visual amenity of people.	
PDA-043.3	As per our Relevant Representations, our primary concerns relate to the impact on receptors within the Isle of Anglesey National Landscape and Eryri National Park, and therefore we recommend viewpoints within these landscapes are prioritised. For priority purposes, we have omitted Viewpoints 11, 52, 53, and 56 from our list of suggested	

Reference	Written Submission Comment	Applicant's response
	locations with visibility of offshore components because they are located beyond the 50km SLVIA study area.	
PDA-043.4	**Suggested locations with visibility of offshore components** The viewpoint references below relate to those set out in ES Volume 2 Chapter 8: Seascape and Visual Resources (Examination Document Reference: APP-060). For the location of these viewpoints, refer Figure A.4: Zone of Theoretical Visibility and representative viewpoint locations within the Mona 50 km SLVIA study area.	The Applicant notes that the suggested viewpoints are publicly accessible and will not therefore be included in the Accompanied Site Inspection.
PDA-043.5	We recommend a hard copy of the visualisations (Examination Document References: APP106 – APP 112) printed at the correct paper size is used when visiting these viewpoints. The figure references for the visualisations are provided in brackets below. Within the Isle of Anglesey National Landscape: Viewpoint 1: Mynydd y Garn trig point (Figures 1.1 - 1.2) Viewpoint 2: Llanlleiana Head (Figures 2.1 - 2.2) Viewpoint 3: Mynydd Eilian (Figures 3.1 - 3.2 and Figure 47) Viewpoint 4: Bwrdd Arthur trig point (Figures 4.1 - 4.2) Viewpoint 24: Bull Bay, Amlwch (Figures 20.1 - 20.2) Viewpoint 25: Moelfre Headland (Figures 21.1 - 21.2) Viewpoint 26: Yr Arwydd trig point, near Mynydd Bodafon (Figures 22.1 - 22.2) Viewpoint 28: Penmon Point (Figures 24.1 - 24.2 and Figure 56) Viewpoint 55: Trwyn Eilian (Point Lynas) (Figures 44.1 - 44.2) Viewpoint 57: Trwyn Cemlyn (Figures 46.1 - 46.2) Within Eryri National Park: Viewpoint 6: Carnedd Llewelyn (Figures 6.1 - 6.2 and Figure 48) Viewpoint 29: Base of Moel Wnion (Figures 25.1 - 25.2) Viewpoint 30: Garreg Fawr (Figures 26.1 - 26.2)	

Reference	Written Submission Comment	Applicant's response
	Viewpoint 31: Tal y Fan, summit (Figures 27.1 - 27.2) Viewpoint 32: Foel Lus, summit (Figures 28.1 - 28.2) Viewpoint 33: Conwy Mountain, summit (Figures 29.1 - 29.2) Within the Clwydian Range and Dee Valley National Landscape Viewpoint 10: Graig Fawr (Figures 10.1 - 10.2 and Figure 50) Viewpoint 39: Prestatyn Hillside, Offa's Dyke Path / public footpath 405/12 (Figures 35.1 - 35.2) Viewpoint 54: Bridleway north of Golden Grove (Figures 43.1 - 43.2)	
PDA-043.6	Suggested locations with visibility of onshore components The viewpoint references below relate to those set out in ES Volume 3, Chapter 6: Landscape and Visual Resources (Examination Document Reference: APP-069). For the location of these viewpoints, refer Figure 6.4: Viewpoint Location Plan with Mona Onshore Substation zone of theoretical visibility.	
PDA-043.7	We recommend a hard copy of the visualisations (Examination Document References: APP158 – APP 159) printed at the correct paper size is used when visiting these viewpoints. The figure references for the visualisations are provided in brackets below. All of the locations below are within the Clwydian Range and Dee Valley National Landscape. Viewpoint 11 – Offa's Dyke Path, south of Moel Maenefa (Figures 21 – 22) Viewpoint 12 – Offa's Dyke Path, south of Pen-y-Mynydd (Figures 23 – 24) Viewpoint 18 – Graig Fawr summit (Figures 35 – 36) Viewpoint 19 – Offa's Dyke Path / public footpath 405/12, Prestatyn hillside (Figures 37 – 38)	The Applicant notes that the suggested viewpoints are publicly accessible and will not therefore be included in the Accompanied Site Inspection.

1.6 The Office for Nuclear Regulation (ONR)

Table 1.6: PDA-044 – The Office for Nuclear Regulation (ONR)

Reference	Written Submission Comment	Applicant's response
PDA-044.1	Dear Sir/Madam, With regard to planning application EN010137 - Mona Offshore Windfarm National Infrastructure Project, ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site. You can find information concerning our Land Use Planning consultation process here: (http://www.onr.org.uk/land-use-planning.htm).	The Applicant notes your response.

1.7 Davis Meade Property Consultants

Table 1.7: PDA-045 – Davis Meade Property Consultants

Reference	Written Submission Comment	Applicant's response
PDA-045.1	We act as Agents in respect of a number of clients (being 'Affected Persons') for whom preliminary relevant representations have been individually lodged in capacity of interested parties. We would accordingly be grateful to be granted the opportunity to partake in the Issue Specific hearings scheduled for either Wednesday 17th or Thursday 18th July 2024. Please note, all our clients' properties are adversely affected by the Onshore proposals. Accordingly it would be most helpful if it would be possible to receive confirmation, please, of a more specific timetable detailing when Onshore matters are to be heard. Furthermore whilst writing we request to reserve the right, please, on behalf our clients (being currently 8 Affected Persons), to participate at a Compulsory Acquisition hearing (albeit as the writer will not be able to attend during week commencing 21st October we wonder whether it would be possible for the same to take place during week commencing 14th October ,2024?).	The Applicant notes your response.

1.8 GTC Pipelines Ltd

Table 1.8: PDA-046 - GTC Pipelines Ltd

Reference	Written Submission Comment	Applicant's response
PDA-046.1	Please take this email as a confirmation that GTC has no assets within the order limits of this search area and therefore no objections to your clients' proposals.	The Applicant notes your response.

1.9 Heneb - The Trust for Welsh Archaeology

Table 1.9: PDA-047 - Heneb - The Trust for Welsh Archaeology

Reference	Written Submission Comment	Applicant's response
PDA-047.1	Thank you for the Rules 4, 6, 9 and 13 letter of 7th June 2024. Appendix F of this letter lists both Heneb: Clwyd-Powys Archaeology and Heneb: Gwynedd Archaeology as parties with whom the applicant should provide Statements of Common Ground. Since these are regional branches of a single organisation (as of 1st April 2024), we would suggest that a single Statement of Common Ground encompassing both regions would be sensible, as any future submissions we would make would be combined.	The Applicant confirms engagement with Heneb: Clwyd-Powys Archaeology and Heneb: Gwynedd Archaeology on the initial SoCGs submitted at deadline 1 (S_D1_23) and has agreed to produce a single Statement of Common Ground encompassing both regions.

1.10 National Farmers' Union

Table 1.10: PDA-048 - National Farmers' Union

Reference	Written Submission Comment	Applicant's response
PDA-048.1	1 Introduction 1.1 These are the Outline Representations of the National Farmers Union ("NFU") to the application for a Development Consent Order by the Secretary of State identified as the Mona Offshore Wind Farm Projects order. 1.2 The objectives of the NFU are to champion farming in England and Wales and to provide professional representation and service to its members. 1.3 The matters raised in these Outline Representations are matters not only of concern to the farming owners and occupiers of agricultural land affected by this, but also of concern to, and raise points of principle that will affect, members of the NFU having farm holdings that may be affected by similar Offshore Wind Farm schemes.	The Applicant notes the response.
PDA-048.2	2. Consultation and Engagement 2.1 There was limited information coming forward about the proposed scheme from Dalcour Maclaren, BPs agents and NFU members were raising concerns with their local NFU agents due to this, issues were raised with the NFU head office. The NFU requested a meeting for all landowners affected by the scheme to hear details from Dalcour Maclaren about the description of the scheme this was offered and took place on 9th November 2023. This meeting was helpful and informative for landowners but Dalcour Maclaren have offered no further meetings to speak to landowners on practical matters including details on impacts to field drainage, the depth of the cables, impact on the soils and how soil will be reinstated, explanation about link boxes, crossing of the cable route when being constructed, construction of haul roads, road crossing HDD workings, noise impact on dairy cows, and dust impact.	Dalcour Maclaren ("DM") on behalf of the Applicant has been seeking engagement with affected parties and the associated land interests since March 2022. The Applicant has consulted with the parties through the non-statutory consultation in June to August 2022 and September to November 2022, and then further through the Statutory consultation in April 2023. Alongside this, DM on behalf of the Applicant has continued individual engagement through meetings relating to the scheme development, surveys and subsequent intrusive works to aid design. Throughout the above timeframe, the Applicant has sought to meet with the affected parties and has been liaising with their respective appointed land agents on matters relating to both land agreements and practical matters that have been raised as concerns by those landowners relating to the construction and operation of the project. DM, on behalf of the Applicant held a landowner specific briefing in November 2023 whereby parties were invited to have open conversations and ask questions relating to the scheme which was well attended by affected parties and their representatives. Through the design of the project and engagement with landowners the Applicant has sought to reduce the overall land take requirements. It has sought to mitigate the impact on landowners by limiting the land take required for construction but at

Reference	Written Submission Comment	Applicant's response
		the same time ensuring enough space and flexibility is retained ahead of detailed design to ensure the most appropriate construction practices can be employed to further mitigate impacts on land and expedite construction. This aligns with industry best practice across major infrastructure development with regard to land take.
PDA-048.3	In regard to voluntary agreements Dalcour Maclaren did send out some draft Heads of Terms (HoTs) back in September 2023 but negotiations didn't really start on the HoTs until the NFU and agents acting had a meeting in December to discuss the HoTS. The agents acting include, Rostons Ltd, Davis Meade Property Consultants, Clough & Co, Wilson Fearnall Ltd, J Bradburne Price & Co and Jackson-Stops.	In September of 2023 'Generic' Heads of Terms for option agreements (HoTs) were shared around those land agents who had been instructed by affected parties. Dialogue to negotiate these terms was requested but this did not commence until the early part of 2024 with some agents, however other agents did progress those negotiations. DM have held one-to-one meetings with individual land agents representing affected parties to progress these agreements. Some of the land agents requested the NFU be brought into discussions and have subsequently formed a Land Interest Group (LIG) led by Louise Staples of the NFU. This group has negotiated as a collective, and as such DM have held two full day meetings with them as a group, hosted by the Applicant, to progress the HoTs which has led to the recent issue of version 8 of the generic terms. Whilst the Applicant has been happy to engage with the group as a whole, it reached a position where the generic terms were as advanced as appropriate and have since issued populated terms to the individual land agents to present to their clients and seek site specific negotiations and refinements. DM have held meetings with many of those individual land agents and their clients in June and early July and will continue to do so to finalise agreements. To date the Applicant has concluded 3 sets of HoTs. DM are at advanced stage of negotiation with 32 parties and are hopeful to conclude the agreements on the HoTs with these parties in the coming months with a view to progressing legally binding option agreements by the end of the examination.
PDA-048.4	A meeting was requested on 8th December to discuss the HoTs with DM and some of the issues and comments were raised with DM on 15th December on Teams and after a request two meetings were held in person to discuss the HoTs on 22nd January and the 7th February 2024. Further requests were made to DM for an in person meeting to try to agree outstanding issues, but this was not forthcoming and so the NFU then raised concerns direct to BP and again requested a meeting with BP and DM to try to negotiate the outstanding terms. BP did respond but only to request that the NFU and agents submitted a table with all outstanding	Since the initial in person meetings, DM and the Applicant met with the NFU and LIG group on the 12 July and 29 July 2024, to further progress heads of terms negotiations for the land rights sought. Another meeting has also been arranged on the 12 August to further progress these. In addition to these meetings, negotiation with affected parties has been ongoing through email, telephone correspondence and face to face meetings.

Reference	Written Submission Comment	Applicant's response
	issues. A table was submitted on 20th May 2024 and a response was received on 30th May but hardly any of the outstanding issues had been agreed by BP with BP not willing to change their position. The changes to terms and information requested in the table are nearly all standard requested terms which have been agreed on other offshore wind farm NSIP schemes.	
PDA-048.5	NFU and agents have been requesting an in-person meeting to try to negotiate these outstanding terms and finalise the HoTs but this has not been forthcoming. BP has not responded to the NFU at all since the one and only email received on 15th May 2024 and DM replied to the NFU and agents on 5th June 2024 just stating that the populated terms sent out on 30th May 2024 was BPs final position.	
PDA-048.6	The NFU and agents acting believe that BP are not carrying out meaningful negotiations to reach a voluntary agreement. The NFU from working on numerous other NSIP offshore wind projects has seen far more engagement from the developers in question.	
PDA-048.7	The NFU and agents would still like to have an in-person meeting to try to negotiate and finalise a generic set of HoTs.	
PDA-048.8	The NFU and agents acting for clients and members are yet to see a voluntary option agreement but hopefully this will be forthcoming once the HoTs are agreed.	The Applicant can confirm that a draft Option Agreement will be issued once Heads of Terms are agreed.
PDA-048.9	3.0 Compulsory Acquisition and Compelling Case Requirement 3.1 The DCO will contain powers to acquire compulsorily so much of the Order land as is required for the authorised development, or to facilitate or is incidental to it.	The Applicant is seeking powers of compulsory acquisition through its development consent order. These powers are to protect the delivery of the project and their inclusion is industry standard. Whilst these powers are being sought, the Applicant is committed to reaching voluntary agreements where possible with all interested parties and has been negotiating the voluntary heads of terms since September 2023 as set out above. The Applicant believes it has met and surpassed the threshold of reasonable and meaningful negotiations however, it is committed to and is actively continuing its negotiations with all affected parties to reach voluntary agreements. The Statement of Reasons (APP-029) demonstrates
PDA-048.10	3.2 Further, the guidance as to negotiations either before or parallel with formal processes may well give rise to a "legitimate expectation" that such will occur, and a failure to conduct such negotiations deprives landowners of the benefit that negotiations may have brought, especially in	

Reference	Written Submission Comment	Applicant's response
	relation to the where different locations and lesser rights might have been achieved.	that there is a compelling case in the public interest for the land to be acquired compulsorily if necessary.
PDA-048.11	3.3 The NFU and the land agents LIG believe that no meaningful negotiations have taken place alongside the formal procedures for compulsory purchase. Therefore, a compelling case cannot be made.	
PDA-048.12	4.0 Term 4.1 A term is being sought in perpetuity and agreement has not been reached with BP on this as on other NSIP offshore wind farm schemes to a term of 99 years. The NFU has been given no reason as to why the Mona Offshore Wind Farm Scheme needs to be in perpetuity.	The Applicant is seeking an easement in perpetuity which is a standard position within the industry and aligns with powers being sought in the draft DCO.
PDA-048.13	5.0 Cables and Ducting 5.1 The NFU would like to see cables with a minimum depth of 1.2m to the top of the tile. BP are only prepared to give a minimum depth of 1.2m to the top of the cable duct. We do understand that there may be engineering reasons for the cable/ducting to go deeper or shallower but a request has been made to see a detailed plan/cross section of the trench/ducting but this has still not been provided.	Volume 1, Chapter 3: Project description (APP-050) sets out that the onshore cables will be buried to a minimum depth of 1.2 metres to the top of the cable ducting where possible. It should be noted that this is 225mm deeper than industry standard guidelines set out in Energy Networks Association, Engineering Recommendation G57, issue 2 2019 which stipulates at least 0.9 metres of depth to the protection tile for transmission assets in good agricultural land. The general working practices in the area for agricultural operations would not exceed 0.6m in depth, except in particular circumstances which the Applicant will discuss with individual landowners, and so the minimum depth of 1.2m to the top of the cable duct is considered appropriate. An Indicative Onshore Cable Corridor Cross Section has been provided in S_D1_5.6 Appendix to Response to Hearing Action Point: Indicative onshore cable corridor cross section and trenchless crossing technique long-section.
PDA-048.14	Where cables are laid at a shallower depth due to engineering reasons landowners and occupiers must be provided with a plan to highlight where the cable is shallower as this will impact day to day agricultural operations.	
PDA-048.15	6. Jointing bays and Link Boxes 6.1 There is still great concern over the design and siting of link boxes/ancillary apparatus. Details regarding the link boxes including the size and design is lacking. Drawings have been requested but have not been forthcoming we have only been told that there is an indicative design in the Project Description document and that that further design information will not be available until the construction team are on board.	The points raised by the NFU regarding siting of the joint bay and the link boxes are noted. As explained at the ISH1 on 17 July, detailed design has not been undertaken and as a result the Applicant is not able to confirm the exact locations of this infrastructure. The Applicant will look to, where possible, maximise and optimise the cable lengths to ensure the siting of the joint bays is sensitive to land use at the time of installation and will install manhole covers at ground level.

Reference	Written Submission Comment	Applicant's response
PDA-048.16	Link boxes do normally stand proud above ground level and due to the number located on a linear scheme they can be parallel or staggered and so do greatly interfere with agricultural operations and are a hazard to farm machinery. It is 4 extremely important to have further design information on link boxes and the siting of them. The preference is that link boxes are located within field boundaries where possible, and BP must accept the interference they cause. Due to so many underground cable schemes coming forward there is now a greater understanding of the size of link boxes and the interference caused generally.	
PDA-048.17	7. Enabling Works 7.1 The NFU and agents have been requesting that no permanent/physical works take place before the main construction notice is served. As an example under Environmental Mitigation this must not include any tree planting for mitigation and that no trees on the route should be felled or lopped until consultation and agreement has been reached with landowners.	The Applicant is including the right to undertake onshore site preparation works in its Heads of Terms. These works are proposed to ensure works can be undertaken at the correct time of year ahead of main construction to the benefit of all parties. This practice is industry standard. The Applicant will seek to reduce impacts on farm holdings where possible to mitigate disturbance to farming practices.
PDA-048.18	8. Construction and Compound Notices 8.1 A 3 month written notice has been requested but BP are only willing to provide a 28 day written notice with a verbal 2 month prior notice. A 3 month written notice is now becoming the normal and this is the minimum time period acceptable for landowners and occupiers due to the scheme going through livestock farms. Each landowner and occupier is hoping that verbally they will know well in advance of 3 months before construction is going to start so that necessary on farm plans can be made.	The Applicant notes the comments made by the NFU regarding notification period and can confirm it has committed to the suggested three months' written notice within the HoTs. The Applicant will work with all affected parties to ensure the entry to land is done so in a collaborative way and to best mitigate impact to the environment, soil and the landowners operations.
PDA-048.19	9. Outline Code of Construction 9.1 The NFU has particular that it would like to see included in the outline code of construction/ environmental management plan which covers how practical on the ground matters are dealt with during and after construction. Wording covers the following: a. Agricultural Liaison Officer b. Records of Condition c. Biosecurity d. Irrigation e. Soil	The Applicant has set out in the documents listed below the details referred to in the NFU submission. The Applicant, at the request of landowners, has added further detail into the Heads of Terms but not to the full extent of the wording suggested by the NFU as further detail will be provided in the final plans once detailed design has been undertaken.

Reference	Written Submission Comment	Applicant's response
	Statement, Soil treatment and Soil Aftercare. f. Agricultural Land Drainage g. Agricultural Water Supplies	1. Agricultural Liaison Officer - Outline Soil Management Plan (APP-220) and Outline Code of Construction Practice (APP-212). 2. Records of Condition - reference to aftercare and handback to its pre works condition in the Outline Soil Management Plan (APP-219). 3. Biosecurity – details contained in Outline Biosecurity Protocol (APP-223). 4. Irrigation – has not been mentioned as there are no irrigation systems within the Order Limits. 5. Soil Statement, soil treatment, soil aftercare – details contained in the Outline Soil Management Plan (APP-220). 6. Agricultural Land Drainage – details contained in the Outline Construction Surface Water Drainage Plan (APP-218) and Outline Onshore Construction Method Statement (APP-227). 7. Agricultural Water Supplies - private water supplies are mentioned in the Outline Code of Construction Practice (APP-212).
PDA-048.20	9.2 The NFU and agents have been requesting for this wording to be included into the Voluntary HoTs and Option Agreement and as yet this has not been agreed.	
PDA-048.21	10. Access Routes to the Order Limits 10.1 Access routes to the construction strip are yet to be agreed with landowners and occupiers. This has been requested under the voluntary discussions.	Contrary to the point set out in the submission by the NFU, access routes are defined on the plans that have been circulated with the Heads of Terms, these are both for construction and of a temporary nature, and permanent rights required for operation and maintenance.
PDA-048.22	11. Discharge of Water 11.1 No details have been provided to landowners and occupiers on how any increase in surface run off of water from the haul road or the construction compounds will be dealt with during construction. Landowners and occupiers due to the very wet winter we have just had do not want to see discharge of water on to the land surface. Drains to be discharged into will also need to be agreed.	The Applicant has confirmed that all surface water can be managed within the Order Limits. The high-level principles are set out within the Outline Construction Surface Water Drainage Plan (APP-218) and refinement of this will be undertaken at detailed design in conjunction with landowners.
PDA-048.23	12. Reinstatement 12.1 The NFU and agents have been trying to agree the wording in the voluntary agreement discussions on 'Reinstatement' and have requested that reference is made to not only the record of condition that will take place before works start but also to the 'Soil Statement'. It is the soil statement which will record the condition of the soils before	The Outline Soil Management Plan (OSMP) (APP- 219) includes detail on how the project will manage soil handling throughout the course of the project. Prior to the removal of soil, paragraph 1.9.1.4 sets out that additional soil surveys will take place to measure the quality of the topsoil. This will then be used as a benchmark following completion of the works to ensure any post construction management can be identified and put in place.

Reference	Written Submission Comment	Applicant's response
	works start and so it is very important that this is referenced so the Soil Statement will be used to monitor reinstatement and aftercare of soils during the restoration operations.	The Agricultural Liaison Officer (ALO) would have access to soil management advice from a suitably qualified and experienced soil scientist or practitioner during soil handling operations to monitor and control the soil handling works. Paragraph 1.14 of the OSMP sets out the aftercare and handover to the landowner following completion of the works. A management plan would be agreed with the landowner and or occupier prior to the aftercare period which would include details on cultivations to be undertaken, seed mixtures to be used and soil samples to determine nutrient levels and requirements for lime and fertiliser application.
PDA-048.24	13. Field Drainage 13.1 At the present time the NFU and agents are looking for further detailed wording in regard to how field drainage will be dealt with pre and post construction. Detailed wording which the NFU has put forward has still not been agreed and this has been agreed on other NSIP schemes.	The Applicant has undertaken desktop drainage studies and is aware of varying systems in place across the project from dialogue with affected parties. During detailed design, the Applicant will ensure a full pre and post construction drainage plan is created in conjunction with the affected parties to ensure field drainage systems are maintained during and reinstated post works as set out in the Outline Construction Surface Water Drainage Plan (APP-218). These designs will be site specific and as such the Applicant does not consider it appropriate to include the wider requests by the NFU into the Heads of Terms documents. The Applicant has included high level commitments in the Heads of Terms pertaining to drainage.
PDA-048.25	14. Easement Width 14.1 The NFU and agents would like confirmation that the final easement width will be no greater than 30m.	The Applicant has been in dialogue with the affected parties, land agents and the NFU regarding the final easement width. As previously set out to the NFU and those other parties, the Applicant cannot confirm the final easement width at this time as this will be based on as-laid plans so as to accurately reflect the position of the cables and the land taken. The request by the NFU to limit this to 30m cannot be accommodated, however the Applicant has confirmed that the maximum easement width would not extend beyond the Order Limits. This is the market standard approach.
PDA-048.26	15. Request to Attend Hearings and make Representations 15.1 The NFU will if required lodge a full Written Representations in due course and requests to make oral representations at the issue specific hearings and the compulsory acquisition hearing or any other hearings which may be held on behalf NFU members which are directly affected by the proposed projects Louise Staples MRICS, FAAV NFU, Agriculture House, Stoneleigh Park, Stoneleigh Warwickshire, CV8 2TZ, DATED 25th June 2024.	The Applicant notes the response.

1.11 SP Energy Networks

Table 1.11: PDA-049 - SP Energy Networks

Reference	Written Submission Comment	Applicant's response
PDA-049.1	Please note the following comments on the above DCO application, on which we have had to date limited engagement from the applicant, including not being consulted at the s42 stage as a statutory consultee. As a statutory consultee with interests in the area affected by the proposed development, can you please register SP Energy Networks as an Interested Party.	The Applicant can confirm that both SP Manweb plc who own the assets and SP Energy Networks were included as a section 42 statutory consultee by way of a letter dated 17 April 2023. A virtual meeting was held between the Applicant and SP Manweb on the 5th February 2024 where an overview of the scheme was provided, and discussions were held on protective provisions, engineering matters, utility data, and the requirement for an electricity supply to the Mona Onshore Substation.
PDA-049.2	These comments are made by SP Energy Networks who operate and manage the electricity network up to 132kV on behalf of the licenced network operator, SP Manweb. SP Energy Networks must ensure the avoidance of any adverse impact on its assets as we all drive to maintain a network that is capable of meeting the increase in demand from an all-electric economy. The next decade will be crucial in preparing the grid for these changes and this is why we are very interested in being able to comment on the proposals which may undermine maintaining and developing a suitable future grid network. The proposed solar array development area affects SPM network as shown on the attached plan.	The Applicant notes your response and notes there is a reference to a 'solar array development area' which the Applicant does not recognise as part of this application.
PDA-049.3	SP Energy Networks requires measures in the draft DCO application to protect SP Manweb network assets and ensure safe working around the affected SPM network.	The Applicant has included bespoke protective provisions for the protection of SP Manweb within Schedule 10, Part 4 of the draft development consent order (PDA-003) (Draft DCO) for the benefit of SP Manweb, which were provided to them on 31 January 2024. The Applicant welcomes further engagement on these provisions.
PDA-049.4	At this stage, it is suggested the application plans include a plan showing this network and an assessment of the impact of the proposals on this network. There should also be a draft construction management plan which has a section on utilities and explains how impacts on the existing network is to be managed and mitigated. SP Energy Networks is	The Applicant refers to the Onshore Crossing Schedule F5.4.3_Mona_ES_Onshore Crossing Schedule F02 which sets out the location of the crossing points between Mona's onshore cable with the Order Limits and SP Manweb's assets.

Reference	Written Submission Comment	Applicant's response
	seeking to obtain from the applicant detailed plans showing where the underground cabling is in relation to the existing SPM assets. The current position is that SP Energy Networks has asked the applicant to provide an overlay plan showing SPM assets and the proposed DCO limits. which seems the clearest way of showing these crossover points with a schedule explaining what the crossover is.	The protective provisions for the benefit of SP Manweb in the Draft DCO offer protection for SP Manweb's. Detailed design has not yet been undertaken, so it is not possible to show the precise location of the underground cabling in relation to existing SP Manweb assets.
PDA-049.5	Following receipt of suitable overlay plans, SP Energy Networks can work with the applicant on protective provisions to ensure any impacts arising during construction and operations which directly affect the network or are in close proximity do not undermine the safe operation of this network. Until the protective provisions are drafted and discussed and agreed with SP Energy Networks, then objection is raised to there being no provision in the application to such measures.	Overlay plans were provided to SP Manweb on the 18 June 2024. The Applicant provided SP Manweb with the draft protective provisions on the 31 January 2024 and are awaiting a response.
PDA-049.6	The applicant's assistance with this would help progress this matter. SP Energy Networks would like to resolve matters as much as possible and would like to see clarification on the crossover points/SPM assets as soon as further details can be provided.	The Applicant has provided the relevant information to SP Manweb and is awaiting a response and follow up decision.
PDA-049.7	Mitigation proposals will also need to take account of SPM assets and the operational requirements.	The Applicant notes the response.
PDA-049.8	There are a number of key areas to resolve in relation to SPM network, which is critical to protect as it is this network that will be relied upon to distribute the generation into local homes and businesses. Any adverse impacts on the SPM network that need to be resolved by SPM would impact on the benefits of delivering this proposed scheme. The applicant should discuss the above with SP Energy Networks as soon as possible. Given the extent of the information prepared and submitted, it is a reasonable expectation for there to be a plan produced showing the SPM asset as likely to be most affected and how, and an SPM network diversions worksheet that outlines how this network will be managed within the proposed development.	The Applicant notes the response and understand that SP Manweb's concerns can be addressed through the agreement of protective provisions. The Applicant provided SP Manweb with the draft protective provisions on the 31 January 2024 and are awaiting a response.

Reference	Written Submission Comment	Applicant's response
PDA-049.9	SP Energy Networks will continue to review the application and may wish to raise further matters in due course and welcomes further engagement with the applicant.	The Applicant notes the response and looks forward to further engagement.

1.12 Wildlife Trust Wales

Table 1.12: PDA-050 - Wildlife Trust Wales

Reference	Written Submission Comment	Applicant's response
PDA-050.1	To Whom it may Concern, I would like the attached document to be included as written representation on behalf of the Wildlife Trust (Wales) and North Wales Wildlife Trust. The document was submitted to the developer in June 2023 regarding the Trusts position and concerns regarding the project. Having engaged with the projects environmental working group since its inception, and contributed to the Mona OWF agreements log, I assumed that the Trust was recognised as an interested party and that this document would be included as written representation. This assumption has today been highlighted as not so. I appreciate that this document was in response to the publication of the PEIR but the concerns remain extant particularly with regard to the impact of the export cable route and landfall.	The Applicant has engaged with the Wildlife Trust Wales (WTW) throughout the pre-application (see the Technical Engagement Plan (APP-041) for details of engagement) and pre-examination phase and welcomes their participation in the Examination.
PDA-050.2	I appreciate that the date for submission of such matters has passed, but hope that there is still an opportunity for these comments to be included for consideration. As I said I had made an assumption on inclusion based on previous experience responding to the Awel Y Mor OWF project. I appreciate your time with this matter and look forward to hearing from you in due course.	The Applicant notes the WTW's response.
PDA-050.3	Dear Sir/ Madam, Mona Offshore Wind Project: Wildlife Trust Wales response to the Preliminary Environmental Information Report Please find below on behalf of the Wildlife Trust Wales (WTW), the WTW Marine Planning Officer (Wales) response to the Spring 2023 consultation to the Mona Offshore Wind Farm (OWF) Preliminary Environmental Information Report (PEIR).	The Applicant notes that WTW has resubmitted their response to Section 42 consultation dated 04 June 2023, which has been presented in points PDA-050.3 to PDA-050.42. The Applicant has previously addressed WTW's response to Section 42 consultation and has provided this response in the Consultation Report Appendix D.25 (APP-040). As the WTW have stated that their concerns remain in PDA-050.1 above, the Applicant's responses to PDA-050.3 to PDA-050.42 presented herein have been updated from those provided in the Consultation Report (APP-040) in order to provide the WTW with further detail and clarification. The WTW participated in the Evidence Plan Process as detailed in the Technical Engagement Plan (APP-041). WTW attended the Benthic ecology, Fish and

Reference	Written Submission Comment	Applicant's response
		shellfish and Physical processes, Marine Mammal and Offshore Ornithology Expert Working Groups (EWGs). The North Wales Wildlife Trust were invited to participate in the onshore ecology and onshore and intertidal ornithology EWG meetings during the pre-application phase.
PDA-050.4	We welcome this opportunity to consult on the proposal at this early stage of its development. These comments are intended to be constructive, and WTW welcomes further engagement as the consenting process progresses to ensure that the development takes place using the right technology, in the right place and making a positive contribution to natures recovery at sea[1].	The applicant welcomed WTW's engagement throughout the Mona Offshore Wind project application phase and will continue to engage with WTW throughout the Examination phase.
PDA-050.5	The Royal Society of Wildlife Trusts (RSWT), which includes WTW, are a movement of 46 independent Wildlife Trusts covering the UK, 5 of which are located in Wales. RSWT is the largest UK voluntary organisation dedicated to conserving all the UK's habitats and species both in the terrestrial and marine space. Our seas need to be manged in order to enable them to recover from anthropogenic damage, and, create resilient ecosystems. This will ensure that the demands for resources and energy at the scale necessary to deliver the UK Governments ambitions can be met without deleterious environmental impact and disturbance to marine habitats and species.	The Applicant notes the WTW's response.
PDA-050.6	The Mona OWF development is of interest to the WTW because it is predominantly located in waters that the sustainable use of which are governed by policy set out in the Welsh National Marine Plan[2].	The Applicant considers the Mona Offshore Wind Project to be compliant with the Welsh National Marine Plan (WNMP). Natural Resources Wales' Relevant Representation (RR-011) stated that NRW consider that the proposed commitments made within the Biodiversity Benefit and Green Infrastructure Statement (APP-193) align with the WNMP Policy ENV-01 in relation to the resilience of marine ecosystems.
PDA-050.7	There is an opportunity for well-planned offshore wind development to protect the environment through the sensitive location and design of infrastructure. Implementation of appropriate mechanisms designed in collaboration with conservation organisations and statutory bodies responsible for the management of MPAs, to support and deliver enhancements for biodiversity and	The Applicant notes the WTW's response.

Reference	Written Submission Comment	Applicant's response
	improvements in the management and condition of these important sites and the features for which they are designated.	
PDA-050.8	WTW position on OWF developments We act to empower both our members and the wider community to engage impactfully with the development of marine energy solutions to ensure they are not only sustainable but deliver biodiversity net gain by incorporating mitigation measures which go further than the precautionary principle requires and take a strategic approach to compensation.	The Applicant notes the WTW's response.
PDA-050.9	Uncertainty surrounding potential OWF impacts means that even robust baseline environment information cannot comprehensively address all pre- construction, operation and decommissioning phase knowledge gaps. WTW endorse an entire life cycle Adaptive Management approach to OWF projects which, despite uncertainty, prevents unacceptable harm to the marine environment. This approach ensures that interactions with other users of the marine space are identified and managed for use-use conflicts and synergisms, ensuring the cumulative impact does not introduce a harm not scoped in when a use is viewed in isolation, and highlights opportunities for enhancement.	The Applicant notes the WTW's response.
PDA-050.10	WTW supports the development of offshore wind and other marine renewable energy projects which will play a part in delivering a resilient and decarbonised energy supply to limit climate change, but, this industrialisation of the seascape will have environmental impact and this must be strategically prevented, mitigated, and as a last resort, compensated for in order to ensure the recovery of this already degraded environment.	The Applicant notes the WTW's response.
PDA-050.11	The British Energy Security Strategy (BESS)[3] lays out a step change in the delivery of offshore wind through speeding up of consenting to the potentially weakening of the HRA process. Positives include establishing Environmental	The Applicant notes the WTW's response.

Reference	Written Submission Comment	Applicant's response
	Standards for offshore wind, a marine recovery fund and commitments to an Offshore Wind Environment Improvement Package (OWEIP)[4].	
PDA-050.12	The WTW advocates that projects such as Mona OWF deliver strategic compensation, and strategic marine environment monitoring throughout the life cycle of the OWF. Conform to at a minimum the OWF environmental standards/ nature-based design standards as proposed in BESS, and commit to deliver Biodiversity Net Gain (BNG). Comparative terrestrial projects are mandated by the Environment Act 2021 to deliver BNG. As OWF projects move progressively offshore and out of designated waters the developer should be required to demonstrate that the BNG measures undertaken have a positive impact on existing habitat and biodiversity, including no habitat loss and are location specific. It is important that intertidal, coastal and offshore measures are delivered where appropriate. Marine BNG should be proportional to the size and impact of the individual project, but ensure that the measures are mutually inclusive of other project BNG deliverables. This strategic approach will ensure a positive feedback loop to BNG.	The Mona Offshore Wind Project has committed to delivering a net benefit for biodiversity in accordance with Welsh Government's Approach to Net Benefits for Biodiversity and the DECCA Framework in Terrestrial Planning System (CIEEM, 2022), which is the equivalent of BNG for Welsh Projects. Onshore, intertidal and offshore biodiversity benefit opportunities for the Mona Offshore Wind Project are presented in the Biodiversity Benefit and Green Infrastructure Statement (APP-193). Onshore measures are outlined in Section 3.4 of the Biodiversity Benefit and Green Infrastructure Statement (APP-193). Further details, including how specific measures are secured, is provided in Volume 3, Chapter 3: Onshore ecology (APP-066) and Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-067). The Outline Landscape and Ecology Management Plan (APP-208) includes measures to mitigate impacts to onshore ecological and landscape receptors. Whilst there is currently no legislative requirement to deliver NBB in the offshore environment, the Applicant is exploring opportunities for intertidal and offshore NBB as presented in section 3.5 of the Biodiversity Benefit and Green Infrastructure Statement (APP-193). The Applicant will continue to explore these opportunities as the project design develops in collaboration with stakeholders post-consent. Mitigation and monitoring have been proposed according to the process outlined in Volume 1, Chapter 5: Environmental Impact Assessment Methodology (APP-052) and in accordance with the Planning Inspectorate Advice Note Seven: Environmental Impact Assessment: process, preliminary environmental information and environmental statements (Planning Inspectorate, 2020). Proposed monitoring and mitigation measures have been included in the application where there is potential for a residual significant effect. Monitoring and mitigation, including details of how they are secured, are detailed in the Mitigation and monitoring schedule (APP-196) and the Offshore In-principle monitoring plan (APP-201).
PDA-050.13	The WTW supports the rapid increase in MRE production to meet net zero, it presents a multiplier solution to address climate challenges, foster socio-economic growth and enhances energy security, but this cannot be at the expense	The Applicant notes the WTW's response.

Reference	Written Submission Comment	Applicant's response
	of the marine environment; the consequences of exceeding tipping points[5] in the marine system not yet understood.	
PDA-050.14	The evolving nature of the OWF industry should be driven by the pursuit of improvement in technology and construction methodologies to deliver sustainable development not a constant focus on cost reduction[6].	The Applicant notes the WTW's response.
PDA-050.15	To realise the potential contribution of OWF's to decarbonising the energy sector and helping to mitigate the worst impacts of climate change on society and nature, the OWF industry must also act to protect and support nature's recovery on land and at sea.	The Applicant notes the WTW's response.
PDA-050.16	Mona Array Area WTW understands that the benthic sub tidal ecology baseline and assessment of the maximum design scenario (MDS), which includes the Mona Array Area and the Mona Offshore Cable Corridor, as presented in the PIER is not all determined on site specific data collection.	Volume 6, Annex 2.1: Benthic subtidal and intertidal ecology technical report (APP-087) was updated for the application to include the results of the site-specific surveys undertaken in 2022 (and not therefore reported in the PEIR) within the Mona Offshore Cable Corridor, including within Constable Bank and the Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC. The results of these surveys (i.e. the Important Ecological Features (IEFs) identified) have been carried through to, and assessed fully in, Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054).
PDA-050.17	Baseline characterisation is required in accordance with the Infrastructure Planning (EIA) Regulations 2017. However, the baseline characterization should only be considered a 'snapshot' of the present benthic ecosystem.	The Applicant notes the WTW's response. The future baseline scenario for benthic subtidal and intertidal ecology was considered in the assessment, as detailed in section 2.5.5 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054).
PDA-050.18	A draft Information to Support Appropriate Assessment (ISAA); more commonly known as a Report to Inform Appropriate Assessment (RiAA), is provided alongside the PIER but a project-level Habitats Regulation Assessment (HRA)[7] has not. It is accepted that a plan level HRA was conducted by The Crown Estate (TCE) for the Leasing Round 4 Plan, and that a Project Level HRA should be conducted by the developer.	The Applicant has provided a HRA Stage 1 Screening Report (APP-034) and HRA Stage 2 ISAA part 1 (intro and background), part 2 (SAC assessments) and part 3 (SPA assessments) (APP-031, APP-032 and APP-033) for the Mona Offshore Wind Project with the DCO Application, which fulfils the requirements of the Habitats Regulations and provides the relevant information for the Competent Authority to undertake the Appropriate Assessment.
PDA-050.19	WTW accepts that the project description is indicative and refinement is to be expected in line with the Development Consent Order (DCO) process, but, the WTW encourages	The Applicant notes the WTW's response. As outlined in Volume 1, Chapter 3: Project description (APP-050), a number of MDSs have been refined from PEIR to application. Refinements for topics which are considered to be relevant to WTW

Reference	Written Submission Comment	Applicant's response
	pre-examination transparency with respect to receptor impacts identified under the MDS approach.	were discussed in the Evidence Plan Process as detailed in the Technical Engagement Plan (APP-041).
PDA-050.20	Geotechnical and geophysical survey information will be collected but at this time detailed knowledge of the pelagic and benthic environment is not known. Site investigation will reduce project risk by identifying opportunities and limitations in environmental constraints and impacts enabling a fit-for-purpose design which manages seabed and water column risk.	A summary of the site-specific geophysical and benthic surveys undertaken for the Mona Offshore Wind Project that have been used in the characterisation of the benthic subtidal ecology baseline are provided in section 1.7.2 of Volume 6, Annex 2.1: Benthic subtidal and intertidal ecology technical report (APP-087). The detailed design will be set out in the design plan post-consent. The design plan is secured in Schedule 14 Condition 18 of the draft DCO (and the separate NRW marine licence) and will be approved by the licencing authority before works commence.
PDA-050.21	The Mona Array represents ~450km2 area of potential benthic surface change. The introduction of OWF infrastructure; 68 to 107 monopiles, 4 offshore substations, inter-array cabling, cable protection and scour prevention methods, at this scale into a predominantly soft sediment benthic environment will see a hard substrate created as a consequence of the cumulative impact[8]. This will see a change in benthic community type from infauna to epifauna dominance, which will in-turn see a change in the dominant feeding type. This represents a bottom-up-pressure which will ultimately impact predator-prey relationships[9].	The project information quoted by the WTW reflects project details from the PEIR, which have been updated for the application. The changes from PEIR to Application include: • The Mona Array Area has been reduced from 450 km^2 to 300 km^2 • The maximum number of turbines has been reduced from 107 to 96 • The option for monopile foundations has been removed from the project design envelope. Foundation options include gravity base foundations and jacket foundations on pin piles or suction buckets. It should be noted that not all seabed within the Mona Array Area will be impacted, and a maximum of 2,745,616 m^2 of artificial structures will be introduced into the Mona Offshore Wind Project Order Limits. The potential for the introduction of artificial structures to result in changes to the benthic community is considered in section 2.9.6 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), where consideration is given to the impact of new communities associated with hard substrate on the existing soft sediment environment. The potential for subsequent impacts on fish and shellfish communities due to changes to benthic communities as a result of colonisation of hard structures is considered in section 3.9.7 of Volume 2, Chapter 8: Fish and shellfish ecology (APP-055). These assessments conclude that the introduction of artificial structures will have minor adverse impacts on benthic subtidal and intertidal ecology, fisheries, and shellfish ecology, which is not significant in EIA terms.

Reference	Written Submission Comment	Applicant's response
PDA-050.22	The potential influence on primary production due to the aggregation of plankton feeders in the vicinity of OWF's and hydrodynamic changes down river are ecological change drivers. Research conducted on OWF's in the North Sea show that fish density is significantly increased within the wind farm of schooling and non-schooling species, which feed on plankton feeders[10]. The reduced trawling pressure may be partially responsible for this. But, its implications may result in increased collisions with marine mammals and larger predators attracted to fish aggregations, and a bottom up food chain pressure introduced. Research has shown that marine mammals will tolerate the construction and operational phases of OWF's should the motivation to remain in the area i.e. prey abundance, be sufficient[11].	Changes in fish and shellfish communities affecting prey availability are assessed in Volume 2, Chapter 4: Marine mammals (APP-056) and Volume 2, Chapter 5: Offshore ornithology (APP-057). The assessments conclude that the effect will be of minor adverse significance, which is not significant in EIA terms, for all phases of the development, both in the assessment of the Mona Offshore Wind Project alone and cumulatively with other plans and projects.
PDA-050.23	This represents a shifting baseline, and the ecological implications of the cumulative effect that Mona and other OWF projects in this area exert needs to be thoroughly understood by undertaking an evidence-based assessment. It is far more difficult to enhance a degraded system than to take pro-active measures to develop sustainably.	The assessment for the Mona Offshore Wind Project alone and cumulatively with other plans and projects presented in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055) applies an evidence-based approach which utilises all available data. The baseline environment has been characterised through a detailed desktop study coupled with site-specific surveys, which accounts for the highly mobile nature of many marine fish and shellfish species, and is considered to be representative of the typical communities present. This ensures that the assessment is not based upon a snapshot of site-specific fisheries sampling data and that it accounts for future baseline scenarios, as outlined in section 3.5.4 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). The incorporation of time-series data from annual stock assessment surveys, for example, supports the characterisation by presenting information regarding spatiotemporal change (e.g. the Northern Ireland Herring Larvae Survey (NINEL) data, Northern Irish Ground Fish Trawl Survey (NIGFS) data and scallop stock assessment data). Changes in fish and shellfish communities affecting prey availability are assessed in Volume 2, Chapter 4: Marine mammals (APP-056) and Volume 2, Chapter 5: Offshore ornithology (APP-057).
PDA-050.24	Export Cable Corridor and Cabling WTW advocates for a risk aware, as opposed to risk averse, approach to Export Cable Corridor (ECC) route planning, with the needs of the project shouldering the greater	The Applicant notes the WTW's response. The site selection process, set out in the Volume 1, Chapter 4 Site selection and consideration of alternatives (AS-016) follows best practice approaches to the selection of all infrastructure locations.

Reference	Written Submission Comment	Applicant's response
	apportion of risk. It is accepted that a cost-benefit analysis approach to this may be the preferred strategy of the developer. However, this approach may not support the global intent of a paradigm shift in energy generation and supply that the Marine Renewable Energy (MRE) industry presents to meet climate change and energy security objectives, and take steps to enhance the marine environment.	
PDA-050.25	WTW accepts that the use of the Douglas to Point y Ayr pipeline route for the ECC presents challenges to the developer. The planned cable corridor[12] greatly exaggerates the spatial needs of the export cable, which as portrayed in the PEIR could be up to 1.5km in width running for 90km, and possibly wider at the entrance to the Array Area; the area of concern and planning dispute for the WTW is the landfall approach and as such this required increase in the approach to the Array is of a lesser concern at this time. TCE evidence-based study[13] suggest that 275kv export cable requires a separation distance of 25- 50m between cables to accommodate installation machinery. At MDS, and including a dredging restriction zone, a more realistic export corridor of ~650m, which meets the requirements of Security and Quality of Supply Standard (SQSS), should be planned for and ECC routes considered accordingly.	The key parameters for the Mona Offshore Cable Corridor are detailed in Volume 1, Chapter 3: Project Description (APP-050). The corridor width has been defined as up to 1.5 km on the basis of a separation distance of 200 m between up to four export cables (See section 4.10.3 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-016)). This separation distance is required to avoid and mitigate the risk of damage or sterilisation to neighbouring cables during installation, maintenance or repair operations. The Applicant notes that the Crown Estate (TCE) guidance (TCE, 2012) refers to the separation of 25 to 50 m in the context of alleviating risks to cables during installation and burial, and states that *"Factors influencing the spacing will need to be assessed on a case-by-case basis"*. It is the Applicant's position that should cable repairs be required during the operations and maintenance phase, that from an engineering perspective it would not be feasible to undertake repair work on a cable which had a 25 – 50 m separation distance from cables on either side without risking damage or sterilisation to the cables. The Applicant has considered the TCE Cable Route Protocol (described within TCE Cable Route Identification and Leasing Guidelines, 2021) throughout the site selection process, as presented in section 4.2.3 of Volume 1, Chapter 4: Site selection and consideration of alternative (AS-016). The width of the Mona Offshore Cable Corridor also reflects the need to maintain cable routing flexibility to allow for detailed design to take account of site conditions and/or the identification of previously unrecorded constraints such as marine archaeology or unexploded ordnance. Through detailed design, refinements to the project parameters including export cable corridor width may be possible. The width of the Mona Offshore Cable Corridor is greater where it meets the Mona Array Area to allow for flexibility in where the export cables connect to the offshore substation platforms, the final locations of which will be determined post-consent.

Reference	Written Submission Comment	Applicant's response
		Following statutory consultation on the PEIR, the Applicant has committed to installing export cables under the intertidal zone using trenchless techniques, which has been updated since WTW originally submitted this comment in its response to Section 42 consultation. The use of trenchless techniques is committed to in the Outline Landfall Construction Method Statement (APP-226) which is expected to be secured within the standalone Natural Resources Wales (NRW) marine licence, as described in the Marine Licence Principles Document (APP-195).
PDA-050.26	The Douglas to Point y Ayr pipeline route passes between Gwynt y Mor OWF East and West. The distance between the East and West sites is ≥ 1km, and < 1.5km[14]. The diameter of the gas pipe is ~0.5m. The WTW, therefore, disputes the assessment by the developer that the pipeline is taking up all available space, and strongly recommends that this route justifies further consideration.	As described in section 4.10.3 of Site Selection and Consideration of Alternatives (AS-016), after completion of engineering feasibility studies, the offshore export cable route options between the Gwynt y Mor array areas were determined by the Applicant to have too great a technical and consenting risk associated with them due to the existing presence of the Douglas gas pipeline in the gap which runs between the Douglas Field and Point of Ayr terminal. This pipeline is likely to be repurposed as part of the Hynet scheme for CO2 transportation.
PDA-050.27	WTW accepts that cable spacing forms part of the broader cable protection strategy but in this instance advocates that the developer considers ECC routes which do not encourage OWF development sprawl. Incorporating advances in cable installation and maintenance, such as remote and autonomous underwater vehicles and integrity monitoring systems, into planning can enable this. The opportunity to adopt innovative solutions in ECC route selection as opposed to routes of least resistance when embraced by the developer will demonstrate a commitment to sustainability over CAPEX considerations.	Volume 1, Chapter 4, Site selection and consideration of alternatives (AS-016) explains how the Applicant has sought to take a technically and practically feasible direct offshore route to the point of interconnection identified by National Grid. Within Volume 1, Chapter 4, Site selection and consideration of alternatives (AS-016) the Applicant has explained how the route has been refined to address feedback received in response to the PEIR, which includes commitments relating to cable protection and sandwave clearance within Constable Bank and the Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC. Details of these commitments and how they will be secured are provided in the Mitigation and monitoring schedule (APP-196).
PDA-050.28	Exploitation of areas of the seabed which have been industrialised should be prioritized. This area of the Liverpool Bay and North East Irish Sea could be considered for Strategic Resource Area (SRA) designation[15]. This may provide greater freedom of movement within the SRA to developers whilst ensuring neighbouring designated sites remain protected.	Volume 1, Chapter 4, Site selection and consideration of alternatives (AS-016) explains how the Applicant has sought to take a technically and practically feasible direct offshore route to the point of interconnection identified by National Grid. Within Volume 1, Chapter 4, Site selection and consideration of alternatives (AS-016) the Applicant has explained how the route has been refined to address feedback received in response to the PEIR.
PDA-050.29	The proposed ECC makes landfall in the vicinity of the Traeth Pensarn Site of Special Scientific Interest (SSSI). WTW understands that this concern has been raised by	Direct impacts to the *Sabellaria alveolata* reef at the Mona landfall have been avoided through the commitment to using trenchless techniques. This commitment was made following statutory consultation on the PEIR, resulting in the reef now

Reference	Written Submission Comment	Applicant's response
	Natural Resources Wales (NRW) and the developer has amended the MDS accordingly. However, WTW is still concerned that the proposed route to the West of the SSSI will impact sensitive reef and soft sediment features recorded in this area, including honeycomb worm reef; Sabellaria alveolate[16], and vegetated shingle[17]. These features are susceptible to sediment resuspension, trenching, and drilling activity. The Sabellaria alveolate reef at Llanddulas acting as the larvae source site for recruitment at other sub-populations in the North East Irish Sea, and the vegetated shingle site identified as one of 13 judged to be of significant importance in Wales.	being located outside the intertidal Mona Offshore Wind Project Order Limits (see updated Order Limits from PEIR to DCO in Figure 1.4 of Annex 7.3 to the Applicant's response at the Procedural Deadline (PDA-025)). The *Sabellaria alveolata* reef is over 250 m from the Mona Offshore Wind Project Order Limits in the intertidal, and at least 28 m from the subtidal Order Limits. The commitment to using trenchless techniques is set out in the Outline Landfall Construction Method Statement (APP-226) which is expected to be secured within the standalone NRW marine licence as described in the Marine Licence Principles Document (APP-195). Regarding potential indirect effects such as an increase in suspended sediment concentration, these have been assessed within Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) and Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). Additionally, during construction, the Applicant has committed to a 50 m exclusion buffer from the edge of the *Sabellaria alveolata* reef, in accordance with industry standard practice. The buffer will be based on the extent of the reef as mapped during the 2023 Mona Phase I intertidal survey (Figure 1.60 of Volume 6, Annex 2.1: Benthic subtidal and intertidal ecology technical report (APP-087)) and is committed to within the Outline Landfall Construction Method Statement (APP-226) which is expected to be secured within the standalone NRW marine licence as described in the Marine Licence Principles Document (APP-195). Dispersion modelling of suspended sediment arising from intertidal cable installation predicted that sediment may be deposited on the shoreline with a maximum depth of around 18 mm at the location of sediment release and reducing to up to 10 mm in close proximity (circa 100 m – 200 m) and typically far less along the shoreline (1 mm to 2 mm) which is redistributed further on successive tides following cable installation. The Applicant is therefore confident that a 50 m exclusion buffer based on the extent mapped in the 2023 surveys is sufficiently precautionary to minimise any potential indirect effects. Regarding the coastal vegetated shingle site protected as part of the SSSI within the Traeth Pensarn SSSI, this feature is located above the mean high water spring line and is outside the Mona Offshore Wind Project Order Limits, resulting in no potential impact pathways in regard to the intertidal works being undertaken for the Mona Offshore Wind Project.
PDA-050.30	The ECC will pass though the Liverpool Bay SPA; specific concerns arising from which the WTW will defer to responses made by the Royal Society for the Protection of	The Applicant notes the WTW's response. Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) includes a full assessment of the potential impact on the benthic habitats in Constable Bank and the Y Fenai a Bae Conwy/Menai

Reference	Written Submission Comment	Applicant's response
	Birds (RSPB), and the Menai Strait and Conway Bay SAC, as well as the aforementioned SSSI. These designated sites reflect the biodiversity importance of the area's intertidal sands, reefs and sandbanks. The proposed ECC encroaches on the sandbank feature known as Constable Bank which the developer acknowledges. The soft sediments of this area are breeding and spawning sites for several commercial fish species, including Atlantic Herring *Clupea harengus*, and other identified species of principle importance. The decline of fish recruitment and collapse of stocks in the Irish Sea is contributed to by the increasing pressure which is being applied to nursery grounds of which Constable Bank is an example. Further industrialisation of this area may breach a threshold beyond which the disturbance cannot be accommodated by the environment.	Strait and Conway Bay SAC. The Applicant notes that none of designated features of the SAC are present within the small area of overlap with the Mona Offshore Cable Corridor (as determined by the site-specific surveys) and so will not be directly impacted, which was agreed by NRW in the Benthic ecology, Fish and shellfish ecology and Physical Processes EWG (Table 1.6 of the Technical Engagement Plan (APP-041)). Volume 2, Chapter 5: Offshore ornithology (APP-057) includes a full assessment of the potential impact on the designated features of the Bae Lerpwl/Liverpool Bay SPA which has considered consultation feedback provided by the RSPB throughout the evidence plan process as set out in the Technical Engagement Plan (APP-041). The potential effects on fish species and their habitats have been assessed in full in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). Soft sediments are not typically used by herring for spawning. Relevant fish spawning and nursery grounds are characterised and assessed within Volume 6, Annex 3.1: Fish and shellfish ecology technical report (APP-089) and Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). The Applicant has committed to a comprehensive range of mitigation measures to reduce impacts to protected areas and IEFs. Details of these including how they will be secured is provided in the Mitigation and monitoring schedule (APP-196).

Reference	Written Submission Comment	Applicant's response
PDA-050.31	The developer acknowledges that the project may potentially lead to physical impacts including changes to the tidal, wave, and sediment transport and associated sediment transport pathways. However, the developer proposes that the impacts on receptors, including designated sites, to not be significant. However, it has been observed that suspended particulate matter in the wake of OWF infrastructure to be higher than in surrounding waters suggesting increased turbulent mixing and upwelling as a consequence[18]. The impact of which may cause changes in the distribution of heat and salinity, and resuspension of heavily polluted sediments. The WTW acknowledges that the Liverpool Bay area and the North East Irish Sea is subject to significant tidal range, wave environments and the periodic increases in suspended sediment concentration that the benthic ecology is adapted to. However, the increasing anthropogenic disturbance to this benthic ecology is not yet fully understood and the impact should be avoided or mitigated at all costs.	The Applicant notes the WTW's response. This point was raised by WTW in their S42 response and is considered in Table 1.6 of Volume 2, Chapter 1: Physical processes (APP-053). Changes in tidal currents and sediment transport as a result of the presence of infrastructure have been quantified in the modelled outputs presented in Volume 6, Annex 1.1: Physical processes technical report (APP-086), and incorporated into the assessment in Volume 2, Chapter 1: Physical processes (APP-053). The impacts of increased suspended sediment concentrations on ecological receptors are addressed in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) and Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). Sediment chemistry data is presented in Volume 6, Chapter 2.1: Benthic subtidal and intertidal ecology technical report (APP-087) and cross-referenced in assessments relating to sediment and water quality as appropriate, including Volume 6, Annex 2.2: Water Framework Directive Coastal Waters Assessment (APP-088), Volume 2, Chapter 1: Physical processes (APP-053) and Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054). In their Relevant Representation (RR-011), NRW noted that no sediment contaminants exceeded the CEFAS action level 2 threshold and that very few contaminants exceeded the CEFAS action level 1 threshold. Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) considers the potential impact of disturbance/remobilisation of sediment-bound contaminants on subtidal IEFs and Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC during the construction and decommissioning phases will be negligible.
PDA-050.32	WTW advocates that the developer commits to developing a Cable Specification and Installation Plan (CSIP) which will contain a Cable Burial Risk Assessment (CBRE).	Development and adherence to an offshore construction method statement which includes a cable specification and installation plan (CSIP) that incorporates a Cable Burial Risk Assessment (CBRA) is secured within the deemed marine licence in schedule 14 of the Draft DCO (PDA-003) and is expected to be secured within the standalone NRW marine licence as described in the Marine Licence Principles Document (APP-195).
PDA-050.33	As the UK moves from a centralised to a decentralised energy supply, and the demand increases the need to strategically plan cable network design is paramount. The needs of the Mona OWF are less significant than the delivery of a future proofed network. It is important that we deliver on climate change mitigation measures but not in a manner which only serves short sighted ambitions.	The Applicant notes the WTW's response. Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project. Ultimately, the National Grid Electricity System operator (NGESO) concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales and therefore this is the

Reference	Written Submission Comment	Applicant's response
		only option the project considered as part of the site selection process. Details for the identification of the point of interconnection are contained with Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-016).
PDA-050.34	As previously stated, it is more difficult to enhance a degraded environment than it is to adopt, from the outset, an agile project management approach that minimizes the invasive nature of the project at all costs. This practice would be a clear demonstration by Mona OWF to be embracing the paradigm shift offered by MRE generation; placing the needs of the environment before the needs of the project.	Volume 1, Chapter 4, Site selection and consideration of alternatives (AS-016) explains how the Applicant has sought to take a technically and practically feasible direct offshore route to the point of interconnection identified by National Grid. Within this document, the Applicant has explained how the route has been refined to address feedback received in response to the PEIR. The Applicant has committed to a range of measures to minimise potential environmental impacts during the detailed design stage post-consent. This includes, for example, an exclusion buffer to avoid sensitive IEFs and commitments to trenchless techniques at landfall, and commitments to limiting cable protection and sandwave clearance in protected areas. Details of all measures and how they are secured is provided in the Mitigation and monitoring schedule (APP-196).
PDA-050.35	The assessed impact of the inter array cables has been previously discussed in the Mona Array Area section of this response. An evidence-based assessment of benthic change impact which includes the developer response to resurfacing, and BNG measures to be undertaken, is advocated by the WTW	Refer to the response to WTW's comment on the Mona Array Area above (PDA-050.12). The Mona Offshore Wind Project has committed to delivering a net benefit for biodiversity in accordance with Welsh Government's Approach to Net Benefits for Biodiversity and the DECCA Framework in Terrestrial Planning System (CIEEM, 2022), which is the equivalent of BNG for Welsh Projects. Whilst there is currently no legislative requirement to deliver NBB in the offshore environment, the Applicant is exploring opportunities for intertidal and offshore NBB as presented in section 3.5 of the Biodiversity Benefit and Green Infrastructure Statement (APP-193). The Applicant will continue to explore these opportunities as the project design develops in collaboration with stakeholders post-consent.
PDA-050.36	Underwater noise It is understood by WTW, following a meeting with the development team in May 2023, that the Mona OWF piling strategy will take a concurrent approach. WTW will be advocating that sequential piling strategy is adopted with a further commitment to adopt soft start protocols.	The Applicant notes the response from WTW on sequential piling. Modelling has been undertaken for both concurrent and consecutive piling based on the MDS for both spatial and temporal pile installation in Volume 5, Annex 3.1: Underwater sound technical report (APP-079). Concurrent piling assumes two vessels piling at exactly the same time at a minimum distance of 1.4 km and a maximum distance of 15 km, and concurrent piling will only occur at a maximum hammer energy of 3,000 kJ (i.e. no concurrent piling where a 4,400 kJ hammer is required) between wind turbine jacket foundations. The Applicant's commitment to these minimum and maximum separation distances and maximum hammer energy of 3,000 kJ for concurrent

Reference	Written Submission Comment	Applicant's response
		piling is secured through the development and adherence to a Marine Mammal Mitigation Protocol (MMMP) which is secured within the deemed marine licence in Schedule 14 of the draft development consent order (DCO) (PDA-003) and expected to be secured within the standalone Natural Resources Wales (NRW) marine licence, as described in the Marine Licence Principles Document (APP-195). Consecutive piling of a wind turbine foundation and an OSP foundation was also modelled, assuming one foundation per 24-hour period. The consecutive piling conservatively assumes sequential piling of pin piles one after another over 24 hours with no breaks in between and assumes the marine mammal will not return to the area within the 24-hour period. This is considered to be very precautionary. The marine mammal assessment in Volume 2, Chapter 4: Marine mammals (APP-056) was then based upon whichever scenario was the worst case for each species (in this case, concurrent piling). The Applicant highlights its commitment to the development of and adherence to a MMMP, which will be developed in accordance with the Outline MMMP (APP-207), secured within Schedule 14 (Part 2. Condition 21) of the draft DCO (PDA-003) and includes a commitment to implementation of a piling soft start and ramp-up. The Outline MMMP also presents other appropriate mitigation for activities that could potentially lead to injurious effects on marine mammals including piling. The Outline MMMP (APP-207) sets out the measures to apply in advance of and during piling activity, including the use of Marine Mammal Observers (MMOs), Passive Acoustic Monitoring (PAM) and Acoustic Deterrent Devices (ADD). The assessment of injury and disturbance from elevated underwater sound during piling in Volume 2, Chapter 4: Marine mammals (APP-056) concluded that there will be no significant effects arising from the Mona Offshore Wind Project alone during the construction, operations and maintenance or decommissioning phases. Furthermore, the Applicant has committed to an Underwater Management Strategy (UWSMS) (APP-202) secured within Schedule 14 (Part 2. Condition 20) of the draft DCO (PDA-003), which provides a framework to reduce the magnitude of impacts from elevated underwater sound (including piling) from the Mona Offshore Wind Project if required post-consent, and consequently contributes to reducing the Project's contribution to potential cumulative impacts. The final UWSMS will set out the measures agreed with NRW and SNCBs to reduce sound levels associated with residual significant impacts from the project to a non-significant level and to minimise the Mona Offshore Wind Project's contribution to any cumulative effect. This demonstrates the Applicant's commitment to reducing any impact from elevated underwater sound from piling on marine mammals.

Reference	Written Submission Comment	Applicant's response
PDA-050.37	Marine impact piling is a significant low-frequency high amplitude impulsive sound that can travel considerable distance in the water column. The attenuation of which is governed by the inverse square law with respect to energy intensity and distance from source. The impact on valued ecological receptors (VERs) is an ongoing area of research.	Modelling has been undertaken in Volume 5, Annex 3.1: Underwater sound technical report (APP-079) across a range of frequencies using attenuation more complex than the inverse square law, which seeks to include the interaction of the sound waves with the sea floor, and how low frequencies attenuate compared with higher frequencies. This peer-reviewed method is in accordance with best practice and has been used for a number of offshore wind farms in UK waters. The Applicant highlights that the approach to underwater sound modelling was presented to the marine mammal EWG in an underwater sound technical note and discussed further in Marine Mammals EWG 3 (see E4 Technical Engagement Plan (APP-041) and E4.1 Technical Engagement Plan Appendices - Part 1 (A to E) (APP-042)), with the approach agreed with NRW. Responses on specific points raised by WTW in relation to impact piling are provided below.
PDA-050.38	Temporary and Permanent Threshold Shifts (TTS and PTS respectively) need to be considered relative to specific species present in the zone of influence of the project which is home to several identified species of principle importance. Soft start, and a sequential strategy present mitigation measures which limit the dose of underwater noise to receptors. Determination of minimum distance between sound exposure and pressure level should be made relative to the most acoustically sensitive species identified within the zone of influence of the project.	Both Temporary and Permanent Threshold Shifts (PTS and TTS) are considered in the assessments presented in Volume 2, Chapter 4: Marine mammals (APP-056) and Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). The piling mitigation zone for marine mammals will be defined in the final MMMP and will be based on the most sensitive species, i.e. the greatest range of effect, from either cumulative sound exposure level (SEL_{cum}) or sound pressure level (SPL_{peak}) as detailed in the Outline MMMP (APP-207).
PDA-050.39	Mitigation measures are in place in the draft Marine Mammal Mitigation Protocol (MMMP) and will be subject to statutory oversight. The MMMP is secured by conditions of the Marine License Principles and will be agreed with NRW prior to the commencement of construction.	The Applicant notes the WTW's response. The Outline MMMP (APP-207) is secured within the deemed marine licence in Schedule 14 of the draft DCO (PDA-003) and is expected to be secured within the standalone NRW marine licence, as described in the Marine Licence Principles Document (APP-195).
PDA-050.40	The WTW notes that the Mona OWF intends to use active deterrent measures to mitigate the collision risk introduced by the OWF infrastructure and increased shipping. Before implementation of these measures baseline assessment of underwater noise must be undertaken to appreciate the impact of the acoustic deterrence on the ambient noise.	The use of Acoustic Deterrent Devices (ADDs) has been recommended as part of the Outline MMMP (APP-207) to deter animals from potential injury zones that may occur during piling. This measure has not been suggested to reduce collision risk. The risk of collision will, however, be reduced through the implementation of an Offshore environmental management plan. This will include details of Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels (APP-203) as set out within Schedule 14 Condition 18(1)(e)(vi) of the draft development consent order (PDA-003). The Measures to minimise disturbance to

Reference	Written Submission Comment	Applicant's response
		marine mammals and rafting birds from transiting vessels (APP-203) confirms that key principles from the Wildlife Safe (WiSe) Scheme will be followed, unless otherwise agreed with the statutory nature conservation bodies. These comprise appropriate craft-handling around wild animals (such as avoiding sudden changes in speed and avoiding over revving of engines); codes of conduct; information on local and national laws relating to wildlife; and information on each of the species that are commonly encountered. The site induction process will be used to ensure that key personnel are aware of the need to follow these principles. The WiSe Scheme is referenced and endorsed in other relevant codes of conduct for water users, including those produced by both Defra (Defra, 2023) and NatureScot (NatureScot, 2023). Incorporating key principles from the WiSe Scheme will reduce the disturbance of vessel transits on marine mammals and rafting birds visible at the water surface.
PDA-050.41	WTW advocates the precautionary approach with respect to underwater noise. The developer must mitigate for the encroachment and activity which will take place in the Menai Strait and Conway Bay SAC in line with noise thresholds and disturbance impacts on the designated species. This precautionary approach should be factored into all aspects of the project prior to the introduction of noise levels in UK waters; comparative to the noise mitigation regulations in the German Exclusive Economic Zone[19],[20], being standardised as part of the measures included in BESS. The WTW advocates for a noise limit which is applied in all UK waters and to all receptors removing any ambiguity with respect to individual project noise and cumulative effects.	A precautionary approach has been developed using maximum design parameters and precautionary sound thresholds for injury and disturbance to marine mammals and fish receptors which are presented in Volume 5, Annex 3.1: Underwater sound technical report (APP-079). It is therefore considered that the ranges presented in Volume 5, Annex 3.1: Underwater sound technical report (APP-079) are highly precautionary. At each stage the assessment includes levels of precaution and conservative assumptions to ensure a precautionary approach. For example, the assessment of marine mammals adopts conservative species densities and slow swim speeds which are considered to result in the maximum numbers potentially affected by injury/disturbance. Similarly, for fish, it was assumed that individuals would be exposed within impact ranges for a period of 48 hours continuously in the case of recoverable injury and 12 hours continuously in the case of TTS whilst in reality it is likely that individuals would move away from the sound source to reduce exposure. Details of the precautionary assumptions are provided in Volume 2, Chapter 4: Marine mammals (APP-056) and Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). As described above in the response to PDA050.36, yhe Applicant has committed to developing a MMMP to control the risk of auditory injury effects of underwater sound on marine mammals. In addition, the Applicant has committed to developing an Underwater Sound Management Strategy (UWSMS) to address any residual impacts from underwater sound so that they are reduced to not significant. The MMMP and UWSMS will be developed post-consent in accordance with the Outline UWSMS (APP-202) and Outline MMMP (APP-207) and in consultation with the licensing authority and SNCBs. The final MMMP and UWSMS will take

Reference	Written Submission Comment	Applicant's response
		account of refined project design information and will be developed in line with any updated guidance.
PDA-050.42	WTW hope's these comments are helpful and would welcome further engagement and discussion with Mona Offshore Wind Farm as the consenting processes.	The Applicant welcomes further engagement with WTW throughout the Examination phase of the Mona Offshore Wind Project.

1.13 Lois Williams

Table 1.13: PDA-051 – Lois Williams

Reference	Written Submission Comment	Applicant's response
PDA-051.1	I am the owner of [redacted], in Cefn Meiriadog, whose business is affected by the Mona Offshore Wind Farm project. Both intrusive and non-intrusive works have been carried out on my land in connection with the Mona project, and I have had on-site meetings with Dalcour Maclaren as Mona's agents. The Title Number of the land in question is CYM456237.	Dalcour Maclaren on behalf of the Applicant has been in contact with Ms Williams since March 2022 to arrange non-intrusive access for ecology walkover surveys. Dalcour Maclaren met with Ms Williams and her agent on 6 September 2023 to discuss proposed intrusive surveys comprising of one plate test, one trial pit and two Dynamic Cone Penetration tests. The intrusive license was issued the following day on 7th September to her agent via email. Subsequently, prior to the licence being signed the land within Title Number CYM456237 was removed from the Applicant's order limits and therefore, no intrusive surveys have been undertaken on this land.
PDA-051.2	In addition to the work affecting my farmland, I also own a property close to the site where Mona propose to build their substation. The property, [redacted], is a Grade 2 listed building adjacent to the property Tyddyn Meredydd, whose owners ([redacted]) I note are already registered for the Examination [redacted] and Tyddyn Meredydd are the two properties closest to the proposed substation site and together with nearby Cae Llwyd, are those most affected by it in terms of being visual receptors.	The Applicant is aware of the Grade 2 listed building known as "Pentre Meredydd", due diligence undertaken by the Applicant suggests that this property is unhabitated and therefore has not been identified as a residential receptor in the assessments undertaken but it has been identified as a cultural heritage receptor within the Historic environment Chapter [APP-068]. The Applicant has undertaken due diligence to identify and confirm the owner of Pentre Meredydd and are in dialog with the owners' land agent. The owners of Cae Llwyd are listed in part 2 of the D4. Book of Reference (F03) and the Applicant is in dialog with the owners' land agents.
PDA-051.3	My dealings with Mona and Dalcour Maclaren are handled by my land agent, Jones Peckover, at their Abergele office. Aware of today's deadline for registration, I have today asked Jones Peckover to provide me with my reference number in connection with the Mona consultation, but unfortunately the person handling my business was out of the office and the member of staff he asked to get in touch about it did not get back to me. Notwithstanding the above, I would like to register to attend the meetings to be held at Venue Cymru from the 16th-19th July. I wish to attend as an observer and would not plan to speak. I would also like to be regarded an an Interested Party given the way my properties are affected.	Dalcour Maclaren are in ongoing dialog with Jones Peckover regarding their client's interest.

1.14 Martyn and Margaret Hussey

Table 1.14: PDA-052 - Martyn and Margaret Hussey

Reference	Written Submission Comment	Applicant's response
PDA-052.1	We wish to nominate that our property be included within locations for Site Inspections Reasons · Unique position within the proposed onshore development with construction works behind, to the side and in front, including the onshore substation. · Incorrect assumptions made by the applicant in their reports Issues to be observed · Close proximity to onshore developments · Visual and noise impacts · Cumulative impacts	The Applicant notes your response and has included the property within the draft itinerary for the Accompanied Site Inspection proposed for October. The applicant will be in touch closer to the time to arrange suitable access requirements.
PDA-052.2	I am unable to attend hearing ISH1 on Tuesday 16th July to discuss the scope of the development, however I wish to make the following comment relating to:- Applicants response to the Examining Authority's Rule 4,6,9 and 13 at Procedural Deadline Document S_PD_2 ref MOCNS-J3303-JVW-10217 dated 25th June 24	The Applicant notes your response.
PDA-052.3	I wish to challenge the applicant's request (Table 2 item 7) to bring forward Deadline 1 to allow more time for their review and responses.	The Applicant notes your response.
PDA-052.4	Throughout this process it has, and will be, extremely difficult for affected individuals like myself to review the multitude of documents issued throughout the process and provide response where appropriate whilst adhering to the timelines. Deadline 1 which as the applicant states is only 17 days (13 working days), means that any change bringing it forward will exacerbate issues for individuals like myself. Whilst I might understand the applicant's request, they do employ large numbers of full time professionals in this	The Applicant notes your response.

Reference	Written Submission Comment	Applicant's response
	process so I politely ask that any request to shorten Deadline 1 is declined.	

1.15 Robert Parry

Table 1.15: PDA-053 – Robert Parry

Reference	Written Submission Comment	Applicant's response
PDA-053.1	Dear Sirs In addition to producing evidence on the issues raised in the relevant representation dated 3rd May 2024 (attached for ease of reference) we would like to request that the inspector carries out a site inspection of plots 06-101 to 06-106 at the appropriate time and before their recommendation report is completed. We also would appreciate the opportunity to address the specific compulsory purchase hearing at the appropriate juncture.	The Applicant notes your response and has included the plots mentioned in the representation in the draft itinerary for the Accompanied Site Inspection in October. The Applicant's land agents will be in contact to arrange access to the land.

1.16 Sir Watkin Williams-Wynn

Table 1.16: PDA-054 - Sir Watkin Williams-Wynn

Reference	Written Submission Comment	Applicant's response
PDA-054.1	Dear Sirs, We represent the above-mentioned party. We note that the initial meetings concern the manner in which the application is examined. We wish to place on record that due to the proposed land take (and nature of the interests being acquired), our client will require at least one Compulsory Acquisition Hearing.	The Applicant notes the response from Sir Watkin Williams-Wynn and in accordance with the Rule 8 letter (PD-010) the week commencing 14 October and 21 October are reserved for matters including Compulsory Acquisition Hearings.
PDA-054.2	The Applicant has not made much progress with my client regarding the acquisition of those interests (for a variety of reasons) and we feel that this will be a significant area of debate and discussion.	The Applicant will continue to seek engagement to progress agreements voluntarily.
PDA-054.3	We are happy to attend any of the initial hearings if the ExA wish to hear our thoughts on process for examining these issues.	The Applicant notes the response.

1.17 Meath County Council

Table 1.17: OD-021 - Meath County Council

Reference	Written Submission Comment	Applicant's response
OD-021.1	I refer to the consultation process which is being carried out in accordance with the provisions of the 1991 United Nations Economic Commission for Europe Convention on Environmental Impact Assessment in a Transboundary Context ("the Espoo Convention"), for the proposed Mona Offshore Wind Project, an offshore wind array located in the east Irish Sea, 28.2km from the Anglesey coastline, offshore transmission infrastructure extending to landfall on the north coast of Wales; and an onshore transmission infrastructure extending from landfall to the onshore National Grid substation at Bodelwyddan. As per the Environmental Assessment Non-Technical Summary, the applicable area is 300km² within Welsh offshore waters (beyond 12 nm from the Welsh coast). Meath County Council is a Coastal Planning Authority along the east coast of Ireland and the following comments are provided for the consideration of the Planning Inspectorate. The UK Government has a target of 50 GW to be generated from offshore renewable energy (wind) by 2030 and the Irish Government has a target of 5GW from offshore renewable energy over the same timescale (as per the Irish National Climate Action Plan).	The Applicant welcomes Meath County Council's comments. 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). Therefore, the Mona Offshore Wind Project has a critical role to play – both in helping the UK 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) The Applicant has provided responses to each of the points raised by Meath County Council below.
OD-021.2	Several offshore renewable projects are planned in the west Irish Sea, including two no. two offshore wind farm development consent projects which were recently submitted to An Bord Pleanála (ABP) for decision. ABP are the decision maker on projects deemed to be 'strategic infrastructure' and are also the 'Competent Authority' for the purposes of Environmental Impact Assessment. The Planning Inspectorate are respectively requested to consider the following applications in the EIA/ Environmental	Both the Oriel and NIAS offshore wind projects have been considered as part of the Mona Offshore Wind Project application. They were categorised as tier 2 cumulative projects on the basis that no application had been published at the time of the assessment (see Volume 1, Chapter 5: Environmental Impact Assessment Methodology (APP-052) for a description of cumulative project tiers). In accordance with section 3.4.9 of the Planning Inspectorate's advice note seventeen (Planning Inspectorate, 2019), the list of cumulative projects was finalised three months before submission of the Environmental Statement (on 21 November 2023).

<table>
<tr><th>Reference</th><th>Written Submission Comment</th><th>Applicant's response</th></tr>
<tr><td></td><td>Assessment associated with the Mona Offshore Wind Project:

<table><tr><td>Applicant: North Irish Sea Array (NISA) Wind Farm Ltd.</td><td>Applicant: Oriel Wind Farm Ltd.</td></tr><tr><td>Location: Off Co. Louth, Co. Meath, Co. Dublin and landfall in Co. Dublin

Description: 35-49 no. Wind Turbines & Assoc. Works; Total blade tip height of 290-316m above LAT (max); Megawatt export capacity of 375 MW; 43-year operational life.</td><td>Location: Off Co. Louth and landfall in Co. Louth

Description: 25 no. Wind Turbines & Assoc. Works; Total blade tip height of 270m above LAT (max); Megawatt export capacity of 700 MW; 35-year operational life.</td></tr><tr><td>File Reference No.: ABP-319866-24</td><td>File Reference No.: ABP-319799-24</td></tr><tr><td>Website Information:
https://www.pleanala.ie/en-ie/case/319866
www.northirishseaarraysid.ie</td><td>Website Information:
https://www.pleanala.ie/en-ie/case/319799
https://www.orielwindfarm-marineplanning.ie/</td></tr></table></td><td>How each topic has considered the Oriel and NISA offshore wind projects is presented in Volume 5, Annex 5.1: Cumulative effects screening matrix (APP-084).

Oriel is 130 km from the Mona Array Area and was screened out from the cumulative assessment for all topics apart from marine mammals and offshore ornithology on the basis of no conceptual or physical effect-receptor pathway. Marine mammals and offshore ornithology include Oriel in the cumulative assessments (Volume 2, Chapter 4: Marine mammals (APP-056) and Volume 2, Chapter 5: Offshore ornithology (APP-057)).

NISA is 114 km from the Mona Array Area and was screened out from the cumulative assessment for all topics apart from marine mammals and offshore ornithology on the basis of no conceptual or physical effect-receptor pathway. Marine mammals and offshore ornithology include NISA in the cumulative assessments (Volume 2, Chapter 4: Marine mammals (APP-056) and Volume 2, Chapter 5: Offshore ornithology (APP-057)).

The assessments have considered all reasonably foreseeable interactions based on project information available at the time of the assessment. The Applicant is currently undertaking a review of the material now available.</td></tr>
<tr><td>OD-021.3</td><td>The Environmental Impact Assessment Reports (EIAR) prepared by the project proponents identified likely significant effects including inter alia:

• Oriel – negative visual impacts on the local/ Irish coastline, negative impacts on bats in the marine environment and beneficial displacement of Greenhouse Gases (GHGs).

• NISA – negative visual impact on the local/ Irish coastline, potential detonation of unexploded ordnance</td><td>The Applicant notes the likely significant effects from the Oriel and NISA offshore wind projects as identified in their Environmental Impact Assessment Reports (EIAR).

All impacts and receptors scoped into the EIA for the Mona Offshore Wind Project have been assessed in the Environmental Statement (APP-086 to APP-184).</td></tr>
</table>

Reference	Written Submission Comment	Applicant's response
	(UXO) and impact on minke whales, negative impact on commercial fisheries, water quality and bats in the marine environment and birds; and the beneficial displacement of CO2.	
OD-021.4	Mitigation of the likely significant effects include *inter alia*: • Oriel – proposed pile-driving strategy to reduce the impact on marine mammals, turbine curtailment during peak bat migration periods and static bat detectors. • NISA – proposed pile-driving management protocol to reduce the impact on marine mammals, increase in turbine air draft between the bottom of turbine blade and the water to reduce collision risk to key vulnerable bird species, fisheries management and mitigation strategy, turbine curtailment during peak bat migration periods and static bat detectors; design flexibility for offshore infrastructure to avoid unexploded ordnance.	The Applicant notes the proposed mitigation to address likely significant effects from the Oriel and NISA offshore wind projects. Mitigation and monitoring commitments for the Mona Offshore Wind Project are set out in the Mitigation and monitoring schedule (APP-196).
OD-021.5	Other projects in the west Irish Sea include the Arklow Banks Wind Park Ltd. project Phase 2 which is located off Co. Wicklow with a proposed landfall north of Arklow Town for up to 56 Wind Turbines and Associated Works1. There are other projects at the pre-planning stage (e.g. Dublin Array and Codling Wind Park) that may have been lodged into the planning system before a decision is made on the Mona Windfarm project.	Other offshore wind projects in the west Irish Sea (including Arklow Bank Phase 2, Dublin Array and Codling Wind Park) have been considered as part of the Mona Offshore Wind Project application. They were categorised as tier 2 cumulative projects on the basis that no application had been published at the time of the assessment (see Volume 1, Chapter 5: Environmental Impact Assessment Methodology (APP-052) for a description of cumulative project tiers). In accordance with section 3.4.9 of the Planning Inspectorate's advice note seventeen (Planning Inspectorate, 2019), the list of cumulative projects was finalised three months before submission of the Environmental Statement (on 21 November 2023). How each topic has considered Arklow Bank Phase 2, Dublin Array and Codling Wind Park offshore wind projects is presented in Volume 5, Annex 5.1: Cumulative effects screening matrix (APP-084). Arklow Phase 2 is 146 km from the Mona Array Area and was screened out from the cumulative assessment for all topics apart from marine mammals and offshore ornithology on the basis of no conceptual or physical effect-receptor pathway. Marine mammals and offshore ornithology include Arklow Phase 2 in the

Reference	Written Submission Comment	Applicant's response
		cumulative assessments (Volume 2, Chapter 4: Marine mammals (APP-056) and Volume 2, Chapter 5: Offshore ornithology (APP-057)). Dublin Array is 126 km from the Mona Array Area and was screened out from the cumulative assessment for all topics apart from marine mammals, offshore ornithology, commercial fisheries and shipping and navigation on the basis of no conceptual or physical effect-receptor pathway. This project was subsequently screened out of the shipping and navigation assessment on the basis of limited data available on which to undertake an assessment. Marine mammals and offshore ornithology include Arklow Phase 2 in the cumulative assessments (Volume 2, Chapter 4: Marine mammals (APP-056) and Volume 2, Chapter 5: Offshore ornithology (APP-057)). Codling Wind Park is 125 km from the Mona Array Area and was screened out from the cumulative assessment for all topics apart from marine mammals, offshore ornithology and shipping and navigation on the basis of no conceptual or physical effect-receptor pathway. This project was subsequently screened out of the shipping and navigation assessment on the basis of limited data available on which to undertake an assessment. Marine mammals and offshore ornithology include Arklow Phase 2 in the cumulative assessments (Volume 2, Chapter 4: Marine mammals (APP-056) and Volume 2, Chapter 5: Offshore ornithology (APP-057)). The assessments have considered all reasonably foreseeable interactions based on project information available at the time of the assessment. The Applicant is currently undertaking a review of the material now available.
OD-021.6	In the assessment of the proposed Mona Offshore Windfarm project, it is respectively requested that the Planning Inspectorate considers the cumulative effects of offshore renewable energy projects in UK and Irish waters/ Irish Sea. In particular, the proposed timing of construction activities for individual projects, across the Irish Sea given the potential significant impact on the marine and coastal environments including biodiversity and water quality as a result of sedimentation generated during the construction phase and re-suspension of material in the water column.	The timings of the construction activities for proposed projects in the Irish Sea have been considered by each topic when screening projects into each cumulative effects assessment. Volume 5, Annex 5.1: Cumulative effects screening matrix (APP-084) presents the temporal overlap of each cumulative project with the Mona Offshore Wind Project. The assessments have considered all reasonably foreseeable interactions based on available project information at the time of the assessment. The majority of EIA assessment topics screened out west Irish Sea Projects on the basis of no conceptual or physical effect-receptor pathway. A screening distance of two tidal excursions has been used for potential cumulative increases in suspended sediments with other projects which represents where study areas for adjacent projects and developments, defined in a similar way, may intersect. The west Irish Sea projects lie outside two tidal excursions. Further detail is presented in Volume 2, Chapter 1: Physical Processes (APP-053).

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OD-021.7	The Planning Inspectorate are invited to consider the visual impacts of the proposed Mona Offshore Wind Farm project and its interrelationship/ intervisibility between the other various projects in the western Irish Sea. It is noted that the EIAR which forms part of the Oriel application states that the project is theoretically visible from the Isle of Man and portions of Anglesey. This may also be relevant to the NISA project and other renewable energy projects enter the planning system. The Planning Inspectorate are also requested to consider the effects of the proposed development on navigation and commercial fisheries in the Irish Sea.	The Mona Offshore Wind Project has considered visual impacts from cumulative projects in the west Irish Sea. As presented in Volume 2, Chapter 8: Seascape and visual resources (APP-060), the Mona Offshore Wind Project used a seascape and visual resources study area of 50 km, which was based on an analysis of the Zone of Theoretical Visibility. This study area was based on best practice guidance (White Consultants, 2020) and was agreed with NRW in the EIA scoping report for the Mona Offshore Wind Project (Mona Offshore Wind Ltd, 2022). West Irish Sea offshore wind projects were screened out from the seascape and visual resources cumulative assessment on the basis of no conceptual or physical effect-receptor pathway. With the exception of Lir Offshore Array, all west Irish Sea offshore energy projects are over 100 km away from the Mona Array Area. Lir Offshore Array was screened out on the basis of limited data available on which to undertake an assessment (Volume 5, Annex 5.1: Cumulative effects screening matrix (APP-084)). The Mona Offshore Wind Project has considered shipping and navigation impacts from cumulative projects in the west Irish Sea. As presented in Volume 2, Chapter 7: Shipping and navigation (APP-058), the Mona Offshore Wind Project used a shipping and navigation study area of 10 nautical miles (nm) for the Mona Array Area and 3 nm of the Mona Offshore Cable Corridor. In addition, the waters of the east Irish Sea to the south and east of the Isle of Man have been considered in terms of shipping routes and their interaction with the Mona Offshore Wind Project and existing and planned offshore wind projects within this area for cumulative effects assessment. The shipping and navigation study area was discussed and agreed with key stakeholders during pre-application consultation (See section 7.44 of Volume 2, Chapter 7: Shipping and navigation (APP-059)). West Irish Sea offshore wind projects were screened out from the shipping and navigation cumulative assessment on the basis of no conceptual or physical effect-receptor pathway or on the basis of limited data available on which to undertake an assessment (Volume 5, Annex 5.1: Cumulative effects screening matrix (APP-084)).
OD-021.8	Project developers in the western Irish Sea have consulted with each other during the pre- planning stage and similar types of mitigation measures are emerging within the project application documentation. Should the Planning Inspectorate consider it appropriate that the proposed Mona project proceed, it is recommended that a broadly consistent approach is adopted or international best practice informs the application of EIA/ Environmental Assessment mitigation	The Applicant has undertaken extensive consultation throughout the pre-application phase with stakeholders and other developers (Consultation Report (APP-037). The Applicant has engaged with shipping and navigation stakeholders and other developers 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

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	measures to avoid any potential residual transboundary effects, etc.	stakeholders and met six times between 2021 and 2024. The Applicant has committed within Volume 2, Chapter 7: Shipping and navigation (APP-059) to continue engagement with all stakeholders through the MNEF which, which includes offshore wind energy developers. The Applicant has consulted with representatives from Ireland and Northern Ireland. Commercial fisheries consultation with key local and regional fisheries stakeholders has been undertaken throughout the pre-application phase commencing in June 2021 and included representatives from the following organisations: Irish South and East Fish Producers Organisation, Anglo-North Irish Fish Producers Organisation, and Northern Ireland Fish Producers' Organisation. The Applicant has undertaken a transboundary impacts screening (Volume 5, Annex 5.2: Transboundary Impacts Screening (APP-085)) which provides the screening assessment of the potential for transboundary impacts to occur on the environment or interests of other states as a result of the Mona Offshore Wind Project. A number of topics screened in potential transboundary impacts, and these were assessed in the relevant chapters of the Environmental Statement (see section 1.9 of Volume 5, Annex 5.2: Transboundary Impacts Screening (APP-085)).
OD-021.9	A key component of the marine area consent process (i.e. a separate seabed licence process issued by the Maritime Area Regulatory Authority in Ireland in the western Irish Sea) includes a requirement for each renewable energy project to have a Rehabilitation Schedule supported by a decommissioning bond. Its purpose is to ensure there are suitable plans/ protocol in place for the end-of-life/ decommissioning phase of the projects. Therefore, it is recommended that a similar type of approach is implemented by the Planning Inspectorate.	Section 105 of the Energy Act 2004 requires the Mona Offshore Wind Project to be decommissioned at the end of the operations and maintenance phase. 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. In addition, Requirement 20 (Schedule 2, draft development consent order (PDA-003)) requires a written decommissioning programme to be submitted to the Secretary of State prior to commencement of offshore works. In relation to onshore decommissioning works, Requirement 21 (Schedule 2, draft development consent order (PDA-003)) requires a written scheme of decommissioning (including a code of construction practice to be submitted to the relevant planning authority at least six months before onshore decommissioning works commence. The scope of the decommissioning works would be determined by the relevant legislation and guidance at the time of decommissioning.
OD-021.10	It is hoped that the above comments will be of some assistance to the Planning Inspectorate and should you have any queries, please don't hesitate to contact me.	The Applicant notes Meath County Council's response.