Partners in UK offshore wind

MONA OFFSHORE WIND PROJECT

Response to Written Representations

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Image of an offshore wind farm

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Glossary

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

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

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

Acronyms

Acronym	Description
AfL	Agreement for Lease
BEIS	Department for Business, Energy and Industrial Strategy
BNG	Biodiversity net gain
CBRA	Cable Burial Risk Assessment
CMS	Construction Method Statement
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
EWG	Expert Working Group
FLCP	Fisheries Liaison and Co-existence Plan
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
SMZ	Scallop Mitigation Zone
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 Applicant's response to Written Representations

1.1 Introduction

1.1.1.1 Details of the Applicant's response to each of the Written Representations (WRs) are set out in the subsequent sections of this document and its appendices.

1.1.1.2 The Applicant has numbered the WRs in line with the Planning Inspectorate's document library, with subsequent paragraph number e.g. REP1-050.1, REP1-051.1 etc.

2 RESPONSES TO WRITTEN REPRESENTATIONS

2.1 Defence Infrastructure Organisation (Ministry of Defence)

Table 2.1: REP1-054 - Defence Infrastructure Organisation

Reference	Written Representation Comment	Applicant's response
REP1-054.1	The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System. The proposed development would comprise up to 96 wind turbines, each with a maximum height to blade tip of up to 364 metres above Lowest Astronomical Tide (LAT), the development would be located approximately 28.2km from the north coast of Wales. Offshore infrastructure would include up to 360 km of offshore export cables, 50 km of interconnector cables and 325 km of inter-array cables. The onshore infrastructure would consist of up to four circuits. The cables would be buried in up to four trenches and would connect to an onshore High Voltage Alternating Current (HVAC) substation (the Onshore Substation). From the Onshore Substation, a 400kV Grid Connection Corridor will extend to the Bodelwyddan National Grid substation. The principal concerns of the MOD with respect to this proposed wind farm relate to the impact of the development on the operation and capability of air traffic control radar systems, and the potential to create a physical obstruction to air traffic movements. At this time the MOD must object to the proposed development on the basis that the scheme would have a significant and detrimental impact on the effective operation and capability of air traffic control radar deployed at BAE Warton.	The Applicant notes the DIO's comments and objection on the basis that Mona Offshore Wind Project would have a significant and detrimental impacts on BAE Warton.

Reference	Written Representation Comment	Applicant's response
REP1-054.2	Air Traffic Control (ATC) Radar The turbines would be 61.5 km from, detectable by, and would cause unacceptable interference to the ATC radar used by BAE Warton. Wind turbines have been shown to have detrimental effects on the performance of Primary Surveillance Radars. These effects include the desensitisation of radar in the vicinity of the turbines, shadowing and the creation of "unwanted" aircraft returns which air traffic controllers must treat as aircraft returns. The desensitisation of radar could result in aircraft not being detected by the radar and therefore not presented to air traffic controllers. Controllers use the radar to separate and sequence both military and civilian aircraft, and in busy uncontrolled airspace radar is the only sure way to do this safely. Maintaining situational awareness of all aircraft movements within the airspace is crucial to achieving a safe and efficient air traffic service, and the integrity of radar data is central to this process. The creation of "unwanted" returns displayed on the radar leads to increased workload for both controllers and aircrews. Furthermore, real aircraft returns can be obscured by a turbine's radar return, making the tracking of both conflicting unknown aircraft and the controllers' own traffic much more difficult. Our assessments have determined that, when operational, the proposed wind farm would cause unacceptable and unmanageable interference to the effective operation of air traffic control radar deployed at BAE Warton.	Volume 4, Chapter 1: Aviation and radar (APP-075) initially predicted a potential effect on the primary surveillance radar (PSR) at Warton Aerodrome, as set out in Table 1.5 of APP-075. However, due to the Defence Infrastructure Organisation (DIO) not raising a concern against effects on BAE Systems Warton Aerodrome (Warton Aerodrome) in response to the statutory consultation on the PEIR, the Applicant did not undertake a detailed impact assessment for Warton Aerodrome in APP-075. However, based on the latest position of DIO set out in their written representation (REP1-054), the Applicant accepts the potential for significant effects on the PSR at Warton Aerodrome. As the Applicant explained during agenda item 7 (Civil, Military Aviation and Defence Interests) of Issue Specific Hearing 2 (Issue specific hearing 2 summaries F01 (REP1-010)), the DIO confirmed its objection to the Applicant by letter on 24 June 2024. Following this, the Applicant met with Warton Aerodrome on 22 July 2024 to discuss potential mitigation requirements. Warton Aerodrome confirmed that they are in the process of implementing a new PSR which is expected to be online by the end of 2024 (subject to site acceptance and flight trials). Warton Aerodrome has indicated that mitigation is likely to include as a minimum; optimisation of the radar for Mona Offshore Wind Project, flight trials and a safety case to the Civil Aviation Authority. Warton Aerodrome anticipate being in a position to provide further information by mid-October 2024. The Applicant will continue to engage with the DIO and Warton Aerodrome and will provide an update to the Examining Authority at Deadline 3.
REP1-054.3	Physical Obstruction In this case the development falls within Low Flying Area 17 (LFA 17). Within these areas fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. The addition of turbines in this location would introduce a physical obstruction to low flying aircraft operating in the area.	The Applicant notes the DIO's comments. Low Flying Area 17, part of the UK Low Flying System, covers Cumbria (Lake District) and the Irish Sea as explained in section 1.2.3 of Volume 8, Annex 1.1: Aviation and radar technical report (APP-181). Section 1.9.2 of Volume 4, Chapter 1: Aviation and radar (APP-075) considered effects on military and other low flying operations during construction, operations and maintenance and decommissioning phases. With the implementation of an appropriate aviation lighting scheme installed specifically to meet the DIO requirements (see response to REP1-054.4 below), the

Reference	Written Representation Comment	Applicant's response
		assessments concluded effects no worse than minor adverse significance, which is not significant in EIA terms. The Statement of Common Ground (SoCG) with the DIO submitted at Deadline 2 (Document reference: S_D2_9) reflects agreement between the parties on the inclusion of a requirement for aviation lighting to address this matter.
REP1-054.4	In the event that the applicant is able to overcome the objections listed above, MOD would require that conditions are added to any consent issued requiring the submission, approval and implementation of an aviation lighting scheme, and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction. The applicant has acknowledged the MOD requirement for MOD accredited aviation safety lighting in table 1.16 in Volume 4, Chapter 1, Aviation and Radar of the Offshore Environmental Statement (February 2024).	The Applicant notes the DIO's comments. Schedule 2, Requirement 3 of the Draft Development Consent Order (C1 Draft Development Consent Order F04) secures the implementation of an aviation lighting scheme agreed with the DIO. Moreover, lighting installed specifically to meet DIO aviation safety requirements must remain operational for the life of the authorised project unless otherwise agreed with the DIO. Additionally, the Applicant must provide the DIO with the maximum height and co-ordinates of wind turbine generators and offshore substation platforms, notification of commencement of construction and completion of construction and the expected date any wind turbine generators are brought into use. The SoCG with the DIO submitted at Deadline 2 (Document reference: S_D2_9) reflects agreement between the parties on the inclusion of a requirement for aviation lighting to address this matter.
REP1-054.5	For the avoidance of any doubt, MOD objects to the proposal on the grounds of the unacceptable impact that the development would have on: • air traffic control radar system sited at BAE Warton. The MOD continues to work with the applicant to produce a statement of common ground which will be submitted in due course.	The Applicant notes DIO's objection and can confirm that the Applicant and the Defence Infrastructure Organisation have prepared an initial Statement of Common Ground submitted into the Examination at Deadline 2 (Document reference: S_D2_9).

2.2 National Grid Electricity Transmission plc

Table 2.2: REP1-055 - National Grid Electricity Transmission plc

Reference	Written Representation Comment	Applicant's response
REP1-055.1	This written representation is submitted on behalf of National Grid Electricity Transmission plc (NGET) in response to the application by Mona Offshore Wind Limited (Promoter) for a development consent order (DCO) for the Mona Offshore Wind Farm (Proposed Development).	The Applicant notes the response.
REP1-055.2	NGET infrastructure 2.1 As set out in NGET's relevant representation dated 3 May 2024, NGET has a number of assets that form an essential part of the electricity transmission network in England and Wales either within, or in close proximity to, the Proposed Development. This includes the existing Bodelwyddan substation, various overhead lines and underground apparatus.	The Applicant notes the response.
REP1-055.3	2.2 Additionally, NGET is bringing forward a project to upgrade the existing Bodelwyddan substation in the near future (the Bodelwyddan Upgrade). These upgrade works comprise the physical extension of the Bodelwyddan substation and associated works and infrastructure (including new overhead line gantries and the related diversion of an existing gas pipeline to facilitate the substation extension), as well as associated overhead line works to the south of the existing substation.	The Applicant notes the response.
REP1-055.4	2.3 The Bodelwyddan Upgrade is critical infrastructure to enable the connection of multiple projects at this location, with the Proposed Development being only one of a number of projects requiring a future connection to the Bodelwyddan substation. NGET has entered into connection agreements with each of the relevant customers obligating NGET to provide a connection for each of their individual projects. A similar connection agreement is in place with the Promoter.	The Applicant notes the response.

Reference	Written Representation Comment	Applicant's response
REP1-055.5	2.4 Separate to the Bodelwyddan Upgrade, a scheme of reconductoring works is also due to be undertaken to the overhead line to the south of the existing substation. This will involve reconductor works to the existing three ended circuits (Bodelwyddan – Connahs Quay – Pentir 1 &2) from towers 4ZB167 to 4ZB255 as part of larger North Wales reinforcement works to facilitate future customer connections anticipated in the area. Like the Bodelwyddan Upgrade, these are critical works which cannot be prejudiced by any of the projects that need to connect at this location.	The Applicant notes the response.
REP1-055.6	3 Protective provisions 3.1 In light of the above, NGET require protective provisions to be included within the DCO to ensure that its existing and future assets and interests are adequately protected, as well as to ensure compliance with relevant safety standards.	The Applicant is engaging in discussions with NGET and updates on progress have been provided in land rights tracker (S_PD_5 F04).
REP1-055.7	3.2 In particular, NGET seeks to secure the same set of protective provisions that were included in the recently granted Awel y Môr Offshore Wind Farm Development Consent Order (the AYM DCO). The Awel Y Môr project will be connecting to Bodelwyddan Substation and so will affect the same existing and future NGET infrastructure as the Proposed Development if it is consented.	The Applicant notes the response.
REP1-055.8	3.3 As such, NGET considers that it is reasonable and appropriate for the safeguards and protections secured for NGET's benefit in the AYM DCO should be the same here. This is particularly important from NGET's perspective to ensure consistency across the various connectee projects that will be connecting into its existing and future infrastructure at this location, including in order to ensure that the future works set out above are not prejudiced by any particular connectee project.	The Applicant notes the response.
REP1-055.9	3.4 For completeness, we include a copy of the AYM DCO at Appendix 1. The protective provisions for NGET's benefit form Part 3 of Schedule 9 of the AYM DCO.	The Applicant notes the response.

Reference	Written Representation Comment	Applicant's response
REP1-055.10	4 Status of negotiations NGET's solicitors Addleshaw Goddard LLP have been engaging with the Promoter's solicitors and await comments on the protective provisions that have been sent to them. Whilst the Promoter has yet to confirm that the principle of adopting the protective provisions from the AYM DCO is agreed, it is difficult to see why this would be contentious given the clear recent precedent. However, until satisfactory agreement has been reached with the Promoter, NGET must continue to reserve the right to make further submissions to the examination at a later date.	The Applicant is engaging in discussions with NGET and updates on progress have been provided in land rights tracker (S_PD_5 F04).

2.3 Network Rail

Table 2.3: REP1-057 - Network Rail

Reference	Written Representation Comment	Applicant's response
REP1-057.1	We are instructed by Network Rail Infrastructure Limited ("Network Rail") in relation to the application made by Mona Offshore Wind Ltd ("the Applicant") for development consent to construct and operate the Mona Offshore Wind Project development ("the DCO Scheme"). These submissions are prepared in order to respond to the Secretary of State's Rule 6 letter dated 23 July 2024 which requested a written representation to be submitted. Network Rail's position is substantially set out in its Section 56 Representation submitted on 3 May. Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns and operates Great Britain's railway network and has statutory and regulatory obligations in respect of it, therefore any proposed development which is adjacent to and interfaces with the railway network or potentially affects Network Rail's land interest will be carefully considered. The DCO Scheme includes cables that interface with the railway network and therefore will require certain standard protections for the benefit of the railway. Network Rail does not object in principle to the DCO Scheme but it does require its Protective Provisions being included in the DCO Scheme and entry by the Applicant into an Asset Protection Agreement and a Framework Agreement with Network Rail.	The Applicant notes the response and can confirm it is in discussions with Network Rail regarding the Protective Provisions and a Framework Agreement. Further details on progress is set out within the land rights tracker (S_PD_5 F04).
REP1-057.2	Network Rail recognises the protective provisions for its benefit that are included in Part 8 of Schedule 10 to the draft DCO. Network Rail's standard Protective Provisions must be included on the face of the Order. Network Rail and the Applicant are still agreeing the final form of the Protective Provisions to be appended to the Framework Agreement, particularly with regard to the Electro Magnetic Interference	The Applicant can confirm the position as outlined.

Reference	Written Representation Comment	Applicant's response
	("EMI") provisions, their relevance and application to the DCO Scheme and the necessary theoretical and practical testing that Network Rail require the Applicant to undertake to determine the levels of EMI and carry out any required mitigation where EMI is found.	
REP1-057.3	Network Rail notes that the Promoter recognises the role that agreement between the parties will play in setting out the relationship between the parties as regards to the implementation of the powers under the DCO, once made. The parties are currently negotiating a Framework Agreement to manage the direct interface that the DCO Scheme has with the operational railway. The Framework Agreement must append the following documents: Network Rail's Protective Provisions, the Asset Protection Agreement (once completed) and the Property Agreement (once completed). It is Network Rail's position that it will not withdraw its objection until the Framework Agreement has been completed.	The Applicant has been in recent communications with Network Rail. The Applicant understands that a completed Asset Protection Agreement and Property Agreement does not need to be appended to the Framework Agreement.
REP1-057.4	The Property Agreement will take the form of a Grant of Lease. The form of the Property Agreement is currently being negotiated between Network Rail and the Applicant's solicitors. The parties are currently agreeing rental figures and plans are being prepared, good progress is being made to agree the final form of the Property Agreement.	Further details on progress is set out within the land rights tracker (S_PD_5 F04).
REP1-057.5	It is noted that works detailed in Schedule 1 to the draft DCO relate to works on or adjacent to Network Rail's existing operational railway and railway infrastructure. Network Rail requires that this work is covered by the Asset Protection Agreement/Structures Agreement to be entered into between the Applicant and Network Rail. This agreement will ensure the appropriate and necessary technical, engineering and safety requirements for working on, over or near Network Rail's operational railway are applied to the DCO Scheme. Due to the location of the Applicant's proposed works, Network Rail requires an Asset Protection Agreement in order to carry out its statutory duty.	The Applicant notes the response.

Reference	Written Representation Comment	Applicant's response
REP1-057.6	It is acknowledged that discussions with the Applicant to date are on-going. However the Applicant's position has not changed since its s.56 representation. Network Rail still require the following criteria to be met, in order to withdraw the objections made above:- 1. Network Rail's standard form of the protective provisions are to be included in the draft DCO for the DCO Scheme; 2. the Applicant enters into a Framework Agreement to provide formal protection for Network Rail's statutory undertaking; 3. any required Property Agreement and Asset Protection Agreements/Structures Agreement or any other required agreements are entered into by the Applicant in respect of the acquisition of addressing both the acquisition of rights over Network Rail's operational land and carrying out of works on or adjacent to Network Rail's operational land; and 4. Network Rail is granted with clearance and any necessary regulatory consents. Entry into any of the agreements above is subject to internal clearance being granted within Network Rail following internal consultation with affected stakeholders across the business.	The Applicant will continue to work with Network Rail to agree the points listed. The Applicant can confirm that it received a Certificate of Approval for Stage 2 (Technical) Clearance from Network Rail on the 1st May 2024. Please also see REP1-057.3 regarding the Framework Agreement.

2.4 Awel y Môr Offshore Wind Farm Limited

Table 2.4: REP1-061 – Awel y Môr Offshore Wind Farm Limited

Reference	Written Representation Comment	Applicant's response
REP1-061.1	1. INTRODUCTION 1.1. Awel y Môr Offshore Wind Farm Limited (the Interested Party) is the developer of the Awel y Môr Offshore Wind Farm project (AyM) to be located off the coast of North Wales. 1.2. AyM was consented by way of a development consent order made by the Secretary of State for Energy Security and Net Zero on 19 September 2023 (AyM DCO), pursuant to which the Interested Party is the undertaker with powers to construct and operate AyM. 1.3. AyM is planned to be operational before 2030 and will become Wales' largest renewable energy project. 1.4. The Interested Party is also the holder of an electricity generation licence granted by Ofgem on 28 January 2021. 1.5. The Interested Party made a relevant representation (examination library reference RR-003) to safeguard its interests and ensure appropriate protections are included in the draft development consent order (DCO) (examination library reference PDA-003). Specifically, the Interested Party would object to:- 1.5.1. the Proposed Development being carried out in close proximity (including within) the Order limits of the AyM DCO unless and until suitable protective provisions and any	The Applicant notes the response.

Reference	Written Representation Comment	Applicant's response
	necessary related agreements have been secured to its satisfaction; and 1.5.2. the grant and exercise of powers of compulsory acquisition and temporary possession to carry out the Proposed Development, and any related or ancillary powers, within and in the vicinity of the Order limits of the AyM DCO.	
REP1-061.2	2. INTERACTION BETWEEN THE PROPOSED DEVELOPMENT AND THE AWEL Y MÔR OFFSHORE WIND FARM 2.1. The offshore export cable corridor for the Proposed Development crosses the area over which the Interested Party holds an agreement for lease from The Crown Estate. 2.2. The Proposed Development will also have other interactions with AyM offshore, including potential construction and operational-related interfaces and impacts. 2.3. AyM will connect into the National Grid Bodelwyddan substation, the same grid connection point as the Proposed Development (which will connect into a proposed extension of the same – as described further in 2.4 below). There is an extensive overlap between the land within the AyM DCO Order limits and the Proposed Development, including overlapping works and related compulsory acquisition and temporary possession powers. 2.4. Separately, National Grid is progressing a planning application for the extension of Bodelwyddan substation to facilitate the connection of new projects including the Proposed Development. At the time of submission of this representation a planning application for the Bodelwyddan substation extension has not yet been submitted. Although AyM is the furthest advanced of the three projects, it is not possible at this stage to confirm in which order the projects will be constructed (or whether construction of some or all of	The Applicant notes the response.

Reference	Written Representation Comment	Applicant's response
	the projects will happen in parallel) and therefore consideration needs to be given to the mitigation and other measures that would be required in different construction scenarios.	
REP1-061.3	2.5. The Awel y Môr onshore cable route and connection into Bodelwyddan substation is shown on sheet 11 of the certified AyM Works Plan and sheet 10 of the certified AyM Land Plan (Onshore), copies of which have been enclosed with this representation as Appendices 1 and 2. 2.6. Work Nos. 25 (part of the onshore cable corridor) and 26 (electrical connection works) forming part of the Proposed Development and shown on the Works Plan – Onshore (examination library reference: AS-003) and described in the draft DCO (examination library reference: PDA-003) overlap extensively with Work Nos. 36 (part of the onshore cable corridor), 39 (construction haul road), 39A (temporary construction compound (TCC) and laydown area) and 40 (electrical connection works) as authorised by the AyM DCO. 2.7. In addition, Work Nos. 30 and 38 (permanent access) forming part of the Proposed Development overlap with Work Nos. 39 and 41 (operational accesses) as authorised by the AyM DCO.	The Applicant notes the response. The Applicant would like to clarify as per Appendix To Response To Hearing Action Point: Mona Offshore Wind Project And Awel Y Môr Offshore Wind Farm Works Plans Overlays (REP1-019), that Mona Work No. 26 only overlaps with AyM Work Nos. 39, 39A and 40. It does not overlap with AyM Work No. 36. Additionally, it should be clarified that Mona Work No. 38 also overlaps with AyM Work No. 40, and that Mona Work No. 27 overlaps with AyM Work Nos. 39 and 41.
REP1-061.4	2.8. The extent of overlap between the Proposed Development and AyM in the vicinity of the National Grid Bodelwyddan substation is shown on the plan which the Interested Party understands is to be referred to as 'D1_5.7_Mona_OWF and Awel y Mor OWF Works Plans Overlays'. This plan has been produced by the Applicant in consultation with the Interested Party for submission at deadline 1 in response to hearing action point 15 following issue specific hearing 2 (ISH2). 2.9. Work No. 25 of the Proposed Development includes the installation of cables and a TCC. As was highlighted in the	See Appendix To Response To Hearing Action Point: Mona Offshore Wind Project And Awel Y Môr Offshore Wind Farm Works Plans Overlays (REP1-019). The Applicant can confirm that it has received a draft set of protective provisions and is reviewing them. The Applicant is engaged in ongoing discussions with AyM to reach an agreed position.

Reference	Written Representation Comment	Applicant's response
	Interested Party's statutory consultation response to the Proposed Development dated 26th May 2023, any proposals to locate a TCC or cables within the AyM DCO boundary and/or above the installed 400kV export cable of AyM require further detailed consideration. 2.10. In particular, the Interested Party seeks an assurance from the Applicant that it will use its best endeavours to avoid crossing the AyM 400kV export cable. In this regard, and as submitted on behalf of the Interested Party during ISH2, Figure 1.12 in the Onshore Crossing Schedule (examination library reference: APP-083) indicates that provision has been made for two crossings (one trenched, one trenchless) in the northern area of Work Nos. 25 and 26 and parallel to the National Grid Bodelwyddan substation.	
REP1-061.5	2.11. The Interested Party raised the omission of the prospective location of the AyM 400kV export cable from the crossing schedule during ISH2 and understands the Applicant's position to be that the crossing schedule only describes existing features. This is of particular concern to the Interested Party as the crossings described in 2.10 above are proposed in the likely vicinity (at the time of writing) of the AyM 400kV export cable. Although detailed design of the AyM 400kV cable corridor has not yet been completed, the Interested Party and the Applicant, together with National Grid and other third parties connecting into the National Grid Bodelwyddan substation, have met regularly to discuss the interaction of their respective projects and the Interested Party's likely cable route is known by the Applicant. 2.12. The Interested Party would therefore seek further clarity from the Applicant as to its assumed onshore cable route and grid connection location and a commitment to use best endeavours to avoid crossing the AyM 400kV export cable. The Interested Party would wish to highlight that in designing its works and in engagement with the Applicant and National Grid, it has sought to avoid the need for a crossing of the	

Reference	Written Representation Comment	Applicant's response
	Proposed Development and to leave the Applicant sufficient space to construct its export cable and grid connection without crossing the Interested Party's proposed export cable route.	
REP1-061.6	2.13. In the event that both wind farm projects are carrying out construction works in the vicinity of the Bodelwyddan substation, and the Interested Party is still using a construction haul road which interacts with the corridor of the export cables forming part of the Proposed Development, the Interested Party seeks a commitment from the Applicant that in those circumstances the Applicant would employ trenchless crossing techniques to cross the AyM haul road so as not to interrupt or impede AyM construction works.	
REP1-061.7	3. PROTECTIVE PROVISIONS 3.1. In the light of the interactions and overlaps described in section 2 above, it will be necessary for the DCO for the Proposed Development to include protective provisions for the benefit of AyM. The draft DCO as submitted does not include any such bespoke protective provisions. 3.2. The Interested Party provided a set of protective provisions to the Applicant on 3 July 2024 for comment and awaits its response. 3.3. In the event that it is not possible to reach agreement with the Applicant, the Interested Party would reserve its right to request and attend a compulsory acquisition hearing or issue specific hearing to make submissions to the examining authority on the required form of the protective provisions and any necessary amendments to the draft DCO. If it becomes necessary to attend one or more hearings the Interested Party reserves its right to provide further written material in support of any matters remaining in dispute between the parties at that stage.	The Applicant notes the response.

2.5 Bodorgan Marine Limited

Table 2.5: REP1-062 – Bodorgan Marine Limited

Reference	Written Representation Comment	Applicant's response
REP1-062.1	1. By way of introduction to this IP: a. Bodorgan Marine is a relatively new entity established, among other purposes, to take advantage of the potential for offshore aquaculture in the waters of North Wales. b. Its founder, Sir George W. Meyrick Bt., Is a former Chancellor of Bangor University and a significant Anglesey littoral landowner. 2. The essence of these Written Representations: the Applicant has not discharged and is failing to discharge its statutory and policy obligations in relation to how it addresses fisheries/mitigation activities, and in particular co-location, consultation and the enhancement of fisheries in Welsh waters.	The Applicant notes the response from Bodorgan Marine Limited. The Mona Offshore Wind Project has developed an Outline Fisheries Liaison and Co-existence Plan (FLCP) (APP-199) with reference to key guidance outlined within the Welsh National Marine Plan (WNMP). The WNMP defines co-location as "*a subset of co-existence and is where multiple developments, activities or uses co-exist in the same place by sharing the same footprint or area*". The Applicant has made significant commitments in the design of the project to facilitate co-existence and co-location and allow for continued fishing activity within the Mona Array Area and Offshore Export Cable Corridor. These commitments are secured in the Outline FLCP (APP-199) with the requirement for the Final Fisheries Liaison and Co-existence Plan (which must accord with the commitments in the Outline FLCP (APP-199)), secured within the deemed marine licence under Schedule 14 of the draft Development Consent Order (DCO) (C1 F04) and expected to be secured within the standalone marine licence.
REP1-062.2	3. Brief details of where the Applicant has gone wrong: a. The Applicant has misunderstood the meaning of co-location as this term is understood in Welsh waters. The Parties disagree on this point.	The Applicant began engagement with key commercial fishing stakeholders identified by a regional Fishing Industry Representative (FIR) in June 2021. Consultation has been ongoing since 2021 as summarised in Table 6.5 of Volume 2, Chapter 6: Commercial fisheries (APP-058) and detailed in Appendix H of the Technical Engagement Plan Appendices - Part 2 (F to M) (APP-042). This included post-scoping discussions in Autumn 2022 on specific requirements to allow access to and continued fishing within Mona Array Area and Offshore Cable Corridor for the key existing fisheries in these areas. This engagement considered the need for avoidance of infrastructure over core queen scallop grounds, sufficient spacing between infrastructure to allow continued access and fishing, orientation of wind turbines with dominant towing directions, burying of cables and minimising the use of cable protection. In Winter 2022, further engagement was undertaken specifically with scallop fishing stakeholders on the potential for a Scallop Mitigation Zone (SMZ). The commitment to a SMZ was subsequently included in the Outline FLCP (APP-199). During the Environmental Impact Assessment (EIA) process undertaken for the Mona Offshore Wind Project, the Applicant did not identify existing aquaculture
REP1-062.3	b. The Applicant has given no thought to the potential for new forms of fishing and certainly has given no thought to the potential of co-located aquaculture which is recognised to be the form of co-location with greatest potential. The Parties appear to agree on this point.	
REP1-062.4	c. The Applicant has not consulted with the well-established North Wales aquaculture industry. The Parties agree on this point.	
REP1-062.5	d. The Applicant's mitigation proposals have not been designed to enhance fisheries. What the Applicant's mitigation proposals, rather, do is take steps to preserve part	

Reference	Written Representation Comment	Applicant's response
	of the status quo. The Parties appear to disagree on this point.	operations that overlapped with the Mona Array Area and Offshore Export Cable Corridor Order Limits (as shown on Figure 1.6 of Volume 5, Annex 5.1: Cumulative effects screening matrix (APP-084)), and which could therefore benefit from co-location. Official landings data included landing statistics by International Council for the Exploration of the Sea (ICES) rectangle for United Kingdom (UK) and Isle of Man vessels (all vessel sizes), Marine Management Organisation (MMO) Landings statistics by port (all vessel sizes), Vessel Monitoring Systems (VMS) data for UK and Isle of Man vessels (≥15 m). The Natural Resources Wales (NRW) "Estimated relative fishing activity within Welsh waters only" dataset from the Welsh National Marine Plan did not include evidence of species associated with aquaculture activities being landed within the Mona Offshore Wind Project's commercial fisheries study area (defined in Figure 6.1 of Volume 2, Chapter 6: Commercial fisheries (APP-058)). While the Applicant did not make specific reference to the Cefas report "Welsh National Marine Plan: A review of the potential for co-existence of different sectors in the Welsh Marine Plan Area" (Mengo *et al*., 2020) in the commercial fisheries assessment, this report is intrinsically linked to the Welsh National Marine Plan (WNMP). Relevant policies within the WNMP were identified within Volume 2, Chapter 6: Commercial fisheries (APP-058). The Outline FLCP (APP-199) has also been developed with reference to the WNMP. The Applicant has included the Cefas report (Mengo et al. 2020) in the references section of this document. The Applicant notes that Bodorgan Marine Limited did not submit a response to the Mona Offshore Wind Project statutory consultation in June 2023. However, the Applicant has consulted with the Welsh Government Marine and Fisheries Division, the Welsh Fishermen's Association (WFA) and individuals associated with the Menai Strait Fishing Order Management Association and Menai West Fishery Orders Applicants. Due to the importance of parts of the Mona Array Area and Offshore Export Cable Corridor to scallop vessels, discussions regarding co-location and co-existence have been focussed on this fishery. Similar discussions have also been held with respect to other commercial fisheries receptor groups active in this area, including static gear (potting) vessels. The Applicant has made significant commitments to all commercial fisheries receptor groups in the design of the project to facilitate co-existence and co-location and to enable continued fishing activity within the Mona Array Area and Offshore Export Cable Corridor.
REP1-062.6	4. As a first and essential step we urge the Applicant to make contact with the North Wales aquaculture community and engage in proper consultation. We suggest that Professor Lewis Levay of Bangor University and Mr. James Wilson of DeepDock would be appropriate representatives of the North Wales aquaculture industry.	
REP1-062.7	5. We ask PINS to add the 2020 CEFAS Report "Welsh National Marine Plan: A review of the potential for co-existence of different sectors in the Welsh Marine Plan Area", to the document library. We understand that the Applicant has no objections to this proposal.	

Reference	Written Representation Comment	Applicant's response
		The Applicant would welcome engagement with the North Wales aquaculture industry and would be happy to set up a meeting to hear their views on the Mona Offshore Wind Project.

2.6 Maritime and Coastguard Agency

Table 2.6: REP1-068 – Marine Coastguard Agency

Reference	Written Representation Comment	Applicant's response
REP1-068.1	Examination Timetable – Deadline 1 – Written Representation The MCA's remit for Offshore Renewable Energy Installations (OREIs) is to ensure that the safety of navigation is preserved, and our Search and Rescue (SAR) capability is maintained, whilst progress is made towards government targets for renewable energy. The Navigation Risk Assessment (NRA), the shipping and navigation chapter of the Environmental Impact Report and draft DCO have been reviewed and we would like to comment as follows: F6.7.1 Environmental Statement Volume 6, Annex 7.1 Navigation Risk Assessment (APP-098) and F2.7 Environmental Statement Volume 2, Chapter 7 Shipping and Navigation (APP-059). Mona Offshore Wind Limited has undertaken a detailed Navigation Risk Assessment (NRA) in accordance with MCA guidance MGN (Marine Guidance Note) 654 and NRA risk assessment methodology. We are satisfied that appropriate traffic data has been collected in accordance with MGN654, which includes three 14-day marine vessel traffic surveys in December 2021, June/July 2022, and October/November 2023 supplemented by 12 months of AIS data from 2022. Key and appropriate stakeholders were identified, and the MCA is content that suitable consultation took place via two hazard identification workshops, dedicated meetings and bridge simulation sessions. A completed MGN654 Checklist has been provided as part of the NRA, and we are content the recommended NRA process has been followed.	The Applicant notes this response and confirms that the adequacy of the methodology, consultation and data collection for Volume 2, Chapter 7: Shipping and navigation (APP-059) and Volume 6, Annex 7.1: Navigation Risk Assessment (APP-098) have been agreed with the MCA as part of the initial SoCG submitted at Deadline 1 (REP1-029).
REP1-068.2	1. Navigable sea room, collision and allision risks Following extensive consultation from the applicant with key stakeholders which included a multi-day HAZID workshop	The Applicant notes this response and confirms that the adequacy of the methodology, consultation and data collection have been agreed with the MCA as part of the initial SoCG submitted at Deadline 1 (REP1-029).

Reference	Written Representation Comment	Applicant's response
	and bridge simulation exercises to assess the affect the development may have on shipping, in particular ferry routes, some navigational safety risks were found to be unacceptable. This led to a decision by the applicant to reduce the northern boundary to increase the sea room between Mona and Morgan wind farms to 6NM. The southern boundary was also amended to increase the distance to traffic exiting the Liverpool Bay Traffic Separation Scheme to 2NM. Additional bridge simulation exercises and a second HAZID workshop were then undertaken which resulted in the reduced perceived collision and allisions risk to an acceptable level with mitigations.	
REP1-068.3	2. Shipping and Navigation Mitigation Measures The list of applied (embedded) risk controls in Table 1.10 of the NRA and adopted additional risk controls in Table 1.43 of the NRA, are appropriate for reducing safety risks to As Low As Reasonably Practicable (ALARP). It should be noted that the requirement for an Emergency Response Cooperation Plan (ERCoP), as referenced in Table 13-3 of the ES Chapter 13 Shipping and Navigation, will be secured in the DCO/DML under the condition for complying with MGN654. There will not be a specific condition for the completion of an ERCoP.	The Applicant notes this response and confirms that the findings of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) have been agreed with the MCA as part of the initial SoCG submitted at Deadline 1 (REP1-029). The clarification of the means of securing the ERCoP is noted. In accordance with the MCA's comment the draft DCO submitted at Deadline 2 (C1 Draft Development Consent Order F04) does not include a specific condition relating to the ERCoP and reference is made to compliance with MGN654 as part of Condition 18 and Condition 22 of the deemed marine licence (Schedule 14 of the draft DCO).
REP1-068.4	3. Layout Design The turbine layout design must be compliant with MGN654 and it will require MCA and Trinity House approval prior to construction to minimise the risks to surface vessels, including rescue boats, and search and rescue aircraft operating within the site. MCA will seek to ensure all structures are aligned in straight rows and columns with a minimum of two lines of orientation. The layout commitments for two lines of orientation and a minimum 1400m spacing between structures (NRA paragraph 1.8.9.3) are recognised and welcomed for reducing risks to mariners and SAR aircraft.	The draft development consent order (Document Reference C1 F04) has been updated to include within Condition 18(1)(a), Part 2, Schedule 14 refers to a design plan being submitted to Natural Resources Wales in accordance with the layout principles. A new definition of layout principles has been added to refer to the Environmental Statement - Volume 1, Chapter 3: Project Description (APP-050). The layout principles will therefore be taken into account when the final design plan is being prepared, including the commitment to two lines of orientation along with all the other layout principles. Condition 18(1)(a)(iii) retains the obligation for the layout of the wind turbine generators being in accordance with MGN654.

Reference	Written Representation Comment	Applicant's response
REP1-068.5	4. Marking and Lighting. MCA will seek to ensure the turbine numbering system follows a 'spreadsheet' principle and is consistent with other windfarms in the UK. All lighting and marking arrangements will need to be agreed with MCA and Trinity House. The MCA requires all aviation lighting to be visible 360° and compatible with night vision imaging systems, as detailed in CAP 764 and MGN654 Annex 5.	The Applicant notes this response and confirms that this is secured as part of Condition 18(1)(g) (aids to navigation management plan) and Condition 22 (offshore safety management) of the deemed marine licence (Schedule 14 of the draft DCO submitted at Deadline 2 (C1 Draft Development Consent Order F04).
REP1-068.6	5. Emergency Response and Search and Rescue. There is an expectation that the presence of wind farms will increase the likelihood of the requirement for emergency response, not just from navigational incidents but from other incidents such as medical evacuation or pollution. A SAR checklist based on the requirements in MGN654 Annex 5 will need to be completed in agreement with MCA before construction starts. This will include the requirement for an approved Emergency Response Co-operation Plan (ERCoP). The NRA outlines the most likely incidents which may result in a required emergency response though does not fully consider the additional demand likely caused by the presence of personnel offshore, as has been experienced from some other windfarms of comparable size. Since the operations and maintenance strategy is not yet clear or the type of vessels utilised (e.g. crew transfer vessels or service operations vessels), it is difficult to determine what resource and capability will be on site and what the availability of this will be at this stage. There may be situations requiring a SAR response where project vessels are unavailable due to weather or crew rotation etc. It should be noted that the presence of a windfarm diminishes the SAR capability and even with an MGN654 compliant layout, there are still no guarantees of an effective SAR response and therefore consideration should be given as to how the windfarm will mitigate this reduction.	The Applicant notes this response and confirms that this mitigation associated with Search and Rescue is secured as part of Condition 18 (Pre-construction plans and documentation) and Condition 22 (offshore safety management) of the deemed marine licence (Schedule 14 of the Draft DCO submitted at Deadline 2 (C1 Draft Development Consent Order F04). Both Sections 1.8 and 1.9 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) provide a detailed assessment of the likelihood and consequences of different hazardous scenarios which might necessitate a Search and Rescue response. Whilst the presence of personnel working as part of the Mona Offshore Wind Project during construction, operations and maintenance and decommissioning may result in an increase in Search and Rescue demand, sufficient mitigation will be put in place to manage this. At the time of Application, it is not known the specifics of either the construction or operations and maintenance programme. As identified within Paragraph 1.8.9.6 of the NRA (APP-098), it is likely that the first responders to any incident would be Mona Offshore Wind Project vessels avoiding the need for separate SAR presence. These vessels will have appropriate rescue and medical capability and will be set out within the ERCoP, secured as part of Condition 22 of the deemed marine licence (Schedule 14 of the draft DCO (PDA-003)). Notwithstanding these points, whilst it is recognised that the Mona Offshore Wind Project may reduce Search and Rescue capability within the eastern Irish Sea, the Mona Offshore Wind Project has committed to both two lines of orientation and minimum spacing of 1,400 m between infrastructure which greatly exceed industry best practice set out in MGN654 Annex 5. On occasions where there are no Mona Offshore Wind Project vessels within the Mona Array Area, these commitments would facilitate safe and effective Search and Rescue missions. Therefore, the

Reference	Written Representation Comment	Applicant's response
		Applicant believes that the above measures will ensure impacts to Search and Rescue are reduced to As Low As Reasonably Practicable.
REP1-068.7	During SAR discussions, particular consideration will need to be given to the implications of the site size and location. Attention should be paid to the level of radar surveillance, AIS and shore-based VHF radio coverage and give due consideration for appropriate mitigation such as radar, AIS receivers and in-field, Marine Band VHF radio communications aerial(s) (VHF voice with Digital Selective Calling (DSC)) that can cover the entire wind farm site and surrounding areas. It would have been helpful for the NRA to consider radio reception interference caused by larger turbines; however we would expect radio surveys to be conducted pre-construction and post-construction to confirm and compare levels of coverage. It will also be expected that Mona Offshore Wind Limited will provide the AIS and VHF capability to the MCA with direct access to HM Coastguard systems.	The Applicant notes this response and notes that Section 1.8.11 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) states that previous studies have not identified any significant adverse impacts on radio reception from offshore wind farms. The Applicant is unaware of any specific evidence to challenge this. The Applicant confirms that the mitigation associated with Search and Rescue and communications will be secured as part of Condition 22 of the deemed marine licence (Offshore safety management) (Schedule 14 of the draft DCO submitted at Deadline 2 (C1 Draft Development Consent Order F04)). As part of this the Applicant confirms that the requirement for and nature of radio surveys as part of the Search and Rescue Checklist will be discussed with MCA through engagement on the SoCG. The Applicant would not object to provision of access to HM Coastguard to AIS or VHF coverage, providing this can be achieved technically and without creating a security risk. Applicant will discuss this matter with the MCA through engagement on the SoCG.
REP1-068.8	Paragraph 1.5.4.4 (and 4.4.3.1.1 of the CRNRA) confirms that SOLAS obligations require vessels to respond to persons or vessels in distress. It should be noted that vessels should only respond if they are safely able to do so and the presence of turbines may preclude the vessel's ability to safely respond to those in distress.	The Applicant notes this response and confirms that Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) was undertaken in consideration with the relevant sections of SOLAS.
REP1-068.9	Paragraph 1.8.9.4 summarises helicopter response times and it should be noted that tasking times are likely quicker that the 30 minute approximation although it is longer between the hours of 2200 and 0800.	The Applicant suggested that 30 minutes was an average response time, recognising that in some situations there will be variation such as when the helicopter is already airborne or undergoing refuelling.
REP1-068.10	The NRA identifies 1300 charted wrecks in the cumulative study area which could pose a risk of releasing pollution over time and this may require an environmental response. Within the boundaries of a windfarm, emergency response becomes more complex and this must be considered in the Marine Pollution Contingency Plan.	The Applicant notes this response and confirms that the preparation of a Marine Pollution Contingency Plan is secured under Condition (18)(1)(e)(i) in the deemed marine licence (Schedule 14 of the draft DCO submitted at Deadline 2 (C1 Draft Development Consent Order F04)).

Reference	Written Representation Comment	Applicant's response
REP1-068.11	6. Construction scenarios. We would expect to see some form of linear progression of the construction programme avoiding disparate construction sites across the development area, and the consent needs to include the requirement for an agreed construction plan to be in place ahead of any works commencing.	The Applicant notes this response and confirms that construction will only occur within the buoyed construction area as set out in the Aids to Navigation Management Plan which will be prepared post-consent and is secured under Condition 18(1)(g) of the deemed marine licence (Schedule 14 of the draft DCO (PDA-003)). A construction programme and a construction method statement will also be prepared which are also secured under Condition 18(1)(b) and Condition 18(1)(d) respectively within Schedule 14 of the draft DCO submitted at Deadline 2 (C1 Draft Development Consent Order F04).
REP1-068.12	7. Cable Routes. Export cable routes, cable burial protection index and cable protection are issues that are yet to be fully developed. However due cognisance needs to address cable burial and protection, particularly close to shore where impacts on navigable water depth may become significant. Any consented cable protection works must ensure existing and future safe navigation is not compromised. If cable protection measures are required e.g., rock bags or concrete mattresses, the MCA would accept a maximum of 5% reduction in surrounding depth referenced to Chart Datum. This will be particularly relevant where depths are decreasing towards shore and potential impacts on navigable water increase, such as at the HDD location.	The Applicant notes this response and confirms that an Offshore Construction Method Statement which includes a Cable Specification and Installation Plan and cable burial risk assessment is secured under Condition 18(i)(d) of Schedule 14 of the draft DCO submitted at Deadline 2 (C1 Draft Development Consent Order F04). The condition limits the height of cable protection exceeding five percent navigable depth without prior written approval from the Licensing Authority in consultation with the MCA.
REP1-068.13	Should HVDC cables be installed, consideration must be given to the effect of electromagnetic deviation on ships' compasses. The MCA would be willing to accept a three-degree deviation for 95% of the cable route. For the remaining 5% of the cable route no more than five degrees will be attained. We would expect the applicant undertake a desk based compass deviation study based on the specifications of the cable lay proposed and assess the effect of EMF on ship's compasses. MCA may request for a deviation survey post cable installation which will confirm conformity with the consent condition. The applicant should then provide this data to UKHO via a hydrographic note (H102), as they may want a precautionary notation on the appropriate Admiralty Charts (actions at a later stage	The cable envelope for inter-array, interconnector and export cables only includes for High Voltage Alternating Current (HVAC) cables, High Voltage Direct Current (HVDC) cables will not be installed.

Reference	Written Representation Comment	Applicant's response
	depending upon the desk-based study and post installation deviation survey).	
REP1-068.14	8. Safety Zones. The requirement and use of safety zones as detailed in the application is noted, and MCA will comment on the safety zone application once submitted. Safety zones during the construction, maintenance and decommissioning phases are supported. A detailed justification would be required for a 50m operational safety zone, with significant evidence from the construction phase in addition to the baseline NRA required supporting the case. Safety zones triggered by a Service Operation Vessel connecting to a wind turbine will not be supported.	The Applicant notes this response. As set out in the Safety Zone Statement (APP-192), during the operations and maintenance phases, the Applicant only intends to apply for safety zones of 500 m around infrastructure where major maintenance works are being undertaken (for example a blade replacement). Safety zones around service operation vessels connecting to a wind turbine generator or 50 m safety zones around infrastructure not undergoing major maintenance have not been proposed.
REP1-068.15	Additional minor comments on F6.7.1 Environmental Statement Volume 6, Annex 7.1 Navigation Risk Assessment (APP-098): 1.4.7.3 The current guidance on navigation lighting and marking (MGN654), and Search and Rescue lighting (MGN654 Annex 5) was published in April 2021 and January 2024, respectively.	The Applicant notes this updated version and confirms that Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) was undertaken in line with the latest guidance available.
REP1-068.16	1.8.2.4 The NPS EN-3 paragraph references need updating to the corresponding paragraphs in the current version published in November 2023.	The Applicant notes this typographic error and confirms that the latest National Policy Statements updated in November 2023, as referred to in Table 1.1 and Table 1.2 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098), were used as the basis for this assessment. This has been included in the updated Errata document submitted at Deadline 2 (S_PD1_1 F03).
REP1-068.17	1.8.9.1 The ERCoP facilitates information sharing between the OWF and HMCG.	The Applicant notes this clarification.
REP1-068.18	1.9.3.6 Risks are defined as Broadly Acceptable, Tolerable (if ALARP), and Unacceptable or Intolerable.	The Applicant notes this typographic error and as per Table 1.34 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098), hazards were scored against each of these three levels. This has been included in the updated Errata document submitted at Deadline 2 (S_PD1_1 F03)
REP1-068.19	1.5.4.1 Coastguard Operations Centres (CGOC) have been replaced by Maritime Rescue Coordination Centres (MRCC).	The Applicant notes this clarification. This has been included in the updated Errata document submitted at Deadline 2 (S_PD1_1 F03).

Reference	Written Representation Comment	Applicant's response
REP1-068.20	9. Cumulative impacts We welcome the further work by the project in regard to the Cumulative Regional Navigation Risk Assessment (CRNRA). MCA concerns raised in response to the PEIR dated 31 May 2023 regarding the cumulative impacts of the neighbouring Morecambe and Morgan windfarms have been addressed by the boundary changes as referred to in 1.10.1.7. We are content that these changes have resulted in the unacceptable safety risks identified in the section 42 response being reduced to 'Medium Risk – Tolerable if ALARP', as stated in 1.11.1.19.	The Applicant notes this response and confirms that the findings of the cumulative assessment on navigational safety were agreed with the MCA as part of the initial SoCG submitted at Deadline 1 (REP1-029).
REP1-068.21	There remains a concern that the in-combination effects of the Mona, Morgan, Morecambe and Mooir Vannin offshore wind farms will have significant impacts to ferry operations in the Irish Sea. Whilst this is more of a commercial issue MCA is an agency of the Department for Transport and we are concerned with the economic impacts on the nationally and internationally important ferry routes in the Irish Sea and whether these services will remain commercially viable with the necessary deviations.	The Applicant notes this response and confirms that the findings of the cumulative assessment on impacts to commercial operators (including ferries) were agreed with the MCA as part of the initial SoCG submitted at Deadline 1 (REP1-029). Impacts on Stena Line and Isle of Man Steam Packet Company in both typical and adverse weather conditions were highlighted within Volume 2, Chapter 7: Shipping and navigation (APP-059). as moderate (adverse) and thus significant within the EIA. The Applicant is engaging with the affected operators on the residual impacts and will continue to do so through the Examination phase of the Mona Offshore Wind Project.
REP1-068.22	C1 Draft Development Consent Order (F02) (PDA-003) MCA contact details in Schedule 14 should be amended to: Maritime and Coastguard Agency UK Technical Services Navigation Spring Place 105 Commercial Road Southampton SO15 1EG Email: navigationsafety@mcga.gov.uk	The Applicant notes this response and has made this update in the dDCO submitted at Deadline 2 (C1 Draft Development Consent Order F04).
REP1-068.23	Schedule 14, Part 2: Condition 13(12) – we request the condition is more specific to buried cables and reworded as follows (as per our PEIR response): "In case of buried cables becoming exposed on or above the seabed, the undertaker must within three days…"	The Applicant notes this response and has made this update in the dDCO submitted at Deadline 2 (C1 Draft Development Consent Order F04).

Reference	Written Representation Comment	Applicant's response
REP1-068.24	Condition 18(a)(ii) allows for up to 125m turbine or platform micrositing which is a significant increase from the standard 50m. Such an increase has not been discussed and is a concern to MCA as there are potential impacts on SAR access and operations.	Whilst it is necessary to have the provision to microsite the turbines to account for unknown ground conditions that could not be identified through survey, the likelihood of needing to microsite post-approval of the design plan is anticipated to be low as detailed ground investigation work will have fed into the final design plan. It should be noted that the 125 m figure represents the maximum extent of micrositing, and it is likely that where micrositing is required, it would be at much smaller distances. Moreover, the likelihood of two adjacent infrastructure locations both requiring micrositing is low. Additionally, the likelihood of the two adjacent locations requiring micrositing towards one another, is even lower. However, were micrositing to be needed, then with 1,400 m minimum spacing and a highly unlikely worst case maximum micrositing scenario of two adjacent infrastructure locations needing to each move 125 m closer to one another, there would still be at least 1,150 m between them, exceeding the requirements of MGN654 Annex 5 and still facilitating safe Search and Rescue access. The Applicant will engage with MCA on this issue through ongoing discussions on the Statement of Common Ground.
REP1-068.25	The comments detailed above are to highlight areas of concern, and items to be addressed by the applicant in consultation with the MCA and navigation stakeholders to ensure the risk to the safety of navigation and the impact on SAR capability remains low.	The Applicant notes this response.

2.7 Microsoft

Table 2.7: REP1-069 - Microsoft

Reference	Written Representation Comment	Applicant's response
REP1-069.1	This Written Representation is submitted on behalf of Microsoft Ireland Operations Limited ('Microsoft') in pursuance of Rule 10(1) of the Infrastructure Planning (Examination Procedure) Rules 2010 in relation to an application by Mona Offshore Wind Limited (the 'Applicant') to the Secretary of State under the Planning Act 2008 for a Development Consent Order for the construction and operation of an offshore windfarm located in the east Irish sea, including offshore elements (the 'Proposed Development'). The building and maintenance of submarine telecommunications cables are a significant part of Microsoft's efforts to enhance global connectivity and support the increasing demand for cloud services and data transmission. As public and private sectors deepen their reliance on cloud technologies for economic growth and service improvement, new cable projects will advance both resiliency and capacity for customers using Microsoft's cloud services.	The Applicant notes Microsoft's response.
REP1-069.2	Microsoft is planning a submarine telecommunications cable linking Wales and Ireland in the same area as the Proposed Development. Microsoft's proposed cable route will cross the Proposed Development's export cables and will land nearby in Abergele (see Appendix 1 showing the overlap between the Proposed Development and Microsoft's proposed route for the submarine telecommunications cable).	The Applicant notes Microsoft's response and the location of Microsoft's proposed cable route.
REP1-069.3	Microsoft does not object to the principle of the Proposed Development, but requests that the Applicant ensures that the views and concerns of its proposed project are considered when constructing the Proposed Development's export cables. Microsoft therefore requests a commitment from the Applicant to enter into reasonable negotiations on a	As set out in Table 10.16 of Volume 2, Chapter 10: Other sea users (APP-062), where the Mona Offshore Wind Project cables either cross or are in proximity to active cables, crossing and proximity agreements will be established with the relevant cable operators. These will be finalised post-consent, prior to commencement of construction in line with standard industry practice. The

Reference	Written Representation Comment	Applicant's response
	crossing agreement, based on established industry norms, and to coordinate activities (if required) at the relevant stage of the project. Should Microsoft and the Applicant work together, both projects can successfully complete with minimum impacts. Microsoft currently reserves the right to make further written representations in relation to the offshore elements of the Proposed Development.	Applicant would therefore welcome engagement with Microsoft on their proposed telecommunications cable.

2.8 North Wales Wildlife Trust

Table 2.8: REP1-071 – North Wales Wildlife Trust

Reference	Written Representation Comment	Applicant's response
REP1-071.1	This is a summary of Mona Offshore Wind Farm Examination Library Written Submission PDA-050, from Wildlife Trust Wales (WTW) on behalf of The North Wales Wildlife Trusts (NWWT). TWT are a movement of 46 independent Wildlife Trusts (including NWWT) covering the UK, the Isle of Man and Alderney, and are the largest UK voluntary organisation dedicated to conserving all the UK's habitats and species, whether in the countryside, towns or at sea. We improve places for wildlife and strengthen the relationship between people and the natural environment. Our aim is to protect and create resilient ecosystems on land and in the sea. 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, but, this industrialisation of the seascape has 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. Marine net gain should be proportional to the size and impact of the individual project, but ensure that the measures are mutually inclusive of other project restoration deliverables.	The Applicant notes NWWT's response.
REP1-071.2	Mona Array Area The Mona Array represents ~450km2 area of potential benthic change by the introduction of OWF infrastructure creating hard substrate in a predominantly soft sediment environment. This will change the benthic biotope and introduce a bottom up pressure. This represents a shifting baseline, and the cumulative effect that Mona and other OWF projects in this area exert needs to be thoroughly understood.	As set out in section 4.11.2 of Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-016), the Mona Array Area was reduced from approximately 450 km^2 to 300 km^2 in response to stakeholder feedback on the Preliminary Environmental Information Report (PEIR). The Applicant has assessed the impact of the introduction of artificial structures on benthic subtidal habitats in the project alone assessment and cumulative assessment in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) (see section 2.9.6 and section 2.11.5, respectively). This assessment has drawn upon the latest published studies and research. The assessment considers the complexities of this impact, addressing both the potential impacts of the introduction of infrastructure on biodiversity and also the potential for adverse effects on the wider soft sediment

Reference	Written Representation Comment	Applicant's response
		environment. The Applicant is confident that the effects associated with this impact pathway will be no greater than minor adverse significance and are therefore not significant in EIA terms.
REP1-071.3	Export Cable Corridor and Cabling WTW advocate 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 apportion of risk. 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. The selected route passes through designations and makes landfall in the vicinity of a SSSI. HDD will be used to bring the cable ashore but concerns regarding impact on sensitive reef and soft sediment features remain.	The Applicant has considered all designated sites, protected features and sensitive habitat which the Mona Offshore Wind Project interacts with along the Offshore Cable Corridor. The Mona Offshore Cable Corridor passes through the Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC. The effect of the Mona Offshore Wind Project on this SAC has been assessed throughout Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) and HRA Stage 2 ISAA Part Two: Special Areas of Conservation (SACs) Assessments (APP-032) in relation to all relevant impacts including temporary habitat disturbance and long term habitat loss. The assessment of potential impacts to features of the Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) identified no significant adverse impacts. The assessment of potential impacts to features of the Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC in the HRA Stage 2 ISAA Part Two: Special Areas of Conservation (SACs) Assessments (APP-032) concluded beyond reasonable scientific doubt that there is no risk of an adverse effect on the integrity of the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC. Additionally, an assessment of the impacts of the Mona Offshore Wind Project on benthic intertidal receptors was also included in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054). The Mitigation and monitoring schedule (PDA-019) and the Ouline landfall construction method statement (APP-226) make a commitment for trenchless techniques to be undertaken under the intertidal area from seaward of mean low water springs, where the exit pits will be located, to onshore to ensure that direct impacts (e.g. habitat loss or disturbance) to the ecologically sensitive and nationally protected clay with piddocks important ecological feature as well as other intertidal habitats will not occur. As outlined in Table 2.19 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) there is also a commitment to a 50 m exclusion buffer to avoid the *Sabellaria alveolata* reef and *Mytilus edulis* bed at the landfall. This commitment will be included in the offshore construction method statement and is expected to be secured in the standalone marine licence. The potential for indirect effects on intertidal receptors (e.g. from increases in suspended sediment concentrations and sediment deposition and changes in physical processes) has been assessed in sections 2.9.3 and 2.9.9 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054). The assessments of intertidal receptors in Volume 2, Chapter

Reference	Written Representation Comment	Applicant's response
		2: Benthic subtidal and intertidal ecology (APP-054) identified no significant adverse impacts. As outlined in Volume 3, Chapter 3: Onshore Ecology (APP-066), effects on Traeth Pensarn SSSI have been avoided through modifying the Order limits to avoid the coastal vegetated shingle of the SSSI. Some areas of the SSSI are still included in the Order limits to allow for access to Work No. 3 (see works plans – onshore AS-003) but the coastal vegetated shingle (the designated feature of the SSSI) will not be impacted.
REP1-071.4	Underwater noise The project has opted for suction bucket jacket foundations but retained the right to pile. The piling strategy if required should be sequential, adopting at least soft start protocols as mitigation. Determination of TTS and PTS should be made relative to the most acoustically sensitive species in the ZoI. A baseline assessment of underwater noise must be undertaken in order to properly determine the projects noise impact including the use of ADD, construction noise, and that from increased shipping. Prior to the determination of an underwater noise standard the project must employ the precautionary principle with respect to receptor impact.	The Applicant retains the flexibility to construct foundations using any one or more of the following options: a multi-leg pin piled jacket, multi-leg suction bucket jacket, or gravity base foundation as set out in the Environmental Statement - Volume 1, Chapter 3: Project Description (APP-050). For fish and shellfish (Volume 2, Chapter 3: Fish and shellfish ecology (APP-055)) the Applicant confirms they have considered the use of suction bucket jacket foundations in relation to long term habitat loss for fish and shellfish receptors, but the maximum design scenario (MDS) for the impact of underwater sound on fish and shellfish and marine mammals is based on installation of foundations by piling. The Applicant has included soft start and ramp up in measures adopted as part of the Mona Offshore Wind Project, as detailed in Table 4.17 of Volume 2, Chapter 4: Marine mammals (APP-056). These measures will be included within the final Marine Mammal Mitigation Protocol (MMMP) as secured under Schedule 14, Condition 18(1)(h) within the draft Development Consent Order (DCO) (C1 Draft Development Consent Order F04) and expected to be secured within the standalone marine licence. The final MMMP will be developed post-consent in accordance with the outline MMMP (APP-207) in consultation with the licencing authority and Joint Nature Conservation Committee (JNCC). The Applicant confirms PTS and disturbance from piling is presented in Volume 2, Chapter 4: Marine mammals (APP-056) for each species, with the mitigation zone in the Outline MMMP (APP-207) to reduce the risk of injury to marine mammals based upon the most sensitive species. Similarly, for fish and shellfish receptors, the assessment of impact has been made based on the most sensitive species (see Volume 2, Chapter 3: Fish and shellfish ecology (APP-055)). The thresholds used in the assessment of effects of elevated underwater sound on marine mammals (in Volume 2, Chapter 4: Marine mammals (APP-056)) and fish (in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055)) are based on

Reference	Written Representation Comment	Applicant's response
		absolute sound level thresholds or dose response relationships which do not consider the baseline noise level. Therefore, the Applicant highlights that even if a baseline underwater sound survey had been undertaken it would not be used in the assessment in accordance with Popper *et al*. (2014) and Southall *et al* (2019) and the other scientific studies used in APP-055 and APP-056. Impacts such as underwater sound from piling, UXO, vessels and geophysical/geotechnical surveys have been included in Volume 2, Chapter 4: Marine mammals (APP-056), with impacts scoped in (detailed in Table 4.6 of APP-056) and out (Table 4.7) as agreed with stakeholders via the Scoping Opinion (APP-194). Whilst ADDs were not assessed as a separate impact, as per the detailed response to RR-011.28 in the Applicant's Response to Relevant Representations (PDA-008), the Applicant maintains that the assessment is precautionary, and conclusions of significance are valid with respect to disturbance from Acoustic Deterrent Devices (ADDs). NRW (A) has also agreed in their written representation (REP1-056, paragraph 168) that the use of ADDs does not require a separate impact assessment given that proportionate ADD use will be considered post consent, through the final MMMP (in accordance with the Outline MMMP (APP-207)) which will be developed in consultation with the licensing authority and JNCC. The Applicant has applied the precautionary principle throughout the marine mammal (and other receptors) impact assessment. For example, the MDS for marine mammals is developed based on consideration of the Project design envelope (see Volume 1, Chapter 3: Project Description (APP-050)), with the final MDS representing the 'worst case' but realistic scenario for marine mammal receptors. In addition, precaution has been built into the assessment as detailed in paragraph 4.9.2.37 in Volume 2, Chapter 4: Marine mammals (APP-056). For example, there are conservative assumptions in the marine mammal baseline for marine mammal receptors (e.g. use of seasonal density peaks for harbour porpoise and grey seal, offshore and inshore densities for pinniped species) and conservative assumptions in the underwater sound modelling (see summary in paragraph 4.9.2.39 in Volume 2, Chapter 4: Marine mammals (APP-056) and Underwater sound technical report (APP-079)).

2.9 Ørsted IPs

Table 2.9 - REP1-072 – Ørsted IPs

Reference	Written Representation Comment	Applicant's response
REP1-072.1	Wildlife Impacts 1.5 As flagged during ISH2, given the increasingly complex nature of the existing and proposed development environment in the East Irish Sea, the Ørsted IPs have an interest in ensuring the EIA for the Project accurately assesses the potential effects of the Project on wildlife and identifies appropriate mitigation. This is the case both in respect of the effects of the Project alone and cumulatively/in-combination with other relevant projects. 1.6 The Ørsted IPs have reviewed the Project documentation in order to understand the basis on which the Applicant has reached its conclusions regarding the effects of the Project on wildlife. 1.7 As a general point, the Ørsted IPs have identified some discrepancies in the Applicant's assessments and consider that in some cases it is unclear how the Applicant has reached its conclusions. For example, the Applicant's assessment of the Project's cumulative impacts on ornithology has not included available data on some cumulative impacts, such as quantitative displacement data for the Ormonde, Robin Rigg and West of Duddon Sands developments in relation to gannet. Additionally, in some cases, outdated population data has been relied on in the Applicant's HRA assessment of effects on Special Protected Areas, which has resulted in those features being excluded from in-combination assessment.1	The Applicant notes Ørsted IPs' comments. The Applicant has updated several of the offshore ornithology application documents (tracked and clean versions) at Deadline 2 to address errata identified in the Errata Sheet (REP1-044) submitted at Deadline 1 and any further discrepancies considered to be errata identified in Natural Resources Wales (NRW's) and the Joint Nature Conservation Committee's Written Representations (REP1-056; REP1-066/REP1-067, respectively). A full list of updated documents can be found in the Applicant's Response to the Examining Authority's Rule 17 Letter (S_D2_2). In addition, the Applicant has undertaken a 'gap-filling' exercise in accordance with SNCBs advice (which is presented in Section D.6.13 of Appendix D of Technical Engagement Plan APP-042) to generate indicative estimates for currently unquantified impacts from historical projects. This information is intended to further facilitate the SNCB's understanding of the total quantitative cumulative and in-combination impact for offshore ornithology. The Applicant is currently engaging with the statutory nature conservation bodies on the results of the gap-filling exercise for the Mona Offshore Wind Project and anticipates being able to submit information with respect to this for examination at Deadline 3. Further information regarding this exercise can also be found in Applicant's Response to the Planning Inspectorates Rule 17 letter (S_D2_2). The Applicant confirms that the latest population data at the time of the application from the Seabird Monitoring Programme (SMP) online database has been used within the HRA (see HRA Stage 1 Screening Report (E1.4 F02) for full details).
REP1-072.2	1.8 The approach to apportionment in the HRA ornithology SPA assessment also lacks clarity in places. For example, impacts on several species have been apportioned to sites where that species is not a designated feature or known to breed. A significant proportion of impacts for guillemot, razorbill, kittiwake, herring gull and great black-backed gull	The Applicant considers that the information presented in Volume 6, Annex 5.5: Offshore Ornithology Apportioning Technical Report (APP-095) has been misinterpreted by the Orsted IPs. Volume 6, Annex 5.5: Offshore Ornithology Apportioning Technical Report (APP-095) presented colonies that are geographically located within a designated site (included SPA, SSSI or MNR), but it does not specifically infer that species is a qualifying feature of that site.

Reference	Written Representation Comment	Applicant's response
	have been apportioned to the Anglesey Terns SPA, for instance, despite these species not being designated features of that site.	Therefore, northern gannet breeding on Middle Mouse off Anglesey's north coast are included in "Anglesey Terns SPA".
REP1-072.3	1.9 We also consider the Applicant has strayed from established methodology for some aspects of its HRA. For example, collision risk with vessels for marine mammals has been screened-out for further assessment on the basis of factored-in mitigation measures. However, factored-in measures should not be taken into account at stage 1 screening.	The Applicant notes the Orsted IPs' comment and highlights that the HRA Stage 1 Screening Report (APP-034) has not screened out collision with vessels for marine mammals solely on the basis of mitigation measures. Whilst the Applicant acknowledges the offshore environment management plan is discussed in the HRA Stage 1 Screening Report (APP-034), it states in paragraph 1.4.5.23 of the HRA Stage 1 Screening Report (APP-034) that 'These plans have not however, been considered in the determination of no LSE, but they will nevertheless reduce the likelihood of a collision event occurring'. Instead, as discussed in paragraph 1.4.5.19 to 1.4.5.21 of the HRA Stage 1 Screening Report (APP-034), movement of vessels, numbers and types of vessels, and distance to Special Areas of Conservation (SACs) designated for Annex II marine mammals are all considered in screening of LSEs. The Applicant highlights that in Table 1.11 of the Statement of Common Ground - Natural Resources Wales Advisory Offshore (REP1-025), NRW confirmed agreement to the approach for LSE Screening of impacts and the assessment methodology for marine mammals (see NRW.HRA.22 and 23 in Table 1.1).
REP1-072.4	1.10 Additionally, the Applicant's stage 2 Appropriate Assessment of ornithological features incorporates an additional screening process, whereby sites are screened out based on: 1.10.1 the mortality risk to the species based on the project alone, with in-combination only being considered if the Project will have an impact greater than a 0.05% change in mortality; and 1.10.2 potential impacts on conservation objectives for the designated sites being considered only where the impacts (alone or in-combination) will result in a greater than 1% change in baseline mortality of a species that is a qualifying feature of the site.	The Applicant can confirm that the approach presented for the Mona Offshore Wind Project has been discussed via the expert working group (EWG) (section A.7.3 of the Technical Engagement Plan Appendices - Part 1 (A to E) (APP-042)) and confirmed as acceptable by Natural Resources Wales and Natural England (section D.9 of the Technical Engagement Plan Appendices - Part 1 (A to E) (APP-042)). This agreement is recorded in rows NRW.HRA.31 and NRW.HRA.32 of the Mona and Natural Resource Wales (advisory) Offshore Statement of Common Ground (APP-025).
REP1-072.5	1.11 Consideration of conservation objectives is a required process within HRA Stage 2 assessment. The Applicant's approach has resulted in impacts such as barrier effects not being considered, despite these being relevant considerations for the conservation objectives of many	The Applicant can confirm that the approach presented for the Mona Offshore Wind Project has been discussed via the EWG (section A.7.3 of the Technical Engagement Plan Appendices - Part 1 (A to E) (APP-042)) and confirmed as

Reference	Written Representation Comment	Applicant's response
	qualifying interests outside of solely impacts based on changes in mortality as part of the displacement assessment.	acceptable by NRW and Natural England (section D.9 of the Technical Engagement Plan Appendices - Part 1 (A to E) (APP-042)).
REP1-072.6	1.12 Finally, we consider the basis of the Applicant's baseline assessment of impacts on marine mammals is unclear. No baseline information is provided that specifies the marine mammal population densities of qualifying interests within the Project's Zone of Influence (ZoI). The Applicant has referenced technical reporting which discusses site-specific surveys, however this information does not appear to have been used in establishing the baseline for the ZoI and the rationale for this is not clear. 1.13 The issues flagged above raise concerns about the adequacy of the Applicant's environmental assessment and also aspects of the HRA.	The Applicant notes the Orsted IPs' comment but disagrees that there is inadequate baseline information for marine mammals within the potential Zone of Influence for impacts associated with the Mona Offshore Wind Project. Paragraph 1.7.2.1 in the Part Two: Special Areas of Conservation (SACs) Assessments (APP-032) clearly states 'baseline information on the Annex II marine mammal features of the European sites identified for further assessment within the HRA process has been gathered through a comprehensive desktop study of existing studies and datasets, using the latest available information on marine mammals in the Irish Sea. The baseline is informed by the 24-month site-specific aerial survey data and baseline characterisation presented in Volume 6, Annex 4.1: Marine mammal technical report (APP-090) and Volume 2, Chapter 4: Marine mammals (APP-056)'. Volume 2, Chapter 4: Marine mammals (APP-056) provides the densities that are used in the impact assessment (derived from the Welsh Marine Mammal Atlas, SCANS-III and Carter *et al*. 2022), which have all been agreed with stakeholders through the Expert Working Group Process (as detailed in paragraph 4.5.3.1 and Table 4.5 and Table 4.12 of Volume 2, Chapter 4: Marine mammals (APP-056)). For further consultation information, the Applicant directs the Orsted IPs to the Technical Engagement Plan (APP-041) and minutes of the Expert Working Group (EWG) meetings in Appendix C of the Technical Engagement Plan (Appendices Part 1 (A to E) (APP-042)). Furthermore, in the Mona and Natural Resources Wales (Advisory) Statement of Common Ground (SoCG) (REP1-025), NRW has agreed with the data collected through surveys and literature including the data sources used to characterise the baseline and the Joint Nature Conservation Committee (JNCC) has also agreed that digital aerial surveys (DAS) should not be the primary data source for marine mammal characterisation and agreed the baseline was to be supplemented with other data sources (see the Mona and JNCC SoCG (REP1-028)). The Applicant considers it would be unnecessarily exhaustive to repeat this information in the HRA documentation (APP-031 to APP-034) and considers the reference to Volume 6, Annex 4.1: Marine mammal technical report (APP-090) and Volume 2, Chapter 4: Marine mammals (APP-056) adequate. Within Part Two: Special Areas of Conservation (SACs) Assessments (APP-032) the marine mammal densities used are clear (e.g. paragraph 1.7.3.30 states 'This is a conservative estimate using a single density derived for the Mona Array Area from

Reference	Written Representation Comment	Applicant's response
		the Welsh Marine Mammal Atlas (Evans and Waggitt, 2023) across the Irish Sea and assumes a uniform distribution throughout the area.'). The Applicant further highlights that in Table 1.11 in the Mona and NRW SoCG (REP1-025), NRW confirmed they agreed with the assessment methodology (NRW.HRA. 23 to 27) and with the overall conclusions of the ISAA for both the Mona Offshore Wind Project alone and for the project in-combination with other projects and plans (NRW.HRA. 28 to 29). Therefore, the Applicant considers both the environmental assessment and the HRA documentation to be robust, precautionary and reflective of the matters agreed via the EWG process with stakeholders.
REP1-072.7	Shipping and navigation 1.14 The Ørsted IPs have concerns regarding the Applicant's assessment of the impacts of the Project on shipping and navigation. In particular, the Ørsted IPs are concerned as to how the cumulative risks to shipping and navigation could be managed, in light of the level of development in this area, and the uncertainty regarding the location of construction and operation/maintenance operations. The Ørsted IPs consider some level of coordination will be required between developers and other sea users in the area.	A comprehensive Navigation Risk Assessment has been undertaken for the Mona Offshore Wind Project to identify, assess and ensure appropriate mitigation is in place to reduce navigation risks caused by the Mona Offshore Wind Project to As Low As Reasonably Practicable, as presented in Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). Consensus has been reached with stakeholders that this has been achieved and is reflected within the initial SoCG submitted by MCA at Deadline 1 (REP1-029). It should be noted that none of the Ørsted IPs are within 10 nm of the Mona Array Area and the level of direct impact is correspondingly limited. Operational and navigational safety impacts caused by the movements of vessels between the Mona Array Area and construction and operations and maintenance ports have been assessed as part of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). Firstly, the movement of Mona Offshore Wind Project construction vessels crossing adjacent shipping routes around the Mona Array Area which poses a potential risk of collision has been considered. The Maximum Design Scenario (MDS) for shipping and navigation considered up to 2,055 construction vessel movements per year with up to 86 construction vessels on site at any one time. Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) considered vessel traffic associated with existing operational wind farms by including as part of the baseline against which risks were assessed. Having identified that the highest traffic density was located to the south of the Mona Array Area, it was assumed within Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) that the greatest impact from construction vessels would be from a construction, and operations and maintenance base located on the north Wales or northwest England coast, requiring Mona Offshore Wind Project vessels to cross the shipping routes and encounter the greatest volume of third party traffic. Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098), which included a Cumulative Regional NRA, identified several relevant hazards in consultation and

Reference	Written Representation Comment	Applicant's response
		agreement with stakeholders and considered the likelihood and consequence of project vessels colliding with passing vessels, concluding that such risks were Medium Risk – Tolerable (if as low as reasonably practicable (ALARP)) or Broadly Acceptable. This assessment was based on a review of the Project Description, navigation simulations undertaken with key stakeholders and was assessed within the Hazard Workshops undertaken to support the Environmental Statement where a consensus was reached that all risks were reduced to Medium Risk – Tolerable (if ALARP). Secondly, an assessment was undertaken within Volume 2, Chapter 7: Shipping and navigation (APP-059) of other impacts to ports and harbours, such as congestion. This was undertaken following a review of the possible impacts encountered on previous offshore wind projects in the UK and how these have been successfully managed with existing risk controls, particularly through marine coordination of construction activities and liaison with ports and harbours. The deemed Marine Licence (dML) within the draft DCO (C1 draft Development Consent Order F04) secures the development post-consent and approval by the licencing authority in consultation with the MCA and Trinity House of a Vessel Traffic Management Plan (in accordance with the Outline Vessel Traffic Management Plan (APP-200)) to ensure navigational safety and minimise impact on other marine users during the construction phase of the Mona Offshore Wind Project. At this stage no decision has been made regarding which port or ports will be used for the construction of the Mona Offshore Wind Project.
REP1-072.8	1.15 In line with technical advice the Ørsted IPs have received on this issue, we seek that the Applicant provide ongoing updates regarding its consultation with vessel operators including any likely future case routeing which may impact the Ørsted IPs' developments, as well as engagement on any mitigations which could influence the Ørsted IPs' developments (including any positive measures). In addition, the Ørsted IPs seek that a mechanism is developed to ensure they are consulted in respect of any operational procedures for the Project, relating to construction and operation traffic to/from the Ørsted IPs developments.	The Applicant welcomes ongoing engagement to ensure navigational safety is maintained in the eastern Irish Sea and has committed within Volume 2, Chapter 7: Shipping and navigation (APP-059) to continue engagement with all stakeholders through the Marine Navigation Engagement Forum (MNEF) which, as the Orsted IPs will be aware, includes offshore wind energy developers.

Reference	Written Representation Comment	Applicant's response
REP1-072.9	Energy Yield 1.16 Due to the proximity of the Project to the Ørsted IPs' developments, the Ørsted IPs are concerned the Project will interfere with the wind speed and/or direction at their developments and therefore adversely affect energy yields. 1.17 The Applicant has treated the potential impacts of the Project on wake loss purely in terms of economic loss in the EIA, and as the panel will know, to have significant economic effects in EIA terms requires very extensive effects. That is the nature of economic evaluation in this context. The live issue is that the wake losses would be a real impact on an existing sea user and should be balanced in terms of the proposed benefits of the Project. The Applicant through design should have to minimise such effects. Such an approach requires an evaluation of the potential impacts. 1.18 Internal modelling undertaken by the Ørsted IPs indicates that the Project will have an impact on energy yield at their developments. In order to properly understand the effects of a development, the specific environment and relevant developments should be carefully considered. This issue is not only important in terms of impacts experienced by other sea users but is a matter of good design. It is also relevant to the degree of climate change benefit the Project offers. 1.19 We submit that the Applicant must model and assess the effects of the Project on other developments in the East Irish Sea, and if required, provide suitable mitigation. If the Applicant declines to undertake this assessment, the Ørsted IPs will commission it. The inclusion of a requirement like that implemented in the Awel y Mor Development Consent Order, which required that no wind turbine generator could erected "…until an assessment of any wake effects and subsequent design provisions to mitigate any such identified effects as far as possible has been submitted to and	The Applicant has considered the existing projects that comprise the Osted IPs within Volume 2, Chapter 10: Other sea users of the Environmental Statement (APP-062) as part of the baseline (section 10.5.2.9–14) in this chapter. The Applicant noted in response to the Orsted IPs Relevant Representations (PDA-008) that following the statutory pre-application consultation, as described in section 4.11.2 and Table 4.23 of Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (APP-051), the Mona array area was reduced. This increased the distance from the nearest existing operational wind farm by an additional 4.0 km, and also increased the distance from a number of other operational wind farms, thereby reducing the potential for wake effects. The distance between the Mona array area and the Orsted IPs projects (at the closest points) is between 30.6 km and 43.3 km, significantly greater than the 7.5 km siting buffer requirements in the Crown Estate's Round 4 Information Memorandum. Given the distance between the projects, and considering the recent study commissioned by TCE indicated that, for the non-site-specific scenarios modelled, potential wake effects level off with approximately 10 km separation between offshore wind farms, and for separations much larger than 20 km wake effects become vanishingly small (Frazer-Nash Consultancy Limited, 2023), the Applicant considers there is no basis on which to undertake a detailed wake loss assessment. The Applicant is also of the view that, given the distance between the projects as set out above, there is also no basis for a requirement in the Development Consent Order to mitigate wake loss effects.

Reference	Written Representation Comment	Applicant's response
	approved in writing by the Secretary of State…"2 may be suitable.	

2.10 Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW)

Table 2.10: REP1-073 - The Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW)

Reference	Written Representation Comment	Applicant's response
REP1-073.1	I am the maritime archaeologist at the Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW), who are a statutory consultee for marine licensing within Wales. As such, we have recently commented on the PINS consultation for the Mona Offshore windfarm - RR-070 within the Examination Library https://infrastructure.planninginspectorate.gov.uk/projects/wales/mona-offshore-windfarm/?ipcsection=relreps&relrep=64905 At that time, as noted in our comments, due to access issues, we had not had sight of the Outline Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD), document APP-204. Both of which are critical documents for the management and mitigation of risk to marine archaeological remains in the context of major marine infrastructure projects. These documents have since been supplied, and we have the following additional comments to make with regard to the WSI and PAD:	The Applicant notes that RCAHMW have confirmed they have now reviewed the Outline Offshore Written Scheme of Investigation and Protocol for Archaeological Discoveries (APP-204).
REP1-073.2	1. Para 1.2.1.9 Archaeological Curators. Alongside Cadw, RCAHMW is an archaeological curator for the inshore/offshore zone of the Welsh National Marine Plan because our remit extends to the outer limit of the marine plan area. We are also the only organisation within Wales with marine archaeological expertise. So just adding our initials to that paragraph to be consistent with Table 1.1 would be helpful.	The Applicant confirms that the Outline Offshore Written Scheme of Investigation and Protocol for Archaeological Discoveries has been updated and submitted at Deadline 2 (J18 F02) to refer to RCAHMW as an archaeological curator at paragraphs 1.2.1.9, 1.2.1.11 and Table 1.1.
REP1-073.3	2. Section 1.8.5 Archiving. The RCAHMW maintains the National Archive within Wales, and so any archaeologically related project material that requires archiving as setout in the WSI can come to us, from where it will also get associated with the relevant sites within the National Monuments Record. We are the MEDIN DAC for heritage purposes within Wales (para 1.8.5.3) and so archiving with us fulfills any MEDIN obligations.	The Applicant confirms that the Outline Offshore Written Scheme of Investigation and Protocol for Archaeological Discoveries has been updated and submitted at Deadline 2 (J18 F02) with reference to RCAHMW's role as Marine Environment Data and Information Network (MEDIN) Data Archive Centre (DAC) within Wales and curator of the National Archive within Wales at paragraphs 1.8.5.2 and 1.8.5.4.

2.11 Scottish Fishermen's Federation (SFF)

Table 2.11: REP1-075 - Scottish Fishermen's Federation

Reference	Written Representation Comment	Applicant's response
REP1-075.1	This response to the application is presented by the Scottish Fishermen's Federation on behalf of the 450 plus fishing vessels in membership of its constituent associations, the Anglo Scottish Fishermen's Association, Fife Fishermen's Association. Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association. Summary The Queen scallop fishery is the most important fishery alongside other fisheries such as pelagic within the Mona array and supports many shoreside employment as well as offshore. If these fisheries cease to exist for whatever reason the impact on the local infrastructure and the coastal communities which this fishery supports would be devastating. This would also highlight serious misgivings in marine spatial planning, the Mona array should never have been given an agreement for lease, from a safety, navigational and socio-economic perspective. The SFF fully recognise the need for renewable energy to tackle climate change, energy security, and to reduce consumer bills, however this should be achieved in a balanced manner. Certain arrays should never have been considered, Mona array being one of them, therefore for the following reasons highlighted within the written response the SFF strongly objects to the application.	The Applicant notes the response and acknowledges the extent and distribution of queen and king scallop fishing activity within the vicinity of the Mona Array Area. The Applicant also notes the importance of this area not only to commercial fishing vessels but also associated onshore processing activities. The Applicant recognises the importance of queen scallop landings to West Coast Sea Products Ltd and has engaged with the company since 2021 to establish the special extent of nomadic fleet. Spatial distribution of fishing activity using VMS data, supported by feedback from project-specific consultation, highlighted that the central and west part of the Mona Array Area is an important queen and king scallop fishing ground for vessels utilising dredges (as presented in section 1.4.8.5 of Volume 6, Annex 5.6: Commercial Fisheries Technical Report (APP-097)). It is evident that dredge activity and intensity varies by year, which also corroborates with information from fisheries stakeholders, which suggest that the fishery is cyclical over seven-to-eight-year periods. The Applicant contests that "*there is nowhere else that these species (Queen Scallops) can be caught round the UK coastline*" but does recognise that there are a limited number of areas around the UK coastline where it is permitted to catch queen scallops using a dredge. For example, we note there is also an established fishery for queen scallops off the north coast of Northern Ireland (Marine Scotland, 2017) The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as possible. Early engagement was established with fisheries stakeholders in June 2021 to understand stakeholder requirements for co-existence as summarised in Table 6.5 of Volume 2, Chapter 6: Commercial fisheries (APP-058) and detailed in Appendix H of the Technical Engagement Plan Appendices - Part 2 (F to M) (APP-042). Engagement will continue throughout the lifetime of the project. A Fisheries Liaison and Co-existence Plan (FLCP) will be developed by the Applicant through ongoing consultation with fisheries stakeholders, which will be based on the Outline FLCP (APP-199) submitted as part of the Application and secured through the deemed marine licence (Condition 18 in Schedule 14 of the draft Development Consent Order (DCO) (C1 Draft Development Consent Order F04) and is expected to be secured in the standalone marine licence. Mitigation and monitoring commitments are set out within Volume 2, Chapter 6: Commercial fisheries (APP-058) and the
REP1-075.2	West Coast Sea Products Ltd (WCSP), association members of the Scottish White Fish Producers Association (SWFPA), one of the SFF's constitute association members) have been catching and processing Queen Scallops in the eastern Irish Sea since 1971 and in addition King Scallops.	

Reference	Written Representation Comment	Applicant's response
	Furthermore, some pelagic fisheries also take place within the array area. The proposed Mona offshore windfarm array directly overlaps the most important Queen Scallop beds which WCSP and other SFF scallop vessel members rely on annually. The Mona array footprint is situated directly on top of the highest yielding Queen Scallop fishery in Europe. This fishery not only supports many local fishermen and processing employees on land in Kirkcudbright it also supports many more members of the SFF/SWFPA nomadic scallop fishing vessel. The reality is this unique fishery cannot be displaced elsewhere, there is nowhere else that these species (Queen Scallops) can be caught round the UK coastline. Globally there are 4 main Queen Scallop fisheries which supply the French and American markets (Peruvian, Argentine, Chile, Faroese & UK (Irish Sea)).	Mitigation and monitoring schedule (J10 F02). The mitigation measures are designed to enable co-existence as far as possible during all project phases. They include commitments to not close the entire development area during the construction phase, the establishment of a Scallop Mitigation Zone (SMZ) which will be free of wind turbines and offshore substation platforms (a commitment which is a 'first' for offshore wind in the United Kingdom as far as the Applicant is aware) and the orientation and spacing of infrastructure such that fishing can continue within the Mona Array Area. As a result of these measures, commercial fishing receptor groups will be able to continue fishing within parts of the Mona Array Area during construction. During the operations and maintenance phase, the measures will provide the space for continued fishing within the Mona Array Area and allow fishing vessels to transit through the area. Fishing will also be permitted within those parts of the Mona Offshore Cable Corridor where construction activities are not taking place. This will be achieved via the use of rolling advisory exclusion zones of 500 m around vessels installing export cables. This will avoid the entire Mona Offshore Cable Corridor being closed to fishing vessels during the construction phase. Additionally, the use of 500 m rolling advisory exclusion zones will apply to the installation of inter-array and interconnector cables.
REP1-075.3	Volume 2, Chapter 6: Commercial Fisheries Page 45. 6.5.2.4 The significance of the effect upon commercial fisheries is determined by correlating the magnitude of impact with the sensitivity of the receptor. The particular method employed for this assessment is presented in Table 6.12. Where a range of significance of effect is presented, the final assessment for each effect is based upon expert judgement. It is SFF understanding that the expert judgement is the consultants that compiled the commercial fisheries chapter. Presently, there is no methodology or standardisation on how the impacts and effects are calculated, therefore we dispute the findings on the basis that it is not factual and only based on assumptions. Despite efforts by the applicant and provision of the Draft Fisheries Liaison and Cooperation Plan (FLCP), we cannot support the application for the inevitable impact it will have	The SFF is correct in their comment that the significance of effect upon commercial fisheries is a two-stage process and is determined by correlating the magnitude of impact with the sensitivity of the receptor. As described in Volume 1, Chapter 5: Environmental Impact Assessment (EIA) methodology (APP-052), in cases where a range is suggested for the significance of effect (as highlighted in the SFF's comment), there remains the possibility that this may span the significance threshold (i.e. where the significance of effect is defined as "Minor or Moderate" in Table 6.12 of Volume 2, Chapter 6: Commercial fisheries (APP-058)). In such cases, the final significance is based upon the commercial fisheries expert's professional judgement as to which outcome delineates the most likely effect. Where this occurs, an explanation as to why this conclusion has been reached is provided. The Applicant disagrees with the statement that "*presently, there is no methodology or standardisation on how impacts and effects are calculated*". The impact assessment methodology is detailed in section 6.5 of Volume 2, Chapter 6: Commercial fisheries (APP-058) and has followed the methodology set out in Volume 1, Chapter 5: EIA methodology (APP-052). The EIA methodology

Reference	Written Representation Comment	Applicant's response
	on the Queen Scallop fishing and processing industry. The ES chapter defines the impact as Minor; we anticipate the effect of the development could be considerable and rate it as Major. We would therefore request the applicant, and the expert judgement expand on why they define the impact as minor?	complies with key legislation and guidance, as set out in section 5.2 of Volume 1, Chapter 5: EIA methodology (APP-052). The Applicant has assumed that the key impact of concern to the SFF and which forms the basis of their comment is 'loss or restricted access to fishing grounds', as assessed in section 6.8.2 of Volume 2, Chapter 6: Commercial fisheries (APP-058). The Applicant engaged with fishing stakeholders in Autumn 2022, post-scoping, on requirements to allow access to and continued fishing within Mona Array Area and Mona Offshore Cable Corridor. As set out under section 6.3 in Volume 2, Chapter 6: Commercial fisheries (APP-058), this engagement highlighted a preference for avoidance of infrastructure over queen scallop grounds, sufficient spacing between infrastructure to allow continued access and fishing, orientation of wind turbines against dominant towing directions, burying of cables and minimising the use of cable protection. In Winter 2022, further engagement was undertaken specifically with scallop fishing stakeholders on the potential development of a SMZ. Whilst feedback from this engagement was helpful and constructive, it was not feasible to refine initial proposals into formal mitigation measures and obtain agreement with stakeholders prior to publication of the Preliminary Environmental Information Report (PEIR). Additionally, the Applicant was keen to understand the views of stakeholders across the wider proposal through the statutory consultation on the PEIR, to determine the full suite of changes potentially required to address any concerns raised. Therefore, the assessment presented within the PEIR precautionarily did not include these potential mitigation measures, and consequently concluded a moderate adverse impact (which is significant in EIA terms) for 'loss or restricted access to fishing grounds' for the Scottish west coast scallop vessels receptor group. Following the publication of the PEIR, and in light of commercial fisheries and wider feedback on the PEIR, the Applicant met with commercial fisheries stakeholders in September 2023 to provide more specific details on the following mitigation measures, which were well received (see Appendix H.21 of the Technical Engagement Plan Appendices - Part 2 (F to M) (APP-043)): • Increased spacing from 1,000 m between rows of wind turbines and OSPs and 875 m between wind turbines and OSPs in a row to a minimum of 1,400 m within or between rows, subject to micrositing – to increase ability to travel through and fish within the wind farm array area

Reference	Written Representation Comment	Applicant's response
		• Inclusion of a SMZ over core queen scallop grounds - to reduce potential for impacts to scallop and enable continued fishing of these core grounds by vessels that currently fish in this area • Orientation of wind turbines rows in a roughly north south orientation - to allow vessels to maintain the dominant tow direction in this area • Commitment to burying cables as far as possible and minimising cable protection where burial is not possible - to reduce the potential for gear snagging risks/maintain ability to continue fishing within the order limits. These commitments have been secured in the Outline FLCP (APP-199) with the requirement for the Final FLCP (which must accord with the commitments of the Outline FLCP), secured under Condition 18 in Schedule 14 of the draft DCO (C1 Draft Development Consent Order F04) and expected to be secured in the standalone marine licence. In light of the commitments to the preceding mitigation and on the basis that fishing will be able to continue within the Mona Array Area during the operational phase, the assessment in Volume 2, Chapter 6: Commercial fisheries (APP-058) concluded a minor adverse impact (which is not significant in EIA terms) on 'loss or restricted access to fishing grounds' for the Scottish west coast scallop vessels receptor group.
REP1-075.4	Outline Fisheries Liaison and Co-Existence Plan (J10) Through consultation with the applicant, a draft FLCP has been presented to support the application. This includes a number of measures which would help to achieve the ambition of coexistence between the Queen and King Scallop fishery and the proposed Mona array. The applicant has included measures which we do support such as North-South rows of WTGS and inter array cables (IACs) with 1400m spacing. (However, the worst case could be reduced to 1250m in special circumstances). This aids fishing activities which are dictated by the tides when fishing in this area. The (SMZ) which although welcomed, is a smaller area than the SFF expected following consultation with the fishing industry and as highlighted there will be multiple IACs within the SMZ.	In response to queries from the Examining Authority during the Mona Issue Specific Hearing 1, the Applicant stated that the minimum spacing of infrastructure could be reduced to 1,275 m if at any point between submission of the design plan (see below) and commencement of construction at a given location, it is identified that micrositing is required to avoid, for example, archaeological resources not previously recorded at that location. In fact, where micrositing is required to the full allowance of 125 m at each of two adjacent locations, the minimum separation distance of 1,400 m could be reduced to 1,150 m (as clarified in the post hearing note included in paragraph 26 of the Issue Specific Hearing 1 Summaries (REP1-009). However, the likelihood of this scenario, and the need for micrositing in general, is low. At the point at which any micrositing is identified, Mona Offshore Wind Project would have been through the following steps: • Undertaken pre-construction geophysical and geotechnical surveys to finalise the design of the Mona Offshore Wind Project and array layout avoiding any newly identified constraints • Submitted a design plan to the licencing authority for approval in consultation with the Maritime Coastguard Agency and Trinty House setting out the grid
REP1-075.5	Crossings of the 4 existing telecommunication cables within the SMZ which will require rock protection which will in turn	

Reference	Written Representation Comment	Applicant's response
	reduce the SMZ further as the rock protection footprint must be avoided by scallop vessels.	coordinates for every single wind turbine generator, Offshore Substation Platform (OSP) and cable as required under Condition 18 of Schedule 14 in the draft DCO (C1 Draft Development Consent Order F04). The Applicant acknowledges the support given to commitments presented within the Outline FLCP (APP-199) and the SFF's preference for no inter array cables (or cable protection if/where required, for example at crossings with existing telecommunications cables) within the SMZ. However, the option to place cables and cable protection within the SMZ has been retained to ensure an efficient array and transmission system. The Applicant has committed to minimising cable installation within the SMZ where possible and where cable routing through the SMZ is required, aligning cables north-south over east-west as far as practically possible. This is compatible with dominant tow orientations exhibited by scallop vessels and the direction of static gear deployment within the Mona Array Area (such information was communicated via Project-specific consultation as set out in Table 6.5 of Volume 2, Chapter 6: Commercial fisheries (APP-058)).
REP1-075.6	A significant concern of the FLCP is the commitment towards cable burial between WTGs of only 0.5m minimum burial depth and the use of rock protection in areas of cable crossings (67) and where burial depth cannot be achieved. It is unknown at this stage from the survey work carried out by the applicant how successful IACs will be buried. We feel that a Cable Burial Risk Assessment (CBRA) should have been tabled prior to commitment on minimum burial depth. Carbon Trusts Guidance on Cable Burial 2015 which all CBRA are based states there should be at least 100% contingency on both anchor penetration and fishing gear whichever is the greater. We therefore suggest that this minimum burial depth must be revisited by the applicant prior to the determination.	As described within Volume 1, Chapter 3: Project Description (APP-050), all subsea cables will be buried below the seabed wherever possible and protected with a hard-protective layer (such as rock or concrete mattresses) where adequate burial is not achievable. Depending on the Cable Burial Risk Assessment (CBRA), it is expected that the offshore export cables and interconnector will be buried to a target depth of 1 m, with a maximum burial depth of 3 m and a minimum burial depth of 0.5 m. The maximum percentage of export and interconnector cable route requiring cable protection is 20%. Also depending on the CBRA, it is expected that inter-array cables will be buried to a target depth of 2 m with a maximum burial depth of 6 m and a minimum burial depth of 0.5 m. The maximum percentage of the inter-array cable route requiring cable protection is 10%. The CBRA will be undertaken post-consent and will inform cable burial depth which will be dependent on ground conditions as well as external risks. The use of cable protection beyond the limits assessed in relevant chapters of the Environmental Statement is controlled within the draft DCO (C1 Draft Development Consent Order F04) and expected to be controlled in the standalone marine licence. Within the Draft DCO, Table 4 in Schedule 14 sets a maximum limit on cable protection volume and area for inter-array and interconnector cables within the Mona Array Area. These limits are based on protection of up to 10% and 20% of total cable length being protected for inter-array cables and interconnector cables respectively. Similar limits on footprint and area of cable protection are
REP1-075.7	The WCSP fishing expertise in the array are more than aware of hard areas of ground to the west within the array who would predict that burial depth will not be achieved therefore, as a result would require rock armour protection. All applicants state within their EIAs that they would achieve 80% total burial, however, in most cases this is never the case.	

Reference	Written Representation Comment	Applicant's response
REP1-075.8	The SFF are deeply concerned that the ambitions of the FLCP do not go far enough with a shallow target burial depth. Experience from other OWFs and SFF members fishing within them such as Seagreen and Moray East we have found consistently that burial is generally unsuccessful, hence why we are extremely concerned with the proposed development.	expected to be set out in the standalone marine licence for the export cables. The Applicant will not be able to exceed these limits without variation to the deemed marine licence/standalone marine licence, which the licencing authority would likely consult on with relevant stakeholders. Additionally, Condition 27 in Schedule 14 of the draft DCO requires that the Applicant provides the licensing authority and the JNCC with a report setting out details of the cable protection and scour protection used for the authorised scheme including the volumes of scour and cable protection used.
REP1-075.9	In addition, there is evidence of cables becoming exposed (10miles southeast) at Gwynt y Mor OWF (commissioned 2015) in a near identical substrate. Extract from Notice to Mariners NtM, "a significant number of array cable exposures are still being reported. Due to the mobile nature of the seabed within the wind farm boundary these cable exposures are subject to change and may develop in areas where there were none previously"1. Should Mona be constructed, it is inevitable, following construction that a series of cable exposures will occur and could render the FLCP worthless as it would be too high a risk to operate safely within the array.	The Applicant notes that the SFF have suggested that a CBRA should already have been undertaken to inform the minimum burial depth stated within the Environmental Statement. The Applicant maintains that it is not possible to effectively carry out a CBRA which encompasses the full range of project design options which have been included in the Maximum Design Scenario (MDS). To be effective, the CBRA must be based upon final cable routes, which will be determined post-consent and is subject to the acquisition of geotechnical and geophysical data and the completion of detailed project design. As such, the burial depths stated in Volume 1, Chapter 3: Project Description (APP-050) can only be indicative at this stage. Prior to any construction activities commencing, an offshore construction method statement (CMS) which includes a cable specification and installation plan (CSIP) incorporating a CBRA will be developed and submitted to the licencing authority for approval prior to commencement of construction. Development and adherence to the offshore CMS is secured within the deemed marine licence under Condition 18 in Schedule 14 of the draft Development Consent Order (DCO) and expected to be secured within the standalone marine licence. The Applicant notes the cable exposures in the East Irish Sea and for other UK projects which have been highlighted by the SFF. The Mona Offshore Wind Project has committed to monitoring of cables and their burial status to reduce snagging risk, which will be included in the Offshore CMS. Within the Outline FLCP (APP-198) the Applicant has also committed to the use of guard vessels should cables become exposed, which will ensure navigational safety and minimise the potential risk of gear snagging posed by exposed cables until such risks have been mitigated.
REP1-075.10	An additional concern of the FLCP is the SMZ, which, based upon the WCSP providing coordinates to the applicant, the SMZ corridor as it stands is some 3.2km in width, however, is only circa 35% of what was communicated to the	The Applicant acknowledges the SFF's comment regarding the indicative size of the SMZ within the Mona Array Area (REP1-075.10) and notes that this differs from the more positive feedback received during the project design update meeting undertaken in September 2023 (Appendix H.21 of the Technical

Reference	Written Representation Comment	Applicant's response
	applicant. It is also noted that the SMZ is indicative, the SMZ could be reduced further.	Engagement Plan Appendices - Part 2 (F to M) (APP-043)). At present, the SMZ covers an approximate total of 37% of scallop grounds located within the Mona Array Area. The Applicant confirmed in Response to Hearing Action Points F01 (REP1-012) following Issue Specific Hearing 2 that the indicative SMZ presented in figure 1.3 of the Outline FLCP (APP-199) is approximately 57 km^2. The Applicant will commit to maintaining the SMZ at 57 km^2 by including this commitment within an update to Table 1.2 of the Outline FLCP (APP-199) at Deadline 3. Volume 2, Chapter 6: Commercial fisheries (APP-058) has acknowledged the significant importance of scallop fishing in the vicinity of the Mona Array Area and Offshore Cable Corridor. Enabling co-existence is a key aim underpinning the Applicant's commitments to not close the entire development area during construction, the SMZ, and the orientation and spacing of infrastructure (as set out in the Outline FLCP (APP-199)). During the construction phase, it will be possible for fishing activities to continue within those parts of the Mona Array Area where construction is not being undertaken. During the operations and maintenance phase, the measures adopted as part of the Mona Offshore Wind Project, such as the SMZ, minimum infrastructure spacing of 1,400 m and roughly north-to-south alignment of wind turbine rows (as set out in the Outline FLCP (APP-199)), will provide the space for continued fishing within the Mona Array Area and fishing vessels will also be able to transit through this area. Whilst it is noted that the SFF state that circa 30% of 2023 fishing activity for queen scallop took place in areas outside the SMZ, it is important to recognise that fishing will also be permitted in parts of the Array that do not lie within the SMZ.
REP1-075.11	Our understanding of the draft FLCP and the SMZ has been reduced because the developer chose not to utilize the eastern extents of the original lease area due to poorer wind yields. Given that there are operating windfarms to the east of Mona and should the applicant have developed to the East, the Mona array would not have encroached upon valuable fishing ground. With implementation of the FLCP this would not reduce the impact adequately therefore we anticipate the proposal to have a major effect on our operations.	
REP1-075.12	The Mona array and the export cable corridor (ECC) to the South shall be situated on circa 40% of 2023's fishing activity. In examining the SMZ detailed in the FLCP the net impact would mean that circa 30% of 2023 fishing activity for Queen Scallop fishing would fall within Mona not covered by the Scallop Mitigation Zone (SMZ).	
REP1-075.13	Other Considerations Weather The Commercial fisheries chapter and FLCP does not factor in the impact that poor weather will have on decision making by fishing vessel skippers. Experience from existing fixed foundation offshore windfarms, most skippers will only attempt to fish when the weather conditions are ideal. The Mona project area is situated on top of autumn and winter Queen and King Scallop fisheries as dictated by the seasonality of the product, i.e. fished when yields are at their peak in the autumn and winter months. As a result, fishery management measures and closed seasonal areas have been implemented, the SFF expects Mona will have a High level of magnitude for our members as presently skippers	The Applicant has assessed the potential impacts of the Mona Offshore Wind Project on navigational safety for fishing boats within Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). This included risk to vessels engaged in fishing within the Mona Array Area or along the Mona Offshore Cable Corridor, and fishing vessels on transit passing adjacent to or through the Mona Array Area and included consideration of adverse weather conditions. The risk of collision and allision with wind turbines or offshore substation platforms, as well as vessels operating within or adjacent to the Mona Array Area was identified as part of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) in hazards 3, 4, 8, 17 and 25. These were discussed during the hazard workshop undertaken in October 2024, which was attended by representatives from fishing organisations (Anglo Northern Irish Fish Producers Organisation (ANIFPO) and SWFPA) and these hazards were scored as Medium Risk –

Reference	Written Representation Comment	Applicant's response
	will fish in slightly poorish weather, however, will be hesitant to enter with the hazards imposed by a windfarm.	Tolerable if As Low As Reasonably Practicable (ALARP). Section 1.8.5 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) discusses impacts to fishing, noting issues surrounding "Spatial Squeeze" and reflected the levels of fishing activity detected as part of the vessel traffic surveys reported in Section 1.6 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). These hazards recognised that causes could include the presence of infrastructure and therefore reduced sea room, adverse weather conditions and increased vessel traffic amongst others. On the basis that crews of fishing vessels are trained, the vessels are equipped with navigational equipment and the spacing between Mona Offshore Wind Project infrastructure exceeds the spacing of other offshore wind farms in the UK, these risks were determined to be ALARP. Similar conclusions were reached within the Cumulative Regional Navigation Risk Assessment presented in Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). The shipping and navigation assessment was undertaken with a Maximum Design Scenario (Table 7.16 of Volume 2, Chapter 7: Shipping and navigation (APP-059)) with 90% of the length of inter-array cables buried to a minimum depth of 0.5 m which would greatly reduce the risk of snagging of fishing gear. Where cables are not sufficiently buried, the Mona Offshore Wind Project would address this with additional mitigation. With mitigations proposed by the Mona Offshore Wind Project in place, the risk of snagging of fishing gear was assessed as minor adverse in Section 7.9.11 of Volume 2, Chapter 7: Shipping and navigation (APP-059). An assessment of impacts to Search and Rescue was undertaken in Section 7.9.6 of Volume 2, Chapter 7: Shipping and navigation (APP-059) in compliance with Maritime and Coastguard Agency requirements in MGN654 Annex 5. The assessment concluded that with commitments to two lines of orientation and minimum spacing between wind turbines and offshore substation platforms, safe and effective Search and Rescue could still be conducted within and around the Mona Offshore Wind Project, and other cumulative adjacent projects.
REP1-075.14	General navigation The SFF have concerns about the proposal's impacts on navigation and cumulatively with regard to other windfarm proposals. Again, experience of fishing in other fixed foundation offshore windfarms i.e. Seagreen Windfarm in 2024 for King Scallops the fishing vessel skipper, on top of fishing had to secure the safety of the vessel with increased risk caused by: - 1. Other fishing vessels operating within the 'alley ways' between the cable routing between Wind Turbine Generators (WTGs). 2. Existing marine traffic. 3. Inter-array cables, and 4. Multiple rock protection measures. The FLCP theoretically does offer greater scope for coexistence compared to Seagreen, however, we expect like Seagreen that Mona would find itself not being able to successfully bury cables in certain areas therefore requiring increased rock protection. This would result in SFF member vessels having little confidence to tow over the cables, and subsequently lead to a heightened fishing risk. The Mona proposal also raises concerns for transiting to and from ports such as Kirkcudbright when not fishing and during emergency situations, e.g. airlifting of casualties, engine failure scenarios. This is particularly the case in terms of the cumulative impact of up to a total of 4 OWFs proposed for the Irish Sea within current navigation routes.	
REP1-075.15	Fish and Shellfish Ecology (Doc ref F2.3, page 201 paragraph 3.11.5.14) We strongly disagree that the effect on Queen and King Scallop biomass is "minor adverse", and such an assessment without any scientific research is an assumption. Furthermore Table 3.34 concludes that there will be no ongoing monitoring required around the effect the	The available research on queen and king scallop responses to impacts including temporary habitat loss and disturbance, increased suspended sediment concentrations, and long term habitat loss has been assessed within Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), with these species included specifically as important ecological features and their higher sensitivity to each impact considered in the conclusion. For each impact (both for the project alone and cumulatively with other projects and plans), the overall assessment concluded

Reference	Written Representation Comment	Applicant's response
	project shall have on fish and shellfish. This evaluation is so disappointing and unjust, and this again is strongly opposed by the SFF, we have no scientific data for Queen Scallops therefore the impact cannot be deemed as minor adverse. The SFF would suggest that until proved otherwise the magnitude of impact should be raised to moderate/major. The SFF therefore insists that a robust monitoring plan must be put in place using a baseline of three years prior to construction, during construction and every three years after operation, through to decommissioning if the prosed Mona OWF achieves consent.	no significant impact (minor adverse significance) in all project phases, with no further specific mitigation measures or monitoring considered required beyond the measures adopted as part of the project (in line with 2022 CIEEM guidance (CIEEM, 2022)). Impacts to queen scallop from temporary habitat loss/disturbance, long term habitat loss and the potential for impacts on queen scallop from deposits of resuspended sediments during construction are presented in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), sections 3.9.2, 3.9.5 and 3.9.4 respectively. Due to the nature of the sediment disturbance and the relatively rapid reintegration of disturbed sediments into the existing sediment transport regime (see Volume 2, Chapter 1: Physical processes (APP-053) and Volume 6, Annex 1.1: Physical processes technical report (APP-086)), suitable sediment is anticipated to be available to support spat settlement and habitation by queen scallop following cessation of construction activities, as outlined in paragraph 3.9.2.19 onwards in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). Areas subject to resettlement of significant thicknesses of suspended sediments during construction activities are expected to be close to the source, with this sediment material reintegrated into the sediment transport regime within a few tidal cycles. This reduces the potential for long term changes to the substrate/habitat composition, as discussed within paragraph 3.9.4.16 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). Further details of the modelled deposition of suspended sediments are presented within Volume 2, Chapter 1: Physical processes (APP-053) and Volume 6, Annex 1.1: Physical processes technical report (APP-086). As outlined above, based upon the assessment conclusions resulting in no predicted significant effects to queen and king scallop, no mitigation or monitoring is proposed beyond the measures outlined within the assessment for fish and shellfish ecology (Volume 2, Chapter 3: Fish and shellfish ecology; APP-055) and commercial fisheries (Volume 2, Chapter 6: Commercial fisheries; APP-058).
REP1-075.16	Offshore Wind Farms have been developed on King Scallop beds around the UK, areas in which we have fished and observed the scallops' survivability. King Scallops, however, are a different species with sensory structures that have been shown to resist the effects of electromagnetic pulses (EMPs), construction noise, and turbine vibrations. However, there is no scientific data published yet on how offshore wind farms will impact Queen Scallops. The FLCP attempts to	Enabling co-existence is a key aim underpinning the Applicant's commitments to not close the entire development area during construction, the SMZ and the orientation and spacing of infrastructure. During the construction phase, fishing receptor groups will be able to continue fishing within those parts of the Mona Array Area where construction is not being undertaken. During the operations and maintenance phase, the measures adopted as part of the Mona Offshore Wind Project, such as the SMZ, minimum infrastructure spacing of 1,400 m and roughly north-to-south alignment of wind turbine rows (as set out in the Outline FLCP

Reference	Written Representation Comment	Applicant's response
	keep most of the Queen Scallop grounds within Mona free from development (Figure 1.3, doc ref J13), but we have serious concerns that disturbances and alterations to the seabed east of this corridor could detrimentally affect unfished areas considered by fishermen to be nursery and spawning grounds.	(APP-199)), will provide the space for continued fishing within the Mona Array Area and fishing vessels will also be able to transit through this area. The impacts to fish and shellfish ecology receptors, including queen scallop, for impacts of electromagnetic fields and underwater sound are presented within sections 3.9.3 and 3.9.6 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), informed by current peer-reviewed literature. The area to the east of the Mona Offshore Wind Project is not expected to be subject to disturbance as a result of the Project, and as this area is considered a nursery/spawning area which is unfished, spawning and nursery in this area is expected to be unimpeded by the Project. As shown within Figure 1.2 of Volume 6, Annex 2.1: Benthic subtidal and intertidal ecology technical report (APP-087), broadscale habitat mapping indicates the presence of coarse and mixed substrate beyond the boundaries of the Mona Offshore Wind Project, suggesting that suitable habitat is available within the region adjacent to the Project to support recovery of queen scallop into areas which are subject to temporary habitat loss/disturbance.
REP1-075.17	Further research is necessary into the ecosystem and the marine environment that could potentially alter the Queen Scallop habitat. Across the UK, many wind farms have been constructed on shallow banks that support King Scallop dredging; in these areas, King Scallops are recruited from other unfished seabeds. The Mona proposal would be unique as they would impact the sandy gravelly grounds where both the spawning and recruitment of Queen Scallops occur.	The Applicant notes these concerns. The area to the east of the Mona Offshore Wind Project is not expected to be subject to disturbance as a result of the Mona Offshore Wind Project, and as noted in the response to REP1-075.16 above, this area is considered a nursery/spawning area which is unfished, therefore spawning and nursery in this area is expected to be unimpeded by the Project. As shown within Figure 1.2 of Volume 6, Annex 2.1: Benthic subtidal and intertidal ecology technical report (APP-087), broadscale habitat mapping indicates the presence of coarse and mixed substrate beyond the boundaries of the Mona Offshore Wind Project, suggesting that suitable habitat is available within the region adjacent to the Project to support recovery of queen scallop into areas which are subject to temporary habitat loss/disturbance. Further, impacts to queen scallop habitat through seabed disturbance and the deposition of suspended sediments are predicted to be short-lived, with disturbed sediments rapidly reintegrated into the existing sediment transport regime and redistributed, with any longer term sediment changes as a result of sedimentation predicted to be highly localised within the immediate vicinity of installed infrastructure (Volume 6, Annex 1.1: Physical processes technical report (APP-086), Volume 2, Chapter 1: Physical processes (APP-053), Volume 2, Chapter 3: Fish and shellfish ecology (APP-055)).

Reference	Written Representation Comment	Applicant's response
REP1-075.18	In addition, as the mentioned areas are suitable for herring spawning, the SFF are concerned about the Development impacts on all commercial value fish species in the area, especially the Development impacts on the herring which are also particularly sensitive to noise impacts as they have swim bladders which are involved in hearing (Popper et al., 2014)/ Sub-section 9.5.3.1 of this SR.	The Applicant notes this concern. The assessment of impacts to herring from underwater sound as a result of construction activities, including piling, is presented within section 3.9.3 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). Due to herring's high sensitivity to underwater sound, and following a precautionary approach, both the assessment for the Mona Offshore Wind Project alone and cumulatively with other projects and plans resulted in a predicted potential moderate adverse effect to herring at the Douglas Bank spawning ground during the spawning season, which is significant in EIA terms. Impacts to herring from underwater sound during construction will be managed through an Underwater Sound Management Strategy (UWSMS) to ensure effects are reduced to non-significant, an outline of which was submitted with the Application (APP-202), which is secured within the deemed marine licence in Schedule 14 of the draft DCO (C1 Draft Development Consent Order F04) and expected to be secured within the standalone marine licence.
REP1-075.19	We are of view that Developers must take heed of ICES advice on Irish Sea herring. ICES state in their advice for 2024 for Herring in Division 7.a North that activities that have a negative impact on the spawning of herring are considered as a source of risk for the species. Therefore, SFF propose the above-mentioned ICES advice to be taken into account and acted upon at determination stage. The link to ICES advice on Irish Sea herring is provided as follows: Irish Sea Herring 7.a North	The Applicant acknowledges the high sensitivity of herring to underwater sound impacts, with this reflected in the assessment presented in section 3.9.3 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055) which concluded a moderate adverse impact on herring at the Douglas Bank spawning ground during the spawning season for the project alone and cumulative assessments, following a precautionary approach to assessment. As outlined in the Applicant's response to REP1-075.18 above, impacts from underwater sound will be managed through implementation of an UWSMS, an Outline of which was provided with the Application (APP-202).
REP1-075.20	On behalf of the SFF we appreciate the opportunity to submit this written response and reiterate the SFF robustly objects to the application as it negatively impacts our members.	The Applicant looks forward to continuing the high level of engagement with the SFF undertaken to date so that the issues covered in their Written Representation can be further discussed and resolved.

2.12 Scottish Whitefish Producers Association Limited (SWFPA)

Table 2.12: REP1-076 - Scottish Whitefish Producers Association Limited

Reference	Written Representation Comment	Applicant's response
REP1-076.1	The SWFPA appreciate the opportunity to respond to the application regarding the Mona Offshore Wind Farm. The SWFPA protects and promotes the interests of over 220 member vessels using all methods of fishing gear both static and mobile, a significant number of vessels are nomadic in nature and have fished both sustainably and profitably within the Mona array for many decades. Summary The Queen scallop fishery is the most important fishery within the Mona array and supports substantial shoreside employment, as well as offshore. If this fishery ceases to exist, for whatever reason, the impact on the local infrastructure and the coastal communities which this fishery supports would be devastating. This would also highlight serious misgivings in marine spatial planning, the Mona array should never have been given an agreement for lease, from a safety, navigational and socio-economic perspective. The SWFPA fully recognise the need for renewable energy to tackle climate change, energy security, and to reduce consumer bills, however this should be achieved in a balanced manner. Certain arrays should never have been considered, Mona array being one of them, therefore for the following reasons highlighted within the written response the SWFPA strongly object to the application.	The Applicant notes the response and acknowledges the extent and distribution of queen and king scallop fishing activity within the vicinity of the Mona Array Area. The Applicant also notes the importance of this area not only to commercial fishing vessels but also associated onshore processing activities.
REP1-076.2	West Coast Sea Products Ltd (association members of the SWFPA) have been catching and processing Queen Scallops in the eastern Irish Sea since 1971 and in addition King Scallops. The proposed Mona offshore windfarm array directly overlaps the most important Queen Scallop beds which WCSP and other SWFPA scallop vessel members rely on annually. The Mona array footprint is situated directly on top of the highest yielding Queen Scallop fishery in	The Applicant recognises the importance of queen scallop landings to West Coast Sea Products Ltd and has engaged with the company since 2021 to establish the special extent of nomadic fleet. Spatial distribution of fishing activity using VMS data, supported by feedback from project-specific consultation, highlighted that the central and west part of the Mona Array Area is an important queen and king scallop fishing ground for vessels utilising dredges (as presented in section 1.4.8.5 of Volume 6, Annex 5.6: Commercial Fisheries Technical Report (APP-097). It is evident that dredge activity and intensity varies by year, which also corroborates

Reference	Written Representation Comment	Applicant's response
	Europe. This fishery not only supports many local fishermen and processing employees on land in Kirkcudbright it also supports many more members of the SWFPA nomadic scallop fishing vessel. The reality is this unique fishery cannot be displaced elsewhere, there is nowhere else that these species (Queen Scallops) can be caught round the UK coastline. Globally there are 4 main Queen Scallop fisheries which supply the French and American markets (Peruvian, Argentine, Chile, Faroese & UK (Irish Sea).	with information from fisheries stakeholders, which suggest that the fishery is cyclical over seven-to-eight-year periods. The Applicant contests that "*there is nowhere else that these species (Queen Scallops) can be caught round the UK coastline*" but does recognise that there are a limited number of areas around the UK coastline where it is permitted to catch queen scallops using a dredge. For example, we note there is also an established fishery for queen scallops off the north coast of Northern Ireland (Marine Scotland, 2017).The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 to understand stakeholder requirements for coexistence as summarised in Table 6.5 of Volume 2, Chapter 6: Commercial fisheries (APP-058) and detailed in Appendix H of the Technical Engagement Plan Appendices - Part 2 (F to M) (APP-042). Engagement will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan (FLCP) will be developed by the Applicant through ongoing consultation with fisheries stakeholders, which will be based on the Outline FLCP (APP-199) submitted as part of the application and secured through the deemed marine licence (Condition 18 in Schedule 14 of the draft Development Consent Order (DCO) (C1 Draft Development Consent Order F04) and is expected to be secured in the standalone marine licence. Mitigation and monitoring commitments are set out within Volume 2, Chapter 6: Commercial fisheries (APP-058) and the Mitigation and monitoring schedule (J10 F02). The mitigation measures are designed to enable coexistence as far as possible during all project phases. They include commitments to not close the entire development area during the construction phase, the establishment of a Scallop Mitigation Zone (SMZ) which will be free of wind turbines and offshore substation platforms (a commitment which is a 'first' for offshore wind in the United Kingdom as far as the Applicant is aware) and the orientation and spacing of infrastructure such that fishing can continue within the Mona Array Area. As a result of these measures, commercial fishing receptor groups will be able to continue fishing within parts of the Mona Array Area during construction. During the operations and maintenance phase, the measures will provide the space for continued fishing within the Mona Array Area and allow fishing vessels to transit through the area. Fishing will also be permitted within those parts of the Mona Offshore Cable Corridor where construction activities are not taking place. This will be achieved via the use of rolling advisory exclusion zones of 500 m around vessels installing export cables. This will avoid the entire Mona Offshore Cable Corridor being

Reference	Written Representation Comment	Applicant's response
		closed to fishing vessels during the construction phase. Additionally, the use of 500 m rolling advisory exclusion zones will apply to the installation of inter-array and interconnector cables.
REP1-076.3	Volume 2, Chapter 6: Commercial Fisheries Page 45. 6.5.2.4 The significance of the effect upon commercial fisheries is determined by correlating the magnitude of impact with the sensitivity of the receptor. The method employed for this assessment is presented in Table 6.12. Where a range of significance of effect is presented, the final assessment for each effect is based upon expert judgement. It is SWFPA understanding that the expert judgement is the consultants that compiled the commercial fisheries chapter. Presently, there is no methodology or standardisation on how the impacts and effects are calculated, therefore we dispute the findings on the basis that it is not factual and only based on assumptions. Despite efforts by the applicant and provision of the Draft Fisheries Liaison and Cooperation Plan (FLCP), we cannot support the application for the inevitable impact it will have on the Queen Scallop fishing and processing industry. The ES chapter defines the impact as Minor; we anticipate the effect of the development could be considerable and rate it as Major. We would therefore request the applicant, and the expert judgement expand on why they define the impact as minor?	The SWFPA is correct in their comment that the significance of effect upon commercial fisheries is a two-stage process and is determined by correlating the magnitude of impact with the sensitivity of the receptor. As described in Volume 1, Chapter 5: Environmental Impact Assessment (EIA) methodology (APP-052), in cases where a range is suggested for the significance of effect (as highlighted in the SWFPAs comment), there remains the possibility that this may span the significance threshold (i.e. where the significance of effect is defined as "Minor or Moderate" in Table 6.12 of Volume 2, Chapter 6: Commercial fisheries (APP-058)). In such cases, the final significance is based upon the commercial fisheries expert's professional judgement as to which outcome delineates the most likely effect. Where this occurs, an explanation as to why this conclusion has been reached is provided. The Applicant disagrees with the statement that "*presently, there is no methodology or standardisation on how impacts and effects are calculated*". The impact assessment methodology is detailed in section 6.5 of Volume 2, Chapter 6: Commercial fisheries (APP-058) and has followed the methodology set out in Volume 1, Chapter 5: EIA methodology (APP-052). The EIA methodology complies with key legislation and guidance, as set out in section 5.2 of Volume 1, Chapter 5: EIA methodology (APP-052). The Applicant has assumed that the key impact of concern to the SWFPA and which forms the basis of their comment, is 'loss or restricted access to fishing grounds' as assessed in section 6.8.2 of Volume 2, Chapter 6: Commercial fisheries (APP-058). The Applicant engaged with fishing stakeholders in Autumn 2022, post-scoping, on requirements to allow access to and continued fishing within Mona Array Area and Mona Offshore Cable Corridor. As set out under section 6.3 in the Volume 2, Chapter 6: Commercial fisheries (APP-058), this engagement highlighted a preference for avoidance of infrastructure over queen scallop grounds, sufficient spacing between infrastructure to allow continued access and fishing, orientation of wind turbines against dominant towing directions, burying of cables and minimising the use of cable protection. In Winter 2022, further engagement was undertaken specifically with scallop fishing stakeholders on the potential development of a SMZ.

Reference	Written Representation Comment	Applicant's response
		Whilst feedback from this engagement was helpful and constructive, it was not feasible to refine initial proposals into formal mitigation measures and obtain agreement with stakeholders prior to publication of the Preliminary Environmental Information Report (PEIR). Additionally, the Applicant was keen to understand the views of stakeholders across the wider proposal through the statutory consultation on the PEIR, to determine the full suite of changes potentially required to address any concerns raised. Therefore, the assessment presented within the PEIR did not include these potential mitigation measures and consequently concluded a moderate adverse impact (which is significant in EIA terms) for 'loss or restricted access to fishing grounds' for the Scottish west coast scallop receptor group. Following the publication of the PEIR and in light of commercial fisheries and wider feedback on the PEIR, the Applicant met with commercial fisheries stakeholders in September 2023 to provide more specific details on the following mitigation measures, which were well received (see Appendix H.21 of the Technical Engagement Plan Appendices - Part 2 (F to M) (APP-043)): • Increased spacing from 1,000 m between rows of wind turbines and OSPs and 875 m between wind turbines and OSPs in a row to a minimum of 1,400 m within or between rows, subject to micrositing – to increase ability to travel through and fish within the wind farm array area • Inclusion of a SMZ over core queen scallop grounds to reduce potential for impacts to scallop and enable continued fishing of these core grounds by vessels that currently fish in this area • Orientation of wind turbines rows in a roughly north south orientation to allow vessels to maintain the dominant tow direction in this area • Commitment to burying cables as far as possible and minimising cable protection where burial is not possible to reduce the potential for gear snagging risks and maintain ability to continue fishing within the order limits. These commitments have been secured in the Outline FLCP (APP-199) with the requirement for the Final FLCP (which must accord with the commitments of the Outline FLCP), secured under Schedule 14 of the draft DCO (C1 Draft Development Consent Order F04) and expected to be secured in the standalone marine licence. In light of the commitments to the preceding mitigation and on the basis that fishing will be able to continue within the Mona Array Area during the operational phase, the assessment in Volume 2, Chapter 6: Commercial fisheries (APP-058) concluded a minor adverse impact (which is not significant in EIA terms) on 'loss

Reference	Written Representation Comment	Applicant's response
		or restricted access to fishing grounds' for the Scottish west coast scallop receptor group.
REP1-076.4	Outline Fisheries Liaison and Co-Existence Plan (J10) Through consultation with the applicant, a draft FLCP has been presented to support the application. This includes several measures which would help to achieve the ambition of coexistence between the Queen and King Scallop fishery and the proposed Mona array. The applicant has included measures which we do support such as North-South rows of WTGS and inter array cables (IACs) with 1400m spacing. (However worst case could be reduced to 1250m in special circumstances). This aids fishing activities which are dictated by the tides when fishing in this area. The Scallop Mitigation Zone (SMZ) which although welcomed, is a smaller area than the SWFPA expected following consultation with the fishing industry and as highlighted there will be multiple IACs within the SMZ.	In response to queries from the Examining Authority during the Mona Issue Specific Hearing 1, the Applicant stated that the minimum spacing of infrastructure could be reduced to 1,275 m if at any point between submission of the design plan (see below) and commencement of construction at a given location, it is identified that micrositing is required to avoid, for example, archaeological resources not previously recorded at that location. In fact, where micrositing is required to the full allowance of 125 m at each of two adjacent locations, the minimum separation distance of 1,400 m could be reduced to 1,150 m (as clarified in the post hearing note included in paragraph 26 of the Issue Specific Hearing 1 Summaries (REP1-009). However, the likelihood of this scenario, and the need for micrositing in general, is low. At the point at which any micrositing is identified, Mona Offshore Wind Project would have been through the following steps: • Undertaken pre-construction geophysical and geotechnical surveys to finalise the design of the Mona Offshore Wind Project and array layout avoiding any newly identified constraints • Submitted a design plan to the licencing authority for approval in consultation with the Maritime Coastguard Agency and Trinty House setting out the grid coordinates for every single wind turbine generator, Offshore Substation Platform (OSP) and cable as required under Condition 18 of Schedule 14 in the draft DCO (C1 Draft Development Consent Order F04). The Applicant acknowledges the support given to commitments presented within the Outline FLCP (APP-199) and the SWFPA's preference for no inter array cables (or cable protection if/where required, for example at crossings with existing telecommunications cables) within the SMZ. However, the option to place cables and cable protection within the SMZ has been retained to ensure an efficient array and transmission system. The Applicant has committed to minimising cable installation within the SMZ where possible and where cable routing through the SMZ is required, aligning cables north-south over east-west as far as practically possible. This is compatible with dominant tow orientations exhibited by scallop vessels and the direction of static gear deployment within the Mona Array Area (such information was communicated via Project-specific consultation as set out in Table 6.5 of Volume 2, Chapter 6: Commercial fisheries (APP-058)).
REP1-076.5	Crossings of the 4 existing telecommunication cables within the SMZ, which will require rock protection, will in turn reduce the SMZ further as the rock protection footprint must be avoided by scallop vessels.	
REP1-076.6	A significant concern of the FLCP is the commitment towards cable burial between WTGs of only 0.5m minimum burial depth and the use of rock protection in areas of cable	As described within Volume 1, Chapter 3: Project Description (APP-050), the offshore export cables, interconnector cables and inter-array cables will be buried below the seabed wherever possible and protected with a hard-protective layer

Reference	Written Representation Comment	Applicant's response
	crossings (67) and where burial depth cannot be achieved. It is unknown at this stage from the survey work carried out by the applicant how successful IACs will be buried. We feel that a Cable Burial Risk Assessment (CBRA) should have been tabled prior to commitment on minimum burial depth. Carbon Trusts Guidance on Cable Burial 2015 which all CBRA are based states there should be at least 100% contingency on both anchor penetration and fishing gear whichever is the greater. We therefore suggest that this minimum burial depth must be revisited by the applicant prior to the determination.	(such as rock or concrete mattresses) where adequate burial is not achievable. Depending on the Cable Burial Risk Assessment (CBRA), it is expected that the offshore export cables and interconnector will be buried to a target depth of 1 m, with a maximum burial depth of 3 m and a minimum burial depth of 0.5 m. The maximum percentage of export and interconnector cable route requiring cable protection is 20%. Also depending on the CBRA, it is expected that inter-array cables will be buried to a target depth of 2 m with a maximum burial depth of 6 m and a minimum burial depth of 0.5 m. The maximum percentage of the inter-array cable route requiring cable protection is 10%. The CBRA will be undertaken post-consent and will inform cable burial depth, which will be dependent on ground conditions as well as external risks.
REP1-076.7	The WCSP fishing expertise in the array are more than aware of hard areas of ground to the west within the array who would predict that burial depth will not be achieved therefore, as a result would require rock armour protection. All applicants state within their EIAs that they would achieve 80% total burial however in most cases this is never the case.	The use of cable protection beyond the limits assessed in relevant chapters of the Environmental Statement is controlled within the draft DCO (C1 Draft Development Consent Order F04) and expected to be controlled in the standalone marine licence. Within the Draft DCO, Table 4 in Schedule 14 sets a maximum limit on cable protection volume and area for inter-array and interconnector cables within the Mona Array Area. These limits are based on protection of up to 10% and 20% of total cable length being protected for inter-array cables and interconnector cables respectively. Similar limits on footprint and area of cable protection are expected to be set out in the standalone marine licence for the export cables. The Applicant will not be able to exceed these limits without variation to the deemed marine licence/standalone marine licence, which the licencing authority would likely consult on with relevant stakeholders. Additionally, Condition 27 in Schedule 14 of the draft DCO requires that the Applicant provides the licensing authority and the JNCC with a report setting out details of the cable protection and scour protection used for the authorised scheme including the volumes of scour and cable protection used.
REP1-076.8	The SWFPA are deeply concerned that the ambitions of the FLCP do not go far enough with a shallow target burial depth. Experience from other OWFs and members of the SWFPA fishing within them such as Seagreen and Moray East we have found consistently that burial is generally unsuccessful, hence why we are extremely concerned with the proposed development.	
REP1-076.9	In addition, there is evidence of cables becoming exposed (10miles southeast) at Gwynt y Mor OWF (commissioned 2015) in a near identical substrate. Extract from Notice to Mariners NtM, "a significant number of array cable exposures are still being reported. Due to the mobile nature of the seabed within the wind farm boundary these cable exposures are subject to change and may develop in areas where there were none previously"1. Should Mona be constructed, it is inevitable, following construction that a series of cable exposures will occur and could render the FLCP worthless as it would be too high a risk to operate safely within the array.	The Applicant notes that the SWFPA have suggested that a CBRA should already have been undertaken to inform the minimum burial depth stated within the Environmental Statement. The Applicant maintains that it is not possible to effectively carry out a CBRA which encompasses the full range of project design options which have been included in Maximum Design Scenario (MDS). To be effective, the CBRA must be based upon final cable routes, which will be determined post-consent and is subject to the acquisition of geotechnical and geophysical data and the completion of detailed project design. As such, the burial depths stated in Volume 1, Chapter 3: Project Description (APP-050) can only be indicative at this stage. Prior to any construction activities commencing, an offshore construction method statement (CMS) which includes a cable

Reference	Written Representation Comment	Applicant's response
		specification and installation plan (CSIP) incorporating a CBRA will be developed and submitted to the licencing authority for approval prior to commencement of construction. Development and adherence to the offshore CMS is secured within the deemed marine licence under Condition 18 in Schedule 14 of the draft Development Consent Order (DCO) and expected to be secured within the standalone marine licence. The Applicant notes the cable exposures in the East Irish Sea and for other UK projects which have been highlighted by the SWFPA. The Mona Offshore Wind Project has committed to monitoring of cables and their burial status to reduce snagging risk, which will be included in the Offshore CMS. Within the Outline FLCP (APP-198) the Applicant has also committed to the use of guard vessels should cables become exposed, which will ensure navigational safety and minimise the potential risk of gear snagging posed by exposed cables until such risks have been mitigated.
REP1-076.10	An additional concern of the FLCP is the SMZ, which, based upon the WCSP providing coordinates to the applicant, the SMZ corridor as it stands is some 3.2km in width, however is only circa 35% of what was communicated to the applicant. It is also noted that the SMZ is indicative, the SMZ could be reduced further.	The Applicant acknowledges the SWFPA's comment regarding the indicative size of the SMZ within the Mona Array Area (REP1-076.10) and notes that this differs from the more positive feedback received during the project design update meeting undertaken in September 2023 (Appendix H.21 of the Technical Engagement Plan Appendices - Part 2 (F to M) (APP-043)). At present, the SMZ covers an approximate total of 37% of scallop grounds located within the Mona Array Area. The Applicant confirmed in Response to Hearing Action Points F01 (REP1-012) following Issue Specific Hearing 2 that the indicative SMZ presented in figure 1.3 of the Outline FLCP (APP-199) is approximately 57 km^2. The Applicant will commit to maintaining the SMZ at 57 km^2 by including this commitment within an update to Table 1.2 of the Outline FLCP (APP-199) at Deadline 3.. Volume 2, Chapter 6: Commercial fisheries (APP-058) has acknowledged the significant importance of scallop fishing in the vicinity of the Mona Array Area and Offshore Cable Corridor. Enabling co-existence is a key aim underpinning the Applicant's commitments to not close the entire development area during construction, the SMZ and the orientation and spacing of infrastructure (as set out in the Outline FLCP (APP-199)). During the construction phase, it will be possible for fishing activities to continue within those parts of the Mona Array Area where construction is not being undertaken. During the operations and maintenance phase, the measures adopted as part of the Mona Offshore Wind Project, such as the SMZ, minimum infrastructure spacing of 1,400 m and roughly north-to-south alignment of wind turbine rows (as set out in the Outline FLCP (APP-199)), will provide the space for continued fishing within the Mona Array Area and fishing
REP1-076.11	Our understanding of the draft FLCP and the SMZ has been reduced because the developer chose not to utilize the eastern extents of the original lease area due to poorer wind yields. Given that there are operating windfarms to the east of Mona and should the applicant have developed to the East, the Mona array would not have encroached upon valuable fishing ground. With implementation of the FLCP this would not reduce the impact adequately therefore we anticipate the proposal to have a major effect on our operations.	
REP1-076.12	The Mona array and the export cable corridor (ECC) to the South shall be situated on circa 40% of 2023's fishing activity. In examining the SMZ detailed in the FLCP the net impact would mean that circa 30% of 2023 fishing activity for Queen Scallop fishing would fall within Mona not covered by the Scallop Mitigation Zone (SMZ).	

Reference	Written Representation Comment	Applicant's response
		vessels will also be able to transit through this area. Whilst it is noted that the SWFPA state that circa 30% of 2023 fishing activity for queen scallop took place in areas outside the SMZ, it is important to recognise that fishing will also be permitted in parts of the Array that do not lie within the SMZ.
REP1-076.13	Other Considerations Weather The Commercial fisheries chapter and FLCP does not factor in the impact that poor weather will have on the decision making of fishing vessel skippers. Experience from existing fixed foundation offshore windfarms, most skippers will only attempt to fish when the weather conditions are ideal. The Mona project area is situated on top of autumn and winter Queen and King Scallop fisheries as dictated by the seasonality of the product, i.e. fished when yields are at their peak in the autumn and winter months. As a result, fishery management measures and closed seasonal areas have been implemented, the SWFPA expect Mona will have a High level of magnitude to our members as presently skippers will fish in slightly poorish weather, however will be hesitant to enter with the hazards imposed by a windfarm.	The Applicant has assessed the potential impacts of the Mona Offshore Wind Project on navigational safety for fishing boats within Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). This included risk to vessels engaged in fishing within the Mona Array Area or along the Mona Offshore Cable Corridor, and fishing vessels on transit passing adjacent to or through the Mona Array Area and included consideration of adverse weather conditions. The risk of collision and allision with wind turbines or offshore substation platforms, as well as vessels operating within or adjacent to the Mona Array Area was identified as part of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) in hazards 3, 4, 8, 17 and 25. These were discussed during the hazard workshop undertaken in October 2024, which was attended by representatives from fishing organisations (Anglo Northern Irish Fish Producers Organisation (ANIFPO) and SWFPA) and these hazards were scored as Medium Risk – Tolerable if As Low as Reasonably Practicable (ALARP). Section 1.8.5 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) discusses impacts to fishing, noting issues surrounding "Spatial Squeeze" and reflected the levels of fishing activity detected as part of the vessel traffic surveys reported in Section 1.6 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). These hazards recognised that causes could include the presence of infrastructure and therefore reduced sea room, adverse weather conditions and increased vessel traffic amongst others. On the basis that crews of fishing vessels are trained, the vessels are equipped with navigational equipment and the spacing between Mona Offshore Wind Project infrastructure exceeds the spacing of other offshore wind farms in the UK, these risks were determined to be ALARP. Similar conclusions were reached within the Cumulative Regional Navigation Risk Assessment presented in Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). The shipping and navigation assessment was undertaken with a Maximum Design Scenario (Table 7.16 of Volume 2, Chapter 7: Shipping and navigation (APP-059)) with 90% of the length of inter-array cables buried to a minimum depth of 0.5 m which would greatly reduce the risk of snagging of fishing gear. Where cables are not sufficiently buried, the Mona Offshore Wind Project would address this with additional mitigation. With mitigations proposed by the Mona Offshore Wind Project in place, the risk of snagging of fishing gear was assessed as minor
REP1-076.14	General navigation The SWFPA have concerns about the proposal's impacts on navigation and the cumulative effect of other windfarm proposals within the area. Again, experience of fishing in other fixed foundation offshore windfarms i.e. Seagreen Windfarm in 2024 for King Scallops, the fishing vessel skipper, on top of fishing had to secure the safety of the vessel with increased risk caused by:- 1. Other fishing vessels operating within the 'alley ways' between the cable routing between Wind Turbine Generators (WTGs) 2. Existing marine traffic 3. Inter-array cables 4. Multiple rock protection measures The FLCP does offer greater scope for coexistence compared to Seagreen theoretically however we expect like Seagreen that Mona would find itself not being able to successfully bury cables in certain areas therefore increased	

Reference	Written Representation Comment	Applicant's response
	rock protection. This would result in SWFPA member vessels having little confidence to tow over the cables, and subsequently lead to a heightened fishing risk. The Mona proposal also raises concerns for transiting to and from ports such as Kirkcudbright when not fishing and during emergency situations, e.g. airlifting of casualties, engine failure scenarios. This is particularly the case in terms of the cumulative impact of up to a total of 4 OWFs proposed for the Irish Sea within current navigation routes.	adverse in Section 7.9.11 of Volume 2, Chapter 7: Shipping and navigation (APP-059). An assessment of impacts to Search and Rescue was undertaken in Section 7.9.6 of Volume 2, Chapter 7: Shipping and navigation (APP-059) in compliance with Maritime and Coastguard Agency requirements in MGN654 Annex 5. The assessment concluded that with commitments to two lines of orientation and minimum spacing between wind turbines and offshore substation platforms, safe and effective Search and Rescue could still be conducted within and around the Mona Offshore Wind Project, and other cumulative adjacent projects.
REP1-076.15	Fish and Shellfish Ecology Doc ref F2.3, page 201 paragraph 3.11.5.14, We strongly disagree that the effect on Queen and King Scallop biomass is "minor adverse," and such an assessment without any science is an assumption. Furthermore Table 3.34 concludes that there will be no ongoing monitoring required around the effect the project will have on fish and shellfish. This evaluation is so disappointing and unjust, and again this is strongly opposed by the SWFPA; we have no science for Queen Scallops therefore the impact cannot be deemed as minor adverse. The SWFPA would suggest that until proved otherwise the magnitude of impact should be raised to moderate/major. The SWFPA therefore insists that a robust monitoring plan must be put in place using a baseline of three years prior to construction, during construction and ever three years after operation, through to decommissioning if the prosed Mona OWF achieves consent.	The available research on queen and king scallop responses to impacts including temporary habitat loss and disturbance, increased suspended sediment concentrations, and long term habitat loss has been assessed within Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), with these species included specifically as important ecological features and their higher sensitivity to each impact considered in the conclusion. For each impact (both for the project alone and cumulatively with other projects and plans), the overall assessment concluded no significant impact (minor adverse significance) in all project phases, with no further specific mitigation measures or monitoring considered required beyond the measures adopted as part of the project (in line with 2022 CIEEM guidance (CIEEM, 2022)). Impacts to queen scallop from temporary habitat loss/disturbance, long term habitat loss and the potential for impacts on queen scallop from deposits of resuspended sediments during construction are presented in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), sections 3.9.2, 3.9.5 and 3.9.4 respectively. Due to the nature of the sediment disturbance and the relatively rapid reintegration of disturbed sediments into the existing sediment transport regime (see Volume 2, Chapter 1: Physical processes; APP-053 and Volume 6, Annex 1.1: Physical processes technical report; APP-086), suitable sediment is anticipated to be available to support spat settlement and habitation by queen scallop following cessation of construction activities, as outlined in paragraph 3.9.2.19 onwards in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). Areas subject to resettlement of significant thicknesses of suspended sediments during construction activities are expected to be close to the source, with this sediment material reintegrated into the sediment transport regime within a few tidal cycles. This reduces the potential for long term changes to the substrate/habitat composition, as discussed within paragraph 3.9.4.16 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). Further details of the modelled deposition of

Reference	Written Representation Comment	Applicant's response
		suspended sediments are presented within Volume 2, Chapter 1: Physical processes (APP-053) and Volume 6, Annex 1.1: Physical processes technical report (APP-086). As outlined above, based upon the assessment conclusions resulting in no predicted significant effects to queen and king scallop, no mitigation or monitoring is proposed beyond the measures outlined within the assessment for fish and shellfish ecology (Volume 2, Chapter 3: Fish and shellfish ecology; APP-055) and commercial fisheries (Volume 2, Chapter 6: Commercial fisheries; APP-058).
REP1-076.16	Offshore Wind Farms have been developed on King Scallop beds around the UK, areas in which we have fished and observed the scallops' survivability. King Scallops, however, are a different species with sensory structures that have been shown to resist the effects of electromagnetic pulses (EMPs), construction noise, and turbine vibrations. However, there is no scientific data yet on how offshore wind farms will impact Queen Scallops. The FLCP attempts to keep most of the Queen Scallop grounds within Mona free from development (Figure 1.3, doc ref J13), but we have serious concerns that disturbances and alterations to the seabed east of this corridor could detrimentally affect unfished areas considered by fishermen to be nursery and spawning grounds.	Enabling co-existence is a key aim underpinning the Applicant's commitments to not close the entire development area during construction, the SMZ and the orientation and spacing of infrastructure. During the construction phase, fishing receptor groups will be able to continue fishing within those parts of the Mona Array Area where construction is not being undertaken. During the operations and maintenance phase, the measures adopted as part of the Mona Offshore Wind Project, such as the SMZ, minimum infrastructure spacing of 1,400 m and roughly north-to-south alignment of wind turbine rows (as set out in the Outline FLCP (APP-199)), will provide the space for continued fishing within the Mona Array Area and fishing vessels will also be able to transit through this area. The impacts to fish and shellfish ecology receptors, including queen scallop, for impacts of electromagnetic fields and underwater sound are presented within sections 3.9.3 and 3.9.6 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), informed by current peer-reviewed literature. The area to the east of the Mona Offshore Wind Project is not expected to be subject to disturbance as a result of the Project, and as this area is considered a nursery/spawning area which is unfished, spawning and nursery in this area is expected to be unimpeded by the Project. As shown within Figure 1.2 of Volume 6, Annex 2.1: Benthic subtidal and intertidal ecology technical report (APP-087), broadscale habitat mapping indicates the presence of coarse and mixed substrate beyond the boundaries of the Mona Offshore Wind Project, suggesting that suitable habitat is available within the region adjacent to the Project to support recovery of queen scallop into areas which are subject to temporary habitat loss/disturbance.
REP1-076.17	Further research into the ecosystem and the marine environment that could potentially alter the Queen Scallop habitat is crucial. Across the UK, many wind farms have been constructed on shallow banks that support King Scallop dredging; in these areas, King Scallops are recruited	The Applicant notes these concerns. The area to the east of the Mona Offshore Wind Project is not expected to be subject to disturbance as a result of the Project, and as noted in the response to REP1-076.16 above, this area is considered a nursery/spawning area which is

Reference	Written Representation Comment	Applicant's response
	from other unfished sea beds. The Mona proposal would be unique as it would impact the sandy gravelly grounds where both the spawning and recruitment of Queen Scallops occur.	unfished, therefore spawning and nursery in this area is expected to be unimpeded by the Project. As shown within Figure 1.2 of Volume 6, Annex 2.1: Benthic subtidal and intertidal ecology technical report (APP-087), broadscale habitat mapping indicates the presence of coarse and mixed substrate beyond the boundaries of the Mona Offshore Wind Project, suggesting that suitable habitat is available within the region adjacent to the Project to support recovery of queen scallop into areas which are subject to temporary habitat loss/disturbance. Further, impacts to queen scallop habitat through seabed disturbance and the deposition of suspended sediments are predicted to be short-lived, with disturbed sediments rapidly reintegrated into the existing sediment transport regime and redistributed, with any longer term sediment changes as a result of sedimentation predicted to be highly localised within the immediate vicinity of installed infrastructure (Volume 6, Annex 1.1: Physical processes technical report (APP-086), Volume 2, Chapter 1: Physical processes (APP-053), Volume 2, Chapter 3: Fish and shellfish ecology (APP-055)).
REP1-076.18	On behalf of the SWFPA we appreciate the opportunity to submit this written response and reiterate the SWFPA robustly objects to the application.	The Applicant looks forward to continuing the high level of engagement with the SWFPA undertaken to date so that the issues covered in the Written Representation can be further discussed and resolved.

2.13 SP Energy Networks

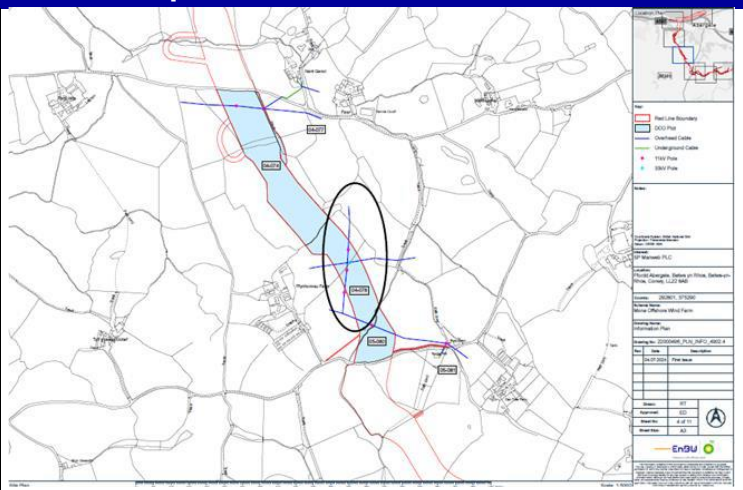
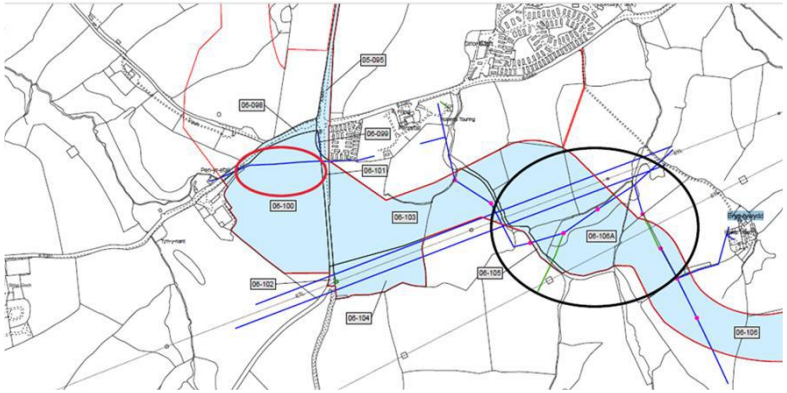
Table 2.13: REP1-077 - SP Energy Networks

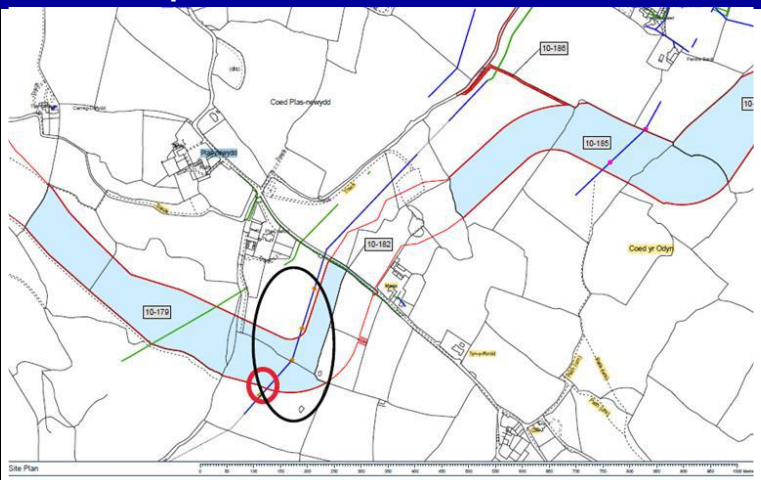
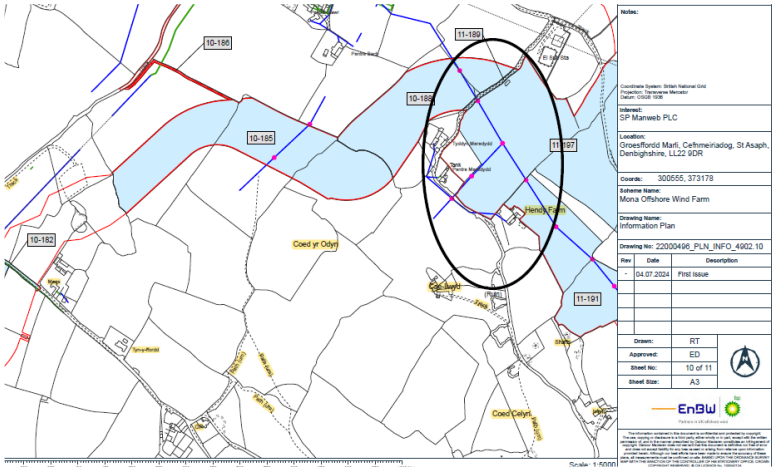
Reference	Written Representation Comment	Applicant's response
REP1-077.1	**Introduction** SP Energy Networks (SPEN) is part of the Scottish Power Group of companies. SPEN operates the electricity distribution networks in the Central Belt and South of Scotland (the asset owner being SP Distribution plc (SPD)) serving 2 million customers and 1.5 million customers in England (in Merseyside, Cheshire and North Shropshire) and North Wales are served by the asset owner SP Manweb plc (SPM)). SPEN also own and maintain the electricity transmission network in Central and South Scotland (SP Transmission plc (SPT)). This response is from SPEN's Planning section which manages all planning and energy consents activities for the three licence areas.	The Applicant notes the response.
REP1-077.2	SPEN is responsible for the operation, maintenance and continuing development of the distribution and transmission networks across our network areas. We have extensive experience of environmental and planning matters in England, Wales and Scotland, and this will continue to be of the upmost importance to our activities as we invest in our networks in order to help deliver Net Zero targets.	The Applicant notes the response.
REP1-077.3	As a regulated networks business, our revenues and outputs are controlled closely within a regulated price control framework by Ofgem. The RIIO-ED2 framework has been operational from April 2023. The current price control period is seeing continuing and significant levels of investment in modernising and strengthening our electricity network to ensure it can continue to meet the current and future demands of consumers and business in the UK. For RIIO-ED2, this equates to a planned of investment in our distribution networks of approx. £3.3bn from 2023 to 2028 to provide electricity users across Britain with a safe, reliable and efficient supply of electricity whilst not being a barrier to progress towards Net Zero targets. It is important that SPEN is able to operate within the price control mechanism during these times	The Applicant notes the response.

Reference	Written Representation Comment	Applicant's response
	without significant or unforeseen change to the overall requirements imposed by the planning system.	
REP1-077.4	It is critical that the planning system recognises the importance of a strong and resilient electricity supply network that will contribute to achieving Net Zero, such as the roll-out of EV charging and the electrification of heating requirements and that electricity networks are a facilitator for decarbonisation. SPEN therefore needs to protect the existing electricity network from uncontrolled development which impacts on the running of this network and results in additional costs to reconfigure the network to avoid such impacts. SPEN has advised the promoter of areas requiring further consideration at the statutory consultation stage in May 2023.	The Applicant notes the response. As requested in SP Manweb's statutory consultation response, the Applicant has worked with SP Manweb to enable it to identify where it's land rights may be affected including providing plans. The Applicant has included Protective Provisions in Part 4 of Schedule 10 of the draft development consent order (C1 F04) to protect SP Manweb's apparatus and ensure that it does not suffer material detriment.
REP1-077.5	Following late notification of the project progressing to the Examination stages, SPEN notified the Planning Inspectorate of its preliminary comments in June 2024. The following builds on these earlier comments. **SPEN observations on the Mona Offshore Wind Farm Project** The main component of the proposed offshore wind farm of interest to SPEN is the proposed onshore cables, in respect of which SPEN has noted in the Environmental Statement Non-Technical Summary (Doc Ref APP-047) the following: *1.8.5.2 A maximum of four cable circuits has been assumed as the maximum design parameter for the environmental assessment. Each cable circuit will consist of three cables, giving a total of up to 12 cables. Once installed, the cables will occupy a permanent easement of approximately 30 m wide, although this width may change where obstacles are encountered. In addition to the above, fibre-optic cables are likely to be required for communications and temperature sensing. This may include up to one communications and one temperature sensing fibre-optic cable per circuit.*	The Applicant notes the response. The Applicant served notice pursuant to section 56 of the Planning Act 2008 on SP Manweb on 26 March 2024 along with the other statutory consultees. The Applicant had engaged with SP Manweb in relation to protection of its apparatus prior to this date and afterwards, making contact directly with its representatives by email. Draft protective provisions were issued to SP Manweb by the Applicant on 31 January 2024 for consideration in advance of the submission of the application and then had further communications on 4 March 2024 to confirm the application had been submitted with further communications thereafter requesting feedback on the Protective Provisions. The Applicant is continuing to engage with SP Manweb to agree Protective Provisions, updates will be provided to the Examining Authority through the Land Rights Tracker (S_PD_5 F04).
REP1-077.6	*1.8.5.3 The Mona Onshore Cable Corridor will route south from the landfall and pass to the west of Abergele. The Mona Onshore Cable Corridor will be approximately 15 km in length and up to 74 m wide (including the temporary construction width). The width of*	

Reference	Written Representation Comment	Applicant's response
	the corridor may increase to 100 m at crossings where trenchless techniques will be used. The cables will be buried underground at a target depth of 1.8 m. This target burial depth may be increased where the route is required to cross beneath existing utilities such as pipelines, land drains, highways or rivers.	
REP1-077.7	Furthermore, reference to the Works Plan (Doc no. AS – 003) shows there to be proposed planting and environmental works under SP Manweb apparatus. The submitted Crossings Schedule (Document APP -083) lists various crossing points and refers to where trench and trenchless crossings are proposed. SPEN acknowledges that the draft DCO (Document AS-010) allows for diversions where necessary within the order limits and the protective provisions in Schedule 2 Part 4 require agreement with SPEN on works within 15m of SPEN assets.	The Works Plan - onshore (AS-003) shows the areas in which landscaping, ecological and environmental work may take place, in particular at the onshore substation site. The undertaker will also have general powers to undertake planting works anywhere within the Order limits. The final details for landscaping and ecology works will be agreed through the final landscape and ecology management plan which will be submitted to and approved by the relevant planning authority in accordance with requirements 8 and 12 of the draft development consent order (C1 F04). The final landscape and ecology management plan will reflect the detailed design of the onshore works and any necessary considerations for statutory undertaker apparatus. The Onshore Crossing Schedule (F5.4.3 F01_F02) identifies obstacles to be crossed, including identified SP Manweb assets, and notes how these are proposed to be crossed. There is also an indication of whether those crossings will be trenched, trenchless or retain flexibility to cross with either technique and detailed design to be undertaken closer to the time of construction. The Order limits include appropriate flexibility to allow for micro-siting of the onshore cable installation and to ensure that SP Manweb's apparatus is appropriately accounted for. Further to this, the DCO allows for removal and reinstatement of SPEN assets if required. The Protective Provisions included in Part 4 of Schedule 10 of the draft development consent order (C1 F04) provide SP Manweb with adequate protections in relation to works within the vicinity of the SP Manweb apparatus. Paragraph 7 of the Protective Provisions already provides that detailed plans for these works must be submitted to and approved by SP Manweb prior to relevant works commencing. This approval may be made subject to reasonable conditions for the protection of SP Manweb apparatus including the removal and relocation of apparatus if required.
REP1-077.8	Following its review of the DCO documents, SPEN has identified a need for the promoter to address the following: - Clearly show where impacts on the SPEN network arise for both parties to manage these impacts in an agreed manner through	The Applicant believes that both points can be adequately addressed in the Protective Provisions. See REP1-077.7 regarding Paragraph 7 of the Protective Provisions. Further, there is already a requirement contained in paragraph 7(13) of the Protective Provisions for the undertaker to comply with statutory

Reference	Written Representation Comment	Applicant's response
	appropriate controls in the DCO such as protective provisions and requirements; and - ensure the agreed measures are made clear to contractors working on site through required control measure documents such as method statements	requirements and guidelines for development near overhead lines EN43-8 and HSE's guidance note 6 "Avoidance of Danger from Overhead Lines" in relation to any apparatus and aligning with SP Manweb guidelines. This is a standard approach for utility asset owners and is sufficient for SP Manweb's assets to be protected.
REP1-077.9	SPEN also has land rights in place for these assets and where existing land rights are interfered with by new rights, these must retain SPEN's existing rights as to not in any way disadvantage SPEN from keeping installed its required apparatus.	Paragraph 4 of the Protective Provisions provides that the Applicant may not appropriate or acquire or take temporary possession of any land interest of SP Manweb or appropriate, acquire, extinguish, interfere with or override any easement or other interest or right and/or apparatus of SP Manweb otherwise than by agreement.
REP1-077.10	**Impacts on SPEN network and measures to control these in the DCO** SPEN has engaged with the promoter to support them in preparing a suitable plan showing its affected assets in more detail. SPEN provided the promoter with the relevant network GIS files in June 2024 and is now in receipt of a better crossover plan (Dwg no. 22000496_PLN_INFO_4902.11). SPEN has suggested to the promoter that this plan be submitted to the Examination. SPEN has identified the key crossover points circled black in the below plans as follows:	The Applicant notes the response.
REP1-077.11	<u>Ffynhonnau Farm</u> At this location there are two overhead circuits and supports which limit cable installation options.	The Applicant notes the location of the apparatus on the plan. This area is identified in the Environmental Statement Volume 5, Annex 4.3: Onshore Crossing Schedule (REP1-007) and lists the proposed crossing technique (Mapping ID 59 and 60).

Reference	Written Representation Comment	Applicant's response
		
REP1-077.12	Bryn-tywydd At this location, there are 11kV poles the movement of which is restricted by the 132kV overhead line (the red circled area highlights poles not shown). 	The Applicant notes the location of the apparatus on the plan. This area is identified in the Environmental Statement Volume 5, Annex 4.3: Onshore Crossing Schedule (REP1-007) and lists the proposed crossing technique (Mapping ID 87).
REP1-077.13	Plas-newydd At this location, the 132kV circuit is a double wood pole line from a customer wind farm to St Asaph Grid Substation	The Applicant notes the location of the apparatus on the plan. This area is identified in the Environmental Statement Volume 5, Annex 4.3: Onshore Crossing Schedule (REP1-007) and lists the proposed crossing technique (Mapping ID 231).

Reference	Written Representation Comment	Applicant's response
		
REP1-077.14	Hendy Farm At this location, there are a number of wood poles to avoid and in addition, the area leading into the substation is a proposed landscaping area, the design of which needs to be considered in detail as some planting is not compatible with the SP Manweb apparatus. 	The Applicant notes the location of the apparatus on the plan. This area is identified in the Environmental Statement Volume 5, Annex 4.3: Onshore Crossing Schedule (REP1-007) and lists the proposed crossing technique (Mapping ID 254).

Reference	Written Representation Comment	Applicant's response
REP1-077.15	**SPEN Changes** SPEN considers that the Crossing Schedule document does not show the affected SPEN assets in sufficient detail to identify likely impacts and therefore doubts that the proposed technology is correct. For example, the Ffynhonnau crossing shows a combination of trenching, trenchless or either. SPEN requires the onshore crossing schedule document to be amended to include details of the SPEN assets as available in the new crossover plan and the outcome of a review of the crossing techniques for these assets shown in the revised crossing schedule document submitted to the Examination.	The 'Ffynhonnau crossing' is referred to above in REP1-077.11. For clarity, the Applicant has listed the crossing technique at this location as 'trenching. 'The detailed design of each individual crossing has not yet been undertaken but when undertaken will account for any statutory undertaker apparatus as required. This approach is the standard approach for development consent orders and SP Manweb apparatus will be sufficiently protected through the application of the Protective Provisions.
REP1-077.16	SPEN notes the protective provisions largely cover matters as required, however, there are minor changes, for example in terms of some technical references, which need to be made. SPEN intends to discuss these with the applicant and changes incorporated into the next updated draft DCO at Deadline 2.	The Applicant notes the response and awaits the requested changes to the Protective Provisions to be provided by SP Manweb.
REP1-077.17	1. As SPEN understands that further technical details are yet to be developed, and noting the reference to the target burial depth which is critical to SPEN ensuring impacts on its networks are avoided, SPEN considers it necessary to be included in further issues of information relating to the trenchless technologies and considers this justifies being consulted on this information. SPEN therefore requires Requirement 6 included in the draft DCO to be amended as highlighted in red below as follows: *Detailed design parameters onshore* *6.—(1) The onshore works must not exceed the parameters assessed in the environmental* *statement and set out in sub-paragraphs (2) and (3).* *(2) The maximum number of transition joint bays must not exceed four.* *(3) In relation to Work No. 22a—* *(a) the highest part of any building must not exceed 15 metres above finished ground level;*	As stated above, the Protective Provisions offer suitable protection for SP Manweb apparatus and no additional changes to the draft development consent order requirements are necessary.

Reference	Written Representation Comment	Applicant's response
	(b) the highest part of any external electrical equipment, excluding lightning rods, must not *exceed 12.5 metres above finished ground level;* *(c) the total area of the fenced compound (excluding its accesses) must not exceed 65,000* *m2; and* *(d) the total number of lightning rods within the fenced compound area must not exceed 12* *and the height of any lightning rod must not exceed 30 metres above finished ground* *level.* *(4) Trenchless installation techniques must be used to install the cable ducts and electrical* *circuits where identified in the onshore crossing schedule for the purpose of passing under a* *relevant obstruction unless otherwise agreed by the relevant planning authority, following* *consultation with the highway authority and SP Energy Networks.* In relation to the proposed landscaping under SPEN assets, SPEN requires to be consulted on the further detail and suggests Requirement 7 is amended as follows: Provision of landscaping 7.—(1) Work No. 22 must not be commenced until a landscape plan and associated work programme has been submitted to and approved by the relevant planning authority following consultation with NRW and SP Energy Networks as appropriate. (2) The landscape plan must accord with the outline landscape and ecology management plan and must include details of all proposed hard and soft landscaping works including— (a) location, number, species, size and planting density of any proposed planting including any trees; and (b) implementation timetables for all landscaping works.	

Reference	Written Representation Comment	Applicant's response
	(3) The landscape plan must be implemented as approved.	
REP1-077.18	**Ensure the agreed measures are made clear to contractors working on site through required method statements** SPEN has advised the promoter that measures in the draft PPs will also need to be outlined in the relevant method statements. SPEN has advised that the draft CoCP should include specific reference to the required standard measures to divert and working closely around affected network. To ensure this is the case, SPEN considers it necessary to consulted on the detailed CoCP and as such requires Requirement 9 to be amended as highlighted in red as follows: *Code of construction practice* *9.—(1) No stage of the onshore works may commence until for that stage a code of construction* *practice has been submitted to and approved by the relevant planning authority following* *consultation with NRW and the relevant highways authority as appropriate, and where relevant to the Construction Method Statement, SP Energy Networks.* *(2) The code of construction practice must accord with the outline code of construction practice* *and include, as appropriate to the relevant stage—* *(a) spillage and emergency response plan;* *(b) dust management plan;* *(c) construction noise and vibration management plan;* *(d) construction traffic management plan;* *(e) highways access management plan;* *(f) communications plan;* *(g) construction fencing plan;* *(h) construction surface water and drainage management plan;* *(i) flood management plan;* *(j) public rights of way management strategy;*	

Reference	Written Representation Comment	Applicant's response
	(k) soil management plan; *(l) site waste management plan;* *(m) artificial light emissions plan;* *(n) biosecurity protocol;* *(o) discovery strategy for contaminated land;* *(p) arboriculture method statement;* *(q) onshore construction method statement; and* *(r) landfall construction method statement.* *(3) Each code of construction practice must be implemented as approved.*	
REP1-077.19	**Ensure existing land rights are protected** SPEN is continuing to review the many crossing points and cross reference these in the Book of Reference and expects to be discussing these land interests with the applicant soon. Given this ongoing position, SPEN requests a holding position on its intentions to attend the Compulsory Acquisition Hearing.	The Applicant notes the response and looks forward to further discussions.

2.14 Stena Line

Table 2.14- REP1-079 - Stena Line

REP1-078 and REP1-079 Reference	Written Representation Comment	Applicant's response
REP1-079.1	1. EXECUTIVE SUMMARY 1.1 This document constitutes Stena Line's response to the Planning Environmental Information Reports ("PEIRs") for the Mona Offshore Wind Project (the "Project"). 1.2 Attachments have been added to this submission as supporting annexes and should be considered part of it. 1.3 Stena Line is submitting this response alongside its responses to the PEIRs for the Morgan Offshore Wind Project Generation Assets and Morecambe Offshore Windfarm Generation Assets. Given that the consultations have to a great extent been conducted jointly between the Mona, Morgan and Morecambe Projects (collectively, the "Wind Farms") and that Stena Line's main concerns apply equally to all PEIRs, there will be a level of duplication across Stena Line's responses. However, each response is Project specific and highlights Stena Line's concerns regarding the impact on Stena Line's operations arising from that Project. 1.4 Stena Line's main concern throughout the consultation period has been and still is the risks to navigational safety for its vessels, as well as other vessels operating in the array areas of the Wind Farms. The focus Stena Line's response has therefore been on the Shipping and Navigation Chapters of the PEIRs. Additional comments are made in respect of onshore impact arising from the cumulative effects of the Wind Farms. 1.5 Terms used (a) "COLREGs" means the IMO Collision Regulations as currently in force. (b) "Project Consortia" means collectively the Project Consortia for the Mona, Morgan and Morecambe Wind Farms, namely EnBW / BP and Cobra / Flotation Energy. (c) "MGN 654" means Marine Guidance Note 654. (d) "Mona" or the "Project" means the Mona Offshore Wind Project. (e) "NRA" means the Navigation Risk Assessment contained in Volume 6, Annex 12.1 of the Mona PEIR and prepared by EnBW / BP. (f) "PEIR" means Planning Environmental Information Report and generally refers to the PEIRs submitted by the Project Consortia in respect of the Mona, Morgan and Morecambe Wind Farms.	The Applicant notes that the Written Representation submitted by Stena Line at Deadline 1 is identical to the S42 comments submitted by Stena Line in 1 Jun 2023x to the Preliminary Environmental Information Report (PEIR). The Applicant has therefore not responded to each point made, as its responses are set out in the Consultation Report Appendices – Part 3 (D25-F) (APP-040), specifically in D25.13 and unique identifiers Mon_072_002_010623 through Mon_083_001_040623. The Applicant notes that, as illustrated in the sections below, in developing the final shipping and navigation assessment it gave careful consideration to the S42 comments submitted by Stena Line to the PEIR. The NRA and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and responses to the S42 statutory consultation, the Mona Offshore Wind Project has modified the

REP1-078 and REP1-079 Reference	Written Representation Comment	Applicant's response
	(g) "Wind Farms" means collectively the Mona, Morgan and Morecambe Wind Farms proposed to be constructed in the Irish Sea. 2. INTRODUCTION 2.1 History of Stena Line Stena Line was founded in Gothenburg, Sweden in 1962. Stena Line is one of the world's largest ferry operators with over 26,000 yearly sailings on routes across Scandinavia and the Baltic, Irish and North Seas. 2.2 Core values Stena Line is a family-owned company and its core value is care; care for customers, care for resources and care for each other. Stena Line aims to offer affordable and seamless ferry transportation for all customers and has a commitment to safety, reliability and reducing its environmental footprint. In 2022 over 63 percent of trips ran according to the timetable and Stena Line aims to increase punctuality to a minimum of 67 percent, this will in turn result in lower CO2 emissions as the need to accelerate and use additional fuel to catch up with scheduled arrival times will decrease. 2.3 Employment Stena Line employs over 5,900 employees from nearly 40 countries, with headquarters located in Gothenburg, Sweden. Stena Line's fleet contains 39 vessels which operate on 18 ferry routes between 10 countries, helping 7 million people reach their destination annually. In 2022 Stena Line had a SEK 17.6 billion annual turnover, which allows Stena Line to invest in more than 300 implemented energy saving projects. In the UK, Stena Line's onshore operations employs around 745 people, and a further 1,193 people are employed onboard the vessels that operate on routes around the UK. Stena Line's Liverpool to Belfast and Heysham to Belfast routes are the key routes affected by the Mona / Morgan / Morecambe Projects and 400 people are employed across these routes. Stena Line's total employees across the Liverpool to Belfast route totals 313. In respect of onshore operations, 90 people are employed by Stena Line at the Birkenhead Port, with a further 72 employed at Belfast Port. In terms of onboard personnel operating the route, 81 people are employed to work onboard the Stena Edda, including 57 international crew assigned to the vessel and 70 people are employed to work onboard the Stena Embla, including 58 international crew. In relation to the Heysham to Belfast route, a further 14 people are employed in onshore operations at Heysham Port. 39 people are employed to work onboard Stena Hibernia and another 39 are employed to work onboard Stena Scotia. Accordingly, Stena Line have a duty to protect the health, safety, welfare and job security of their considerable work force, which they take very seriously. 2.4 Infrastructure and vessel particulars	boundaries of the Mona Array Area which has increased the available searoom to minimise the impacts to ferries, and has reduced the deviations required (as set out in sections 7.9 and 7.11 of Volume 2, Chapter 7: Shipping and navigation (APP-059) and in section 4.11.2 of Volume 1, Chapter 4: Site selection and consideration of alternatives (APP-051)). The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also amended the boundaries of their respective projects to increase searoom and reduce the cumulative impacts on ferries and other vessels. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and an NRA hazard workshop (as described in Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) and Appendices F and I of the Technical Engagement Plan Appendices - Part 2 (F to M) (APP-043)). In addition to these boundary amendments, commitments to control measures (specifically the development and adherence to an Aids to Navigation Management Plan, a Design Plan, an Offshore Environmental Management Plan that includes a Fisheries Liaison and Co-existence Plan, an Offshore Construction Method Statement, which

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	The routes that Stena Line will address in this PEIR response operate from Liverpool, Heysham and Belfast. The Stena Line Liverpool terminal is located at 12 Quays Terminal in Birkenhead, the Stena Line Heysham terminal is located at the North Quay, Heysham and the Stena Line Belfast terminal is located at Victoria Terminal 2, Belfast. A number of vessels operate the routes between Liverpool and Belfast and Heysham and Belfast. Stena Edda, Stena Embla and Stena Foreteller sail between Liverpool and Belfast and Stena Hibernia and Stena Scotia sail between Heysham and Belfast. The passenger vessels operating between Liverpool and Belfast, Stena Edda and Stena Embla, are part of Stena Line's new E-Flexer class of vessel, which are optimised for efficiency and flexibility and are some of the most advanced and energy efficient vessels in operation. Stena Edda's particulars are: gross tonnage 40,500; year of build 2019. Stena Embla's particulars are: gross tonnage 40,500; year of build 2020. In terms of their capacity, each vessel can carry a maximum of 927 passengers, 120 vehicles and have a freight capacity of 3,100 lane metres. In terms of fuel consumption and costs, based on the current passage time of 8 hours, distance of the route of 142 nautical miles and fuel prices for March 2023, each trip for Stena Edda and Stena Embla averages over US$13,000. The Roll On Roll Off (Ro-Ro) Cargo Ship Stena Foreteller services Stena Line's freight operations on the route between Liverpool and Belfast. Stena Foreteller's particulars are: gross tonnage 24688; year of build 2001. The freight capacity of Stena Foreteller is 3000 lane metres. Using the same passage information as above for the Liverpool and Belfast route, the total cost of each trip for Stena Foreteller is estimated to be around US$10,710. Stena Hibernia and Stena Scotia are the Ro-Ro Cargo Ships transporting freight between Heysham and Belfast. Stena Hibernia's particulars are: gross tonnage 13,017; year of build 1996. Stena Scotia's particulars are: gross tonnage 13,000; year of build 1996. Freight capacity of the Stena Hibernia is 1,710 metres and the Stena Scotia is 1,692 metres. Based on a calculation of the current passage time of 8 hours, distance of 123 nautical miles and fuel prices for March 2023, the total cost per trip for Stena Hibernia and Stena Scotia is averaged at US$6,555. Fuel is one of the major operating costs for all merchant vessels, and the Stena Line vessels are no exception. This cost item has been brought into sharper focus in recent years as fuel prices have rocketed over the past two decades (seeing only brief periods of decline linked to recession) and there has, understandably, been more attention on environmental protection. As elaborated on further below, even the slightest increase to a vessel's regular transit route can exponentially affect this operating expense annually. In Stena Line's case and for the PEIR under consideration, they have a total of 5 vessels potentially impacted. 2.5 Lifeline service	includes a Cable Specification and Installation Plan, a Vessel Traffic Management Plan, an Emergency Response and Cooperation Plan and use of notice to mariners) set out in section 7.8 of Volume 2, Chapter 7: Shipping and navigation (APP-059). These measures are all secured within the deemed marine licence in Schedule 14 of the draft DCO and expected to be secured within the standalone NRW marine licence. Noting that a residual risk over the baseline remains, the NRA Hazard Workshop concluded that all hazards, previously identified as unacceptable at PEIR, had been reduced to As Low As Reasonably Practicable (ALARP).The Applicant also notes that in Issue Specific Hearing 2 in response to Examining Authority questions, Stena Line confirmed that impacts had been reduced to ALARP (Point (52) in Issue Specific Hearing 2 Summaries (REP1-010)) The Applicant understands that the Stena Line Ltd Belfast to Liverpool service intersects with the Mona Array Area. For this service a revised passage plan was developed during the navigation simulations held with Stena Line 23 to 25 May 2023, that would necessitate an additional 3.4 minutes of steaming time per trip to accommodate the Mona Offshore Wind Project alone. Cumulatively with other projects, plans and activities (the Morgan Offshore Wind

REP1-078 and REP1-079 Reference	Written Representation Comment	Applicant's response
	Stena Line is the only ferry operator to operate a direct passenger and RoRo freight route between Liverpool and Belfast. In doing so, Stena Line ensures essential passenger and freight traffic can serve as a link between the respective locations and is able to contribute to the local community and bolster employment in the region. Were Stena Line's operations to be curtailed on this route, there would be no ferry route alternatives, in turn affecting both freight and passenger traffic. This would significantly impact the infrastructure, trading and employment at each location. 3. ROUTES 3.1 Liverpool and Belfast Stena Line operates 38 weekly sailings directly between Liverpool and Belfast on a twenty four hour schedule. The crossing time is approximately 8 hours. The Passenger Ro-Ros Stena Edda and Stena Embla operate the route along with the Freight Ro-Ro Stena Foreteller. The new E-Flexer class vessels Stena Edda and Stena Embla, which were introduced in 2021, include several emission-reducing technologies such as a streamlined hull, new propellers and two engines instead of four. As well as reducing emissions, the new ferries have also increased passenger and freight capacity on the route by a third. Significant investment in Stena Line's Irish Sea operations reflect Stena Line's commitment to the region - Stena Line has recently signed a new deal with Peel Ports to operate their 12 Quays port and ferry terminal in Birkenhead for another 77 years until 2100. Stena Line has since made further investments to the region with a recent purchase of two sites next to the terminal which will offer additional storage for its freight customers as business is expanded there. 3.2 Heysham and Belfast The Stena Hibernia and Stena Scotia perform a dedicated freight service with 22 weekly crossings between Belfast and Heysham, the crossing time is approximately 8 hours. Stena Line recently announced a multi-million pound investment to introduce another two freight ferries to the route in 2025, replacing the older vessels Stena Hibernia and Stena Scotia. The new vessels are set to increase freight capacity on the route by 80%, which will allow Stena Line to keep up with increased customer demand. In line with Stena Line's sustainability targets to reduce its CO2 emissions by 30% by 2030, the NewMax vessels will be designed to run on methanol and will feature technology to operate on both battery propulsion and shore power where available.1 4. INITIATIVES Stena Line has been spearheading sustainable practice for many years. In 2015, Stena Line converted the Stena Germanica to run on both diesel and methanol, making it the world's first Roll-on Passenger (RoPax) vessel to do so.2 Since then, Stena Line has developed the new E-Flexer class vessels and the NewMax vessels. 5. GREEN ENERGY	Project: Generation Assets and the Morecambe Offshore Windfarm: Generation Assets), this service would necessitate an additional 3.9/6.8 minutes of steaming time per trip depending on direction. On an eight hour service, with greater existing operational variation in transit duration and turn around time, the deviation is not anticipated to result in significant operational impacts for Stena Line from the Mona Offshore Wind Project alone. Cumulatively with other projects, plans and activities, this impact is assessed as being of moderate adverse significance in Volume 2, Chapter 7: Shipping and navigation (APP-059). The Applicant is engaging with Stena Line Ltd on the residual impacts and will continue to engage through the examination phase of the Mona Offshore Wind Project.

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	Stena Line supports the development of renewable energy in order to phase out reliance on fossil fuels and ensure the UK can align with the emission reduction targets set by the Paris Agreement. Our sister company, Stena Renewable Energy AB is a terrestrial windfarm developer in Sweden with over 201 wind turbines in operation and another 200 under design or construction spread across 14 windfarm sites. Stena very much promotes the generation of green energy and strives to ensure that the sites selected for their development are always carefully assessed for local impact. Stena Line has set a target to reduce CO2 emissions from its vessels by 30% by 2030. At present, 100% renewable electricity is used in Stena Line's shore operation (by purchasing green credits for three of its ports) and about 20% of all Stena Line terminals offer shore power connections to Stena Line vessels. Stena Line is also investing in new green technologies including battery power, quayside powerbanks for charging electric ferries, alternative fuels (including methanol), utilising artificial intelligence in route planning and efficient ship designs. The construction of the Wind Farms poses a concern to Stena Line's sustainability strategy insofar as Stena Line's vessels will be forced to deviate and take longer routes to safely transit around the Wind Farms' footprint. As noted above, this is in turn will increase fuel consumption and consequently greenhouse gas emissions. In addition, the impact on Stena Line's route operations may make it more difficult to ensure compliance with international and regional emissions regulations (including the IMO's Energy Efficiency Existing Ship Index and Carbon Intensity Indicator regulations and the EU Emissions Trading System). Accordingly, the Wind Farms' green energy credentials need to be assessed in the round, and according to the impact it will have on Stena Line's, and numerous other stakeholders', own sustainability strategies. 6. HISTORY OF THE PROPOSAL 6.1 Stena Line's perspective on history of proposals and involvement to date Stena Line has been partaking as a stakeholder since Q2 of 2021 and have liaised with Nash Maritime who represent Project Consortia. Stena Line participated in Marine Navigation Engagement Forums (MNEFs) throughout 2022. After requests from Stena Line and other affected ferry operators (namely Isle of Man Steam Packet and Seatruck), Stena Line were also invited to carry out simulation exercises in August 2022. The Marine and Coastguard Agency also attended these simulation exercises. In October 2022, Stena Line attended a two-day HAZID Workshop in Liverpool aimed at assessing various hazards identified in the simulation exercises.	

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	In May 2023, further Navigation simulation exercises were carried out with Stena Line to assess the Project Consortia's proposed mitigations to the Navigation safety concerns identified at the previous simulations. These mitigations were in the form of a widening of the channels between the Windfarms and other offshore infrastructure. The joint HAZID Workshops resulting from this are still to take place to quantify their effectiveness. Due to this and the proximity in time between the simulations and the deadline for submitting the PEIR response, Stena Line's observations and comments regarding Navigational Safety are generally limited to the project boundaries as submitted in the PEIRs. Stena Line's position is that although the forums and workshops have been helpful in identifying hazards and issues with the project footprint, two key issues should be noted from the PEIR and during the MNEFs to date: (1) The cumulative impact of Orsted's Isle of Man Offshore Wind Farm Project (the "Orsted Project"); (2) Some delay in circulating the agreed revised reduction of the Project footprint and widening of the navigation corridor. Stena Line understands from meetings with Orsted that they expect to submit their scoping report for the Isle of Man Offshore Wind Farm to the Isle of Man Government by Q4 2023. While technically still a Tier 3 project, Orsted have indicated their intentions to Stena line and have engaged with the Project Consortia on 20 October 2022. Despite this, to Stena Line's knowledge the Project Consortia have not considered the impact of the Isle of Man Offshore Wind Farm on ferry operations from a Navigation Risk Assessment perspective. Stena Line has specifically requested that the Project Consortia include the Orsted project in the latest Navigation simulations held in May 2023. Despite this the Orsted Project has still not been included and Stena Line must therefore regard the NRA process as being incomplete due to the failure to assess an adjacent transboundary development. Stena Line strongly requests that there be open dialogue and cooperation between the Project Consortia and Orsted both in attending MNEFs and navigational risk assessments to ensure the cumulative effect on Stena Line and other ferry operators of the proposed wind farm projects are properly considered. Revised footprints of the Projects were agreed by the Project Consortia in January 2023. However the revised boundaries and navigation corridor are not assessed in the PEIR but listed as 'next steps'. No adequate explanation for this approach is provided. Stena Line strongly encourages the Project Consortia to adopt the revisions and proceed with further assessments on this basis. Stena Line's Liverpool to Belfast route is significantly affected by the proposed footprint of the Wind Farms. Stena Line has throughout the consultation period highlighted and requested proper assessment of the impacts of the Wind Farms on ferry routes and in particular the need for a	

REP1-078 and REP1-079 Reference	Written Representation Comment	Applicant's response
	cumulative assessment. Stena Line's primary concern is that of safety and how its' affected vessels will be able to navigate the affected areas safely, especially in adverse weather conditions. 7. CONSULTATION DOCUMENTS 7.1 Stena Line's perspective on the consultation documents The PEIR and in particular the NRA states that the assessment has been prepared in accordance with Marine Guidance Note 654 concerning safety of navigation and emergency response caused by Offshore Renewable Energy Installations (OREI) ("MGN 654"). MGN 654 which requires "stakeholder engagement to ensure that solutions are sought that allow offshore wind farms and navigation uses of the sea to successfully co- exist". On this basis, Stena Line's position is that navigational risk assessments and consultations should be carried out on the impact of all regularly used routes that traverse the Array Areas. Stena Line notes that Chapter 12, section 12.8.2 of the Mona PEIR asserts that the only routes that are required to be assessed are "recognised sea lanes" within the meaning of UNCLOS Article 60, which, they say, is restricted to the defined traffic separation schemes. However, this interpretation contrasts with the National Policy Statement for Renewable Energy Infrastructure ("NPS EN-3"), which in section 3.8.346 clearly states that the Secretary of State will, when considering the Project site selection, consider particularly the need to avoid or minimise disruption or economic loss to shipping and navigation in "approaches to ports and to strategic routes essential to regional, national and international trade, lifeline ferries and recreational users of the sea". Clearly, the restrictive interpretation adopted in the PEIR is not conducive to finding solutions and not within the ambit of MGN 654. Accordingly, Stena Line firmly disagrees with the interpretation adopted in the PEIR. Stena Line (and the other affected ferry operators) operate on established routes which must be considered as recognised sea lanes. Stena Line therefore stresses that MGN 654 needs to be considered in full and that all affected commercial routes should form part of the navigational risk assessments. Stena Line further stresses that the Project Consortia need to continue with the process of risk mitigation in collaboration with all stakeholders as is identified in the forthcoming second round Hazard ID Workshop to ensure that navigational risks to current operations are reduced to ALARP levels. It should be further stressed that Stena Line will carry the risk once the Wind Farms are constructed and therefore Stena Line reserves the right to determine the level of risk which is acceptable. Stena Line appreciates that Ship Simulation exercises have been carried out but contends that while an exercise can be safely conducted in a simulator on a single transit that the exposure to risk is greatly increased by the frequency at which a vessel transits the area noting that Stena's vessels transited the area 2,997 times in 2019. Over the 35-year life of the Project that is nearly 105,000 transits.	

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	8. PROPOSAL FOOTPRINT 8.1 Deviation necessary (a) Chapter 12, section 12.8.3.5 of the Mona PEIR assesses the impact on Stena Line's routes as follows: "The Stena route between Liverpool and Belfast to the west of the Isle of Man with approximately 1,400 movements per year directly intersects the Mona Array Area. A revised passage plan was developed that passes to the east of the Mona Array Area, avoiding congestion within the TSS. Vessels would depart Liverpool as they currently do before heading more north northwest than at present, passing 1.5nm from the Hamilton North Gas Field and single buoy mooring, before turning to port 1.5nm from the northeast boundary of Mona in order to clear Chicken Rock on the Isle of Man at their existing waypoint. This would necessitate an additional 2.6nm/7.4 minutes of steaming time per trip." (b) Considering Figure 12.5 of the Mona PEIR Chapter 12, it is clear Stena Line's routes are significantly affected by the Mona Array Area, in particular due to the routes required during adverse weather conditions. The PEIR estimates the deviation to be 2.6nm/7.4 minutes for the Liverpool-Belfast route per vessel per trip (See Mona PEIR, Chapter 12, section 12.8.3.5.). The deviation is significant for Stena Line's operations which rely on just in time arrival. Just as an example, an additional 2.6nm crossing distance for three vessels twice daily over the 35-year lifespan of the Project is almost 200,000nm in total (before any further deviation created by the Orsted project is taken into account). At current fuel prices, this additional mileage over the lifespan equates to US$500,000 per annum, or a total of US$17,300,000. On any view, this is a staggering addition to Stena Line's operating costs. (c) The necessary deviation must also be considered alongside the need for adverse weather routeing (discussed below). The Navigation Risk Assessment published in the PEIR (NRA, section 1.8.3.20) concludes that, for ferry vessel routing, "in adverse weather, the reduced sea room and increased duration would necessitate additional operational constraints and potential cancellations to these services" (see NRA, section 1.8.3.20). The cumulative impact of the necessary deviation that increases sailing time and adverse weather routeing therefore has a significant impact on Stena Line's operations far beyond the estimated 2.6nm/7.4 minutes per vessel per trip. (d) Stena Line must consider the impact of the Wind Farms' footprint on its operations during the construction phase, the years of operation and during decommissioning. Stena Line expects the construction phase to be particularly disruptive to its voyages and the need to deviate will lead to delays. The Project Consortia have estimated construction time to be 4 years for Mona, 2.5 years for Morecambe and 4 years for Morgan. Should the construction phase take longer than estimated, Stena Line needs to factor this into its planned operations. Further, it is not clear to Stena Line what the	

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	Marine Operating Guidelines will include in relation to risks and necessary deviation during construction of the Wind Farms. The adverse impacts on ferry routeing are highlighted in the Mona PEIR, Chapter 12, section 12.8.3.3: "During construction, vessel traffic would be displaced from the Mona Array Area due to the presence of construction buoyage and safety zones around fixed structures which are under construction. …"…. "For regular runners such as ferries, this has the potential to result in a significant increase in costs or make schedules unviable. Furthermore, impacts on routeing may result in increased risks of collision or allision…Increased transit distance necessitates an increase in fuel burn which has a direct additional cost to operators. Furthermore, this would increase the environmental impact of their operations through increased emissions." (See NRA, section 1.8.3.1) (e) The footprint of the Mona Array Area and the consequential deviation that Stena Line's vessels will need to undertake causes serious concerns primarily for the safety of crew and passengers. Not only is the increased risk of collision or allision highly concerning (and discussed further below), but increased transit times may affect the crew's hours of rest and could risk contravening the Maritime Labour Convention's minimum hours of rest. The PEIR (at Chapter 12, section 1.8.3.1) acknowledges that "increased transit duration could make compliance with the convention impossible without compromising schedules or hiring additional crew." This in turn would have a further financial impact on Stena Line's operations. (f) Another concern that Stena Line have is the potential environmental impact caused by increased emissions from the additional transit distance and resulting fuel consumption. This may also adversely affect Stena Line's ability to comply with regional and international maritime emissions regulations, including the IMO's CII regulations. 8.2 Navigational safety Overview (a) At the outset, Stena Line underlines and emphasises that the Navigational Risk Assessment (NRA) published in the PEIR (see NRA, section 1.9.8 and 1.11.3) concludes that Mona creates hazards with unacceptable risks to navigational safety and fail requirements in both NPS EN-3 2.6.165 and MGN 654 Annex 1. (b) While risk control options are discussed, the PEIRs acknowledge that these are conceptual at this stage and have not been implemented. In any event, Stena Line does not agree that the conceptual risk controls are appropriate or likely to be effective. Notably, a number of the risk controls proposed would only mitigate the effects of an incident, rather than preventing it occurring in the first place. As such, they cannot properly be categorised as risk controls.	

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	(c) Fundamentally, Stena Line, as a ferry operator in the region responsible for the safety of its crew and passengers, owing a duty of care to others and being responsible for stewardship of the environment, cannot accept the risks and failures to navigational safety set out in the NRAs and is concerned that proposed measures and risk control options will not be sufficient. Data sets used and methodology (d) Stena Line acknowledges the NRAs that have already been conducted, including the Cumulative Regional Navigational Risk Assessment (CRNRA) undertaken collaboratively for the Mona, Morgan and Morecambe Offshore Wind Projects. (e) Stena Line's major concern throughout the consultation process has been that of navigational safety and Stena Line's primary obligations to ensure the safety of their employees, crew and passengers which may number up to 1000 persons on summer sailings along with the protection of the environment, which is the motivation for this concern. (f) While Stena Line recognises the impact the COVID-19 pandemic may have had on recreational and commercial vessel movements, the omission of data sets from 2020-2022 means the PEIR relies on outdated information and importantly does not reflect the surge in ferry traffic post-pandemic. Stena Line therefore queries the assertion that "vessel traffic is expected to have largely returned to pre-pandemic levels" on the basis that traffic may well have increased beyond pre-pandemic levels (see Mona PEIR Chapter 12, section 12.4.1.2, Morecambe PEIR Chapter 14, section 14.100). In fact, Stena Line has obtained data contesting such findings, including port call figures for cruise ships that show an increase of calls to the Ports of Liverpool and Belfast in 2022 and projected for 2023. (g) The vessel density and number of vessels of different types that would cross the Project footprints is difficult to determine. This is acknowledged in section 12.4.4.18 of the Mona PEIR in relation to the density of smaller boats: "However, small boats operating inshore may not carry AIS and therefore the actual numbers could be underrepresented". From Stena Line's experience of operating in this region they agree that actual numbers are most likely significantly underrepresented. (h) Further, the NRA acknowledges that passenger numbers are increasing (section 1.7.3.4) and that Ro-Ro freight is increasing generally (Figure 1.39). This is certainly Stena Line's experience, with passenger volumes growing year on year, complimented by the increased buoyancy in the economy of Ireland. As noted above, Stena Line are investing and responding to this by purchasing larger tonnage to increase their capacity. (i) It is of concern that whilst adverse weather has been considered, this has been confined to wind, wave, and tidal conditions. No consideration appears to have been given to navigating in conditions of restricted visibility.	

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	(j) More generally, Stena Line are concerned that the Wind Farms have confined their analysis of historical data to the UK region. Given the global development of offshore wind farms, much of which pre-dates developments in and around the UK (particularly in the rest of Europe), Stena Line considers it would have been more appropriate to consider global (or, at least Europe wide) statistics. Assessment of incident risks (k) Crucially, the NRA (see NRA, section 1.9.6.5), concludes that the possibility of a collision between ferry/passenger vessels and another such vessel or a cargo/tanker vessel is a high risk and unacceptable hazard. Such risks directly impact Stena Line as a passenger ferry operator and cannot be accepted. (l) The magnitude/likelihood of impact used in the Mona PEIR applies a very broad range between what is rated 'Medium' (reasonably probable that hazard may occur / 50%) and what is rated 'Low' (unlikely to impact Projects, but has occurred elsewhere / 10%). No other 'middle ground' ratings are contemplated between 'Medium' and 'Low' in the PEIR. Stena Line submits that using such a broad range for impact assessment criteria encourages selecting 'Low', given the absence of any other criteria to rate the risk between 10% and 50% and the high threshold of selecting 'Medium' at 50% hazard risk, such that the results are skewed in favour of a low impact result (see Mona PEIR Chapter 12, Table 12.12). The matrix used for the assessment of the significance of the effect also offers a generous risk tolerance compared to maritime industry standards and Stena Line therefore queries its appropriateness and whether it has been properly stress tested. (m) Further, sections 12.5.2.4 and 12.5.2.6 of the Mona PEIR stipulate that, 'final assessment' has been carried out by 'expert judgment'. It is not clear to Stena Line exactly what experts have been consulted and where the 'expert judgment' has been sought. Stena Line therefore requests full transparency and disclosure in this regard. (n) With regard to the review of historical incidents within the shipping and navigation study areas, Stena Line queries the relevance of analysing historical incidents in an area that will be subject to a significant and unprecedented construction project. While Stena Line acknowledges that the review of MAIB and RNLI databases appears thorough, the future risks of condensing vessel traffic to narrower navigation corridors will be a wholly separate consideration compared to any historical data obtained of previous incidents in an area with significantly less navigational constraints or concentrated traffic density. (o) Further, Stena Line highlights that two recent allisions have not been considered in the PEIR, namely the "ROCK PIPER" (September 2022 allision between vessel and gravity foundation of future wind farm Fécamp) and "PETRA L" (April 2023 deviation of vessel into Wind Farm array area). Further, the PEIRs have not listed and seemingly not assessed reported 'near miss' incidents. In Stena Line's own research, at least 10 'near miss' incidents were identified involving vessels in or near	

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	Wind Farms. While the investigation of 'near miss' incidents may not be as detailed, they are imperative for assessing the risk profile of the Wind Farms in terms of navigation safety. (p) Overall, the conclusions of the PEIR on review of the historical incidents of vessels involving UK operational offshore Wind Farms is simplistic. Section 12.4.4.36 of the Mona PEIR concludes: "The accident return rates are generally low, between 10 and 45 operational years between incidents, the majority accounted for by project vessels and have a low consequence, without loss of life or serious pollution. Therefore, over a typical 25-35 year operational duration it would be expected that a typical project would experience three allisions, two groundings and one collision or near miss. It is notable that there are no recorded accidents involving large commercial shipping vessels and offshore wind farms in the UK. Nor did any of the recorded navigational incidents across the UK sector result in loss of life." (q) While Stena Line understands that review of historical incident data may be informative to a certain extent, it must be stressed that each Project and the associated risks will be particular and unique. Further, even one allision or collision in the navigation channels would seriously impact navigation of commercial vessels and ferry traffic, and in turn affecting Stena Line's operations. Further, the PEIR does not properly assess these risks, instead making statements such as: "Several routes, including the commercial routes through the Liverpool TSS and ferry routes from Heysham and Liverpool could pass within 1.5nm of the Mona Array Area and therefore this could impact the risk of collision. However, existing routes pass as close to other existing offshore wind farms such as West of Duddon Sands and Gwynty- Mor. Therefore, regular runners should be familiar with these effects." (See NRA, section 1.8.11.5) (r) Statements made in the PEIR like these are unhelpful and unwelcome and do not recognise the complexity of routeing, passage planning and operating a vessel, especially in dense traffic caused by offshore obstructions. (s) Stena Line are also concerned that the whilst the navigation simulations are undoubtedly useful, they are not a sufficiently realistic assessment of real-life conditions of navigation. For example, whilst it is noted that simulations involving the Mona array area did not result in any allisions (section 12.8.8.4 of the Mona PEIR, Chapter 12) Stena Line do not believe that this is necessarily indicative of the likely risk of allision. Similarly, reliance on statistics relating to current Irish sea windfarms should be treated with caution owing to the relatively small geographical area under consideration. (t) Stena Line's concern with the above conclusion is that certain incidents and/or navigational risks are accepted as inevitable and not properly analysed or mitigated for. While absolute certainty and safety are of course difficult, if not impossible, to achieve, it appears simplistic to accept and rely on historical incident data to the extent done by the Project Consortia. Stena Line encourages further	

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	navigational risk assessments and stakeholder engagement to ensure navigating the Wind Farms is as safe as possible. Adverse weather routeing (u) The nature of Stena Line's operations and the design of their vessels make it more susceptible to disruption due to adverse weather. Stena Line's operations rely on both freight and passenger traffic, where safety (primarily) and comfort and enjoyment (secondarily) play an important role in the customer experience. It should be noted that the two EFlexer Class vessels are certified to carry up to 1,000 persons on board. It is therefore vital to the continued operation of Stena Line's routes that appropriate weather routeing is available that minimally impacts passenger experience and sailing time. (v) The Project's footprint and the cumulative impact of the presence of such a volume of offshore windfarms effectively reduces the options available to our vessels' Masters to alter course to alleviate vessel motion. The consequence of our Masters no longer having a full range of routing and alteration options, may at the very least result in cancelled sailings. At worst, Masters may find themselves whilst on passage in a situation where excessive vessel motion cannot be mitigated by altering course and this in turn may potentially result in cargo shift or injuries to passengers and/or crew on board. It should be highlighted that the RoRo MV Riverdance suffered such a fate in January 2008 where her cargo shifted in adverse weather and the vessel grounded near Blackpool and was a declared a constructive total loss. (w) As a general comment, whilst the Admiralty Sailing Direction stated guidance on wind, wave and tidal conditions (section 12.4.4.11 of Mona PEIR, Chapter 12) are acknowledged, it has been identified during stakeholder engagement relating to the Wind Farms that higher seas and stronger winds are experienced to the South East of the Isle of Man during the prevailing South Westerly winds. (x) Section 12.8.4.4. of the Mona PEIR acknowledges the impact the Mona Array Area would have on vessel traffic: "During adverse weather, some sailings are delayed or inevitably cancelled irrespective of the presence of the Mona Array Area. However, with the presence of the Mona Array Area, sailings may be required to route a greater distance and duration. Over the course of a day, the aggregation of these delays would result in the potential for additional sailings to be cancelled where constraints such as hours of rest are exceeded. Such effects are already experienced by operators, but the presence of the MOWP may exacerbate this." Whilst cancellations are indeed a concern and a 50% increase (as noted in section 12.8.4.7 of the PEIR, Chapter 12) is significant, Stena Line are also (more commonly) affected by departures being	

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	delayed for a more favourable weather window. In terms of navigational considerations, a delayed departure and associated weather routeing is also particularly challenging, as is the corresponding impact on hours of rest. (y) The presence of the Wind Farms also risks cutting down adverse weather route options for Stena Line's mariners as they seek to safely transit. This includes the route to the east of the Isle of Man for the Belfast to Liverpool route. Section 12.10.4.14 of Mona PEIR Chapter 12 acknowledges that "the use of narrow corridors and frequent course changes may make [the east of Isle of Man route] unattractive." Stena Line submits that it is not merely 'unattractive' but due to the increased hazard of the proximity to wind turbines and the risks involved in sailing close to them in a restricted space that means the route (which is currently a weather safe route) will likely be removed as an option for Stena Line's vessels. This is unnecessarily restrictive to Stena Line's masters, who should be able to make a decision on whether to pass east or west of the Isle of Man based on the precise tidal conditions and corresponding seakeeping ability, the point being that either option should be available to them. (z) Further, the PEIR estimates that the estimated cancellations for Stena Line's Liverpool to Belfast route may increase from 14 to 21 cancellations and for Stena Line's Heysham to Belfast route from 10 to 15 cancellations (see Mona PEIR, Chapter 12, section 12.10.4.7). The PEIR estimates that the Liverpool to Belfast route would see an "increase in transit times by 24 minutes, a total delay of at least 38 minutes relative to the typical route of 418-495 minutes" (see Mona PEIR, Chapter 12, section 12.8.4.14). For the Heysham to Belfast route, the PEIR estimates that the cumulative impact of the Wind Farms would in adverse weather increase delays by at least 119 minutes (see Mona PEIR, Chapter 12, Table 12.25). (aa) The PEIR assesses the impact on adverse weather routeing to be 'Medium'. Considering Stena Line's current operations, a delay of this nature risks significantly impacting customer satisfaction. As previously stated, Stena Line as a ferry operator is also more susceptible to these type of disruptions. Mitigation measures (bb) Table 12.16 of the Mona PEIR sets out a number of measures adopted that form part of the project design. However, it is not clear to Stena Line exactly how many of these measures will be adopted or enforced, beyond a commitment by the Project Consortia to implement the measures. Further, Stena Line requests further explanations on what mitigation or contingency plans are in place in the event some measures are not adopted or properly enforced during the Project lifetime. (cc) Several proposed measures lack necessary detail. By way of example, it is unclear what 'poor conditions' for use of fog horns entail and how this requirement will be operated in practice. Similarly, the use of guard vessels "as required" does not make clear when or how such a measure will be taken.	

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	(dd) Other proposed measures are unrealistic and, if adopted, risk falling foul of international regulations. Section 1.8.6.31 of the Mona PEIR Chapter 12 discusses how the geometries of offshore wind farms could reduce the visible appreciation of other vessels and claims "however, larger vessels would be identifiable from AIS and therefore passing arrangements could be agreed." The suggestion that AIS should be relied on for collision avoidance is deeply concerning. This is especially so in light of Marine Guidance Note 324, which stresses that AIS information should be "treated with extreme caution and only used for enhancing situation awareness and not for collision avoidance decision making." (See MGN 324, section 4.10) Stena Line submits that such proposed overreliance on AIS as a collision avoidance tool could be in breach of COLREG 7(c). (ee) There is also a lack of detail on how measures will be enforced, for example in relation to Marine Operating Guidelines, vessel standards, PPE, training and vessel monitoring. Further, a statement that vessels should comply with international, UK and Flag State regulations cannot be classified as a mitigation measure. In any event, the proposed mitigation measures must be backed up by tangible and effective action points. (ff) Overall, while Stena Line recognises and supports the measures listed, its concern is how the measures will be achieved and regulated in practice so as to have any effect beyond being a statement of intent. Cumulative effects (gg) Generally, Stena Line is concerned with the PEIR's lack of consideration for how cumulative effects of several factors have not been considered when assessing navigational safety. For example, Table 1.27 of Mona PEIR, Chapter 12 (page 75) claims to show 'realistic traffic scenarios' in different areas with various vessels. Crucially however, the PEIR has not assessed the interactions between the different types of vessels (ferries, commercial, tug, fishing and recreational). Instead, they are assessed individually as to how each type may converge with vessels of the same type rather than how vessels of different types may converge. This therefore appears to present a highly theoretical scenario and the cumulative effects of different vessel types interacting has not been fully assessed. The PEIR's Cumulative Regional Navigation Risk Assessment confirms this by acknowledging that neither fishing and recreational vessels nor non-direct transits such as loitering or pilot boarding have been included in the analysis of concurrent frequency of two vessels meeting in the relevant areas (see NRA, section 1.8.6.3). This clearly shows that cumulative effects of different vessels have not been properly analysed. (hh) Another concern is how the combined footprint of the Wind Farms will make traversing the corridors between them more difficult for Stena Line and other vessel operators. The Cumulative Regional Navigation Risk Assessment recognises that "vessels proceeding north to the east and west of the Mona Array Area would not have visual sight of one another until potentially within the	

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	constrained corridor" (see Morecambe PEIR, Appendix 14.2, section 8.7.4 and see also NRA section 1.8.6.31). This is a very real issue for any vessels transiting the area as there is a danger that vessels interpret the COLREGs differently based on their own visual sightings. While the PEIR makes reference to COLREGs, it is not acknowledged that COLREGs section II (Rules 11 to 18) only apply to vessels that are in sight of one another. The need for proper mitigation measures is therefore crucial to avoid collision risk. (ii) The NRA at section 1.10.2.11 further notes in relation to the Mona to Morgan corridor that the width was insufficient for collision avoidance: "In particular, were two vessels to meet in the corridor a preferred 1nm CPA could not be maintained from the other vessel and the wind turbines." The combined footprint of the Wind Farms and how this would force vessel traffic into narrow navigation corridors is of serious concern to Stena Line, whose vessels transit the relevant areas regularly. Insufficient collision avoidance is unacceptable as Stena Line needs to look after the safety of its crew and passengers. (jj) The cumulative effects of the Wind Farms would also exacerbate the impact of adverse weather routeing as vessels transit the designated corridors. The Navigation Simulation exercises revealed that adverse weather conditions would be uncomfortable and hazardous to passengers, likely leading ferries to take a more circuitous route around the Wind Farms rather than through the corridors. The NRA notes however that if weather conditions would worsen while a vessel was in the corridor, "there is little opportunity for the master to mitigate those conditions. Therefore, as excessive roll starts to be experienced, the master may for instance turn into wind, but in doing so will increase the risk of allision with the offshore wind farm" (see NRA, section 1.8.8.4). Such risks are highly concerning and not acceptable to Stena Line. 8.3 Impact on the environment (a) Stena Line's vessels will be required to deviate around the Wind Farms, which will increase the transit distance (as discussed above) and in turn will increase fuel consumption. (b) Increased fuel consumption increases the vessels' greenhouse gas emissions and as such will have a detrimental environmental impact. Further, this may impact Stena Line's ability to comply with international and regional environmental emissions regulations as well as its ability to achieve Stena Line's own climate goals. The environmental impact for ferry operators is recognised in the PEIR (see NRA, section 1.8.3.1). (c) The IMO's Carbon Intensity Indicator (CII) regulation, which came into force in January 2023, are a set of mandatory measures implemented by the International Maritime Organization (IMO) to reduce greenhouse gas emissions from commercial ships as part of efforts to combat pollution and climate change. The CII Index of a vessel is used to determine how efficiently ships operate. Every vessel is required to have its CII rating calculated and independently verified. Vessels are given a CII rating of	

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	A, B, C, D, or E, with A being the best possible rating. A ship that is rated D for three consecutive years, or E in one year (e.g. those with the highest carbon intensity) will be required to submit a "corrective action plan" that outlines how the vessel will be brought to a minimum C rating. The most effective mitigations to improve the CII rating of a vessel is to reduce its speed on passage and improve its voyage planning. Clearly large new obstructions on passage such as windfarms will adversely affect a scheduled service where increased speed will be required to ensure timetabled services are met. If a ship or ship owner is non-compliant with the CII regulation, they may face financial penalties and increased costs for refinancing non-compliant ships, as well as a poor CII rating which could affect their business in the long term. (d) In line with the regulations, Stena Line have calculated the operational CII for all its vessels that fall within the scope of the regulation. Based on data and calculations available at the time of this response, both Stena Edda and Stena Embla are estimated to fall into CII Band B. Stena Foreteller meanwhile is estimated to fall within Band E. Based on data and calculations available at the time of this response the Stena Hibernia is estimated to fall within CII Band B and Stena Scotia in Band D. Any increase in speed and/or fuel consumption required to navigate around the Windfarms is therefore a risk to Stena Line's vessels' ability to comply with the regulation. 8.4 Stena Line's ability to continue operating its routes (a) It is clear from the above analysis that a combination of factors, including (1) the deviation required by Stena Line's vessels during construction and operation of the Wind Farms, (2) adverse weather routeing, and (3) navigational risks will have a financial and operational impact on Stena Line. The consequences will include delays to voyages due to the longer routes required and increased fuel consumption. This is likely to have a knock-on effect on customer satisfaction and may ultimately make continued operation of Stena Line's routes unviable. (b) Separately, the construction and footprint of the Wind Farms may potentially restrict or reduce the opportunities for Stena Line to develop new routes in the future where the Wind Farms increase travel distance and risk making any proposed routes less competitive to other methods of transport. 9. ONSHORE IMPACT 9.1 General (a) Whilst Stena Line acknowledges that the Mona Wind Farm will not be using the same Transmission Assets as the Morecambe and Morgan Wind Farms, given the relative close proximity of the landfalls, there is still likely to be a cumulative onshore impact on North Wales and Northwest England from the Wind Farms. It is therefore unclear why Mona Wind Farm has produced an assessment which does not consider the cumulative impact of the Wind Farms, or flagged that it is	

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	unable to do so due to the lack of information available on the Morecambe and Morgan Transmission Assets. 9.2 Seascape, Landscape and Visual Resources (a) Section 26.13.5.13 of the Mona PEIR Chapter 26 acknowledges that there is "a sense of 'filling' of the area between the North Wales and Northwest England clusters" and that, throughout the operations and maintenance phase of the Mona Wind Farm will be of moderate or major adverse significance on the aesthetic and overall character of the landscape and seascape on the Mona Array Area (and adjacent areas) (see sections 26.13.5.15 and 26.13.6.15). Figure 15.21 of the Morgan PEIR Chapter 15 also highlights the volume of wind farms (beyond Mona, Morecambe and Morgan). (b) Stena Line's view is that these comments extend beyond matters of aesthetics and character. Rather it is indicative that there is overcrowding of wind farms (including but not limited to Morgan, Mona and Morecambe) in navigable waters which (as discussed above) will impact Stena Line and other stakeholders in an adverse way (i.e., increased collision and allision risks). 9.3 Radar (a) Stena Line has some concerns arising out of the PEIR Submissions made in respect to the effect of high densities of high Wind Turbine Generators ("WTGs") on Marine Radar. PIANC WG 161 ('Interaction between offshore wind farms and maritime navigation') written by the Maritime Navigation Commission of the World Association for Waterborne Transport Infrastructure identifies potential radar interference from navigating in proximity to high density windfarms. Stena Line has additionally accessed pictures showing the effect on the radar of the P&O ferry MV Norbay caused by multipath echoes caused by the North Hoyle windfarm off the North Wales coast. (b) Morecambe PEIR Chapter 16 at section 16.202 states: "Aviation lighting fitted to offshore WTGs could cause confusion to the maritime community as the specification for the lighting to be displayed below the horizontal plane of the light filament itself could cause mariners some confusion. This confusion could result in WTGs with conflicting warning lighting representing a collision risk to maritime surface vessels." (emphasis added) (c) Firstly, it is noted that this observation was not made in the corresponding Mona or Morgan Offshore Generation Assets PEIR Submissions, which creates concern as to whether the Mona and Morgan Offshore Wind Farms have taken this problem into consideration (and are therefore taking steps to mitigate the risks involved). (d) Secondly, Stena Line notes that any confusion as to the identity/purpose of a warning light poses a serious navigational risk to all marine traffic, including Stena Line's vessels. It is paramount that a full consultation in respect of the use of lights on the WTGs is sought however, it is not clear as to who (if anyone) has been consulted on this point. More details are needed for Stena Line and the wider	

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	maritime community to provide input as to the safety of the new proposed aviation lighting. While it is acknowledged that the second round of Navigation Simulation exercises in May 2023 attempted to simulate the night-time visual effect of such an array of red warning lights, Stena Line notes that it would be unrealistic to expect any simulator to be able to provide a true visualisation of what this may look like in a real-world scenario. (e) Thirdly, Stena Line expresses its concern that navigation lights on the wind turbines may risk interfering with vessels' ability to identify other navigation lights and impact their ability to manoeuvre safely. The difficulty posed by background lights when navigating vessels at night is recognised by COLREGs Rule 6(iv). 9.4 Climate Change (a) Stena Line acknowledges that the Wind Farms will likely have an overall beneficial effect in respect of climate change. (b) However, the figures estimated do not provide an accurate and complete assessment of the cumulative or individual impact of the Mona, Morecambe and Morgan Offshore Wind Farms on direct/indirect greenhouse gas emissions ("GHG Emissions"): (i) The GHG Emissions for the Transmission Assets for Morecambe and Morgan Wind Farms have not been considered in the assessments. There are GHG Emissions associated with the Transmission Assets for Morecambe and Morgan Wind Farms which should be considered in determining the overall GHG Emissions footprint and carbon payback periods (see Morecambe PEIR Chapter 21, section 21.44). (ii) Indirect GHG Emissions have not been fully considered. Importantly, the increase in GHG Emissions resulting from the additional time spent by vessels (including Stena Line's vessels) in transiting the Wind Farm areas has not been considered. It appears that only GHG Emissions associated with the Wind Farms have been considered (i.e., GHG Emissions from vessels transporting materials to the Wind Farms) (see Morecambe PEIR Chapter 21, Table 21.9). (iii) There have been no cumulative assessments on the impact of the Mona, Morecambe and Morgan Offshore Wind Farms on direct/indirect GHG Emissions or the climate generally. This is particularly relevant where different phases of the Projects are predicted to produce different levels of GHG Emissions (i.e., as the construction phase of the Wind Farms are anticipated to produce the most direct GHG Emissions (see, for example, Morecambe PEIR Chapter 21, section 21.57)), this means that there may be a cumulative adverse impact for a significant period across the Projects before any cumulative net benefit is seen. It is impossible to make an assessment on this point given that insufficient information is available on the Morgan and Morecambe Transmission Assets (see Morgan PEIR Chapter 17, section 17.13.1.2).	

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	(c) Stena Line is committed to reducing its emissions both onshore and at sea and invests in clean energy technology. The increased time it will take for Stena Line to perform its routes (in normal and adverse weather conditions) as a result of the footprint of the Wind Farms will lead to increased GHG Emissions and will be counter-productive to Stena Line's current policies, and the purpose and intent of the Wind Farms. (d) This increase in GHG Emissions is not anticipated to be insubstantial. Indeed, in considering increased shipping movements in respect of vessel movements related solely to the operation and maintenance of an example windfarm, the Morecombe PEIR suggests that these movements alone contribute 14.3% to total GHG emissions of the example windfarm (Morecambe PEIR Chapter 21, section 21.16). (e) Inaccurate GHG Emissions statistics make it impossible to assess the efficacy of the Wind Farms and their net climate benefit. 9.5 Socio-economics (a) Stena Line reserves the right to comment further in respect to the Morgan and Morecambe Transmission Assets before it is able to comment substantively on any socio-economic impacts that may impact Stena Line's operations. 9.6 Human Health Assessment (a) Stena Line notes that there is insufficient information in respect of the cumulative impact of the Mona, Morecambe and Morgan Offshore Wind Farms on Human Health deriving from navigational risks or otherwise, to be able to make a cumulative effects assessment ("CEA") (see Mona PEIR Chapter 30 at section 30.11.1.10, Morecambe PEIR Chapter 19 at section 19.190). Although, it is queried why Morgan Offshore Wind Project Generation Assets has not included a similar reservation (see Morgan PEIR Chapter 19 at section 19.10). (b) It is understood that the CEA for the Wind Farms will be contained within the Environmental Statement health chapter submitted in support of the application for Development Consent (see Mona PEIR Chapter 30, section 30.11.1.10, Morecambe PEIR Chapter 19 section 19.193). (c) It is therefore not possible to fully comment or appreciate the collective impact of the Wind Farms at this stage, save that it is noted that the potential cumulative impact: (i) on commercial operators (including strategic routes and lifeline ferries) is considered to be "moderate adverse"; (ii) on adverse weather routeing is considered to be "major adverse"; (iii) to vessel collision risk is considered to be "major adverse"; and	

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	(iv) on allision risks to vessels is considered to be "moderate adverse" (see Morgan PEIR Chapter 19, section 19.10.2.1, Mona PEIR Chapter 30, section 10.11.2.1). (d) The Mona PEIR Submissions also suggest that there may be adverse cumulative impact to essential recognised sea lanes and access to ports and harbours (see Mona PEIR Chapter 30, section 10.11.2.1), which is not reflected in the corresponding PEIR Submissions made in respect of the Mona and Morecambe Wind Farms. (e) The impact of the above is stated to have the potential to be "influential in widening health inequalities" as a result of "ongoing and more frequent disruption in access to goods and services and increased shipping risk" (Mona PEIR Chapter 30, section 30.11.2.8). It is thought to be of moderate adverse significance if unmitigated (se Mona PEIR Chapter 30, section 30.11.2.6). (f) There is the potential for adverse effects associated with shipping's access to human health, when Mona, Morecambe and Morgan are considered together. The Morecombe PEIR Chapter 19, section 19.193 states: "Discussions between the projects developers is ongoing to develop measures to avoid navigational impacts that could constitute a likely significant effect for public health" (emphasis added). (g) As stated above, Stena Line's concerns are that the shipping risks are not going to be properly mitigated effectively. To emphasise, Stena Line provides a lifeline ferry service to several communities. In particular, Stena Line's concerns in respect of overcrowded shipping lanes and the associated increased collision and allision risks, which will in turn affect human health, are restated. (h) Stena Line requires further details to be provided as to the mitigation steps being taken to reduce the impact of human health, particularly where there is an increased risk of fatalities and injuries during navigation, to make an informed opinion and position. Noting that section 12.8.4.19 of the Mona PEIR, Chapter 12, refers to "possible minor injuries" arising from vessel heading options being constrained during adverse weather, the PEIR clearly underestimates the sheer number of passengers and crew carried by Stena Line. As an example, there are up to 1,000 persons carried onboard the E-Flexer class vessels. The prospect of minor injuries across such a large passenger and crew base is significant. 10. MITIGATION 10.1 Stena Line welcomes mitigation efforts to ensure the impact on its routes and operations are minimised. These include amendments to the Mona Array Area to maintain a 2nm offset in the approaches to the Liverpool Bay TSS and to reduce the northern extent of the Mona Array Area by approximately 3nm to increase the gap between the Mona and Morgan Array Areas (see Mona PEIR Chapter 12, section 12.14.1.2). While the Project developers have undertaken to carry out further navigation risk assessments applying these reduced boundaries of the Mona Array Area, Stena Line	

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	cannot at this time comment on this measure as it has not been considered in the PEIR and NRA. Given the findings of the NRA as to the unacceptable risk levels caused by the Wind Farms, Stena Line contends that reducing the array boundaries may be the only effective mitigation measure available. Stena Line will continue to fully engage with the consultation process but reserves its right to comment as to whether the proposed revised boundaries are sufficient to reduce the navigation risks to an acceptable level. 10.2 As noted in section 8.2 above however, the control risks and proposed mitigation measures to address the unacceptably high risks to navigation safety are not properly detailed and do not contain a proper plan for implementation. Stena Line urges the Project Consortia to consult all stakeholders and also consider the impact of the proposed Orsted Wind Farm when developing mitigation measures. 11. OTHER INTERESTED PARTIES 11.1 Alongside Stena Line, regional ferry operators that have been involved throughout the consultation period are Isle of Man Steam Packet, Seatruck Ferries and P&O. However, as recognised in the PEIR, Stena Line is the ferry operator most impacted by the footprint of the Wind Farms and will likely see its routes affected the most. Based on the forums attended by Stena Line's representatives, it is understood that these ferry operators share many of the same concerns as Stena Line. These include the navigational risk posed by the Wind Farms (in particular when considered cumulatively), the safety of passengers and crew, the impact on ferry routes (including delays and increased costs) and a consequent adverse impact on customer satisfaction (for example due to longer transit routes and more frequent cancellations). Stena Line also calls on the Project Consortia to prioritise the concerns raised by the UK Maritime and Coastguard Agency (MCA) and the UK Chamber of Shipping. 11.2 Commercial fisheries operators also share many of the same concerns as Stena Line. These include the concern for spatial squeeze on fishing vessels due to changes in ferry routeing as a result of the footprint of the Wind Farms (see Mona PEIR, Chapter 11, section 11.1, Morgan PEIR Chapter 11, pages 39-40). 11.3 It is particularly noteworthy that many types of vessel traffic are expected to increase in the short to medium term in the region. Given the expected operational life of the Wind Farms is around 35 years, the risk assessments need to account for not just the current interested parties but whether these will increase over the years. 11.4 The Morecambe PEIR acknowledges that national port traffic is forecast to grow in the long term with unitised freight (including Ro-Ro vessels) "forecast to grow strongly, driven by economic growth" (see Morecambe PEIR Chapter 14, section 14.95). Further, the Port of Liverpool has invested in	

REP1-078 and REP1-079 Reference	Written Representation Comment	Applicant's response
	shoreside infrastructure to better handle larger vessels capable of carrying more cargo, demonstrating their particular growth intention. 12. CONCLUSION 12.1 Stena Line reiterates that it is not opposed in principle to the development and construction of the Wind Farms and recognises the consultations that have so far taken place. However, the PEIRs have not settled all concerns that Stena Line and other stakeholders have raised. 12.2 In particular, the Navigation Risk Assessment concludes that the construction as currently planned renders unacceptably high risk scores. This is especially alarming for Stena Line, as a high and unacceptable risk of collision between passenger / ferry vessels and other commercial vessels was found. 12.3 The mitigation measures identified have not been implemented and Stena Line notes that many lack detail or practical enforcement. 12.4 Stena Line provides a lifeline service to local communities and is fully committed to continuing to operate its routes. However, there is a real concern that the impact of the Wind Farms, as currently set out in the PEIR, on Stena Line's operations will make this difficult if not impossible.	

2.15 Tan-y-Mynydd Trout Fishery Ltd

Table 2.15: REP1-080 - Tan-y-Mynydd Trout Fishery Ltd

Reference	Written Representation Comment	Applicant's response
REP1-080.1	In general terms we have no objections to the proposed Mona offshore windfarm development or the majority of its proposed onshore route and works. Indeed we see this development as being a very positive contributor to the overall long term UK energy solution.	Thank you for providing Written Representation to the Examination of the Mona Offshore Wind Farm at Deadline 1. The Applicant acknowledges your comments and response is provided to points in turn below. The Applicant looks forward to continuing to work with Tan-y-Mynydd Trout Fishery throughout the Examination and subsequent construction of the Mona Offshore Wind Farm.
REP1-080.2	Notwithstanding the above, we do have specific concerns regarding the onshore works local to Moelfre. Those concerns, relate to the potential negative impact the cable route and construction works could have on the underground water routes that ultimately provide the fishery with both its spring and brook water feeds. The choice of preferred route to the South of the B5183 over the alternative route to immediate North of the fishery grounds does give us real cause for concern. The alternative cable route would have been at a lower altitude than the fishery as such we believe the likelihood of interference with our water supply sources would have been significantly reduced. The preferred route appears to traverse Moelfre Mountain higher than where our above ground water source emerges, therefore it is unclear how the proposed permanent cable route, and also its construction works, may impact on the springs which ultimately supply the fishery.	The impact of the Mona Offshore Wind Project on private water supply was a key consideration of the onshore site selection process for the onshore cable route (document AS-016). The northern onshore cable route option east of the Glascoed Road – Abergele Road crossroads was selected as the final onshore cable route option primarily to remove any immediate proximity to the Tan-y-Mynydd Trout Fishery. Environmental Statement - Volume 7, Annex 1.2: Groundwater sources of supply – hydrogeological risk assessment (APP-116) provides a hydrogeological risk assessment of impact to licenced groundwater abstractions and private groundwater supply sources and proposed mitigation measures. The Onshore Cable Corridor is located up gradient of the spring that feeds the ponds at Tan-y-Mynydd Trout Fisheries, however it is located at considerable distance and at a much higher topographical elevation, which places the spring it at a low risk.
REP1-080.3	To date we have had numerous site visits from Mona surveyors and other representatives. Until recently the focus of those site visits has been more closely connected with the flora and fauna present on or using the fishery grounds. That said, the most recent site visit on Monday 13th May 2024 was wholly focused on our concerns over the natural water supplies we rely on. That visit included the Mona representatives and our owner Martin Chambers exploring the course of the brook which feeds our lower three lakes.	The Applicant notes your response.

Reference	Written Representation Comment	Applicant's response
	The other two lakes being fed off another underground spring the source and route of which are unknown to us.	
REP1-080.4	In summary our concerns are as follows: 1. The potential for the construction works to cause the source of the brook and spring that feed the fishery being either interrupted or worse still permanently disrupted. 2. The potential for the water sources supplying the brook feeding the fishery to be permanently cutoff / diverted elsewhere by the cable routes. 3. The potential for the underground spring(s) that feed the top lakes at the fishery to be disturbed or re-routed by either the construction activities or the permanent works.	The Applicant has engaged with Tan-y-Mynydd Trout Fisheries post submission of the DCO as noted in the Applicant's response to Relevant Representations (PDA-008). An initial site visit has been undertaken to understand the hydrology and hydrogeology of Tan-y-Mynydd Trout Fisheries the site. The Applicant will continue its discussions with the trout farm to identify the appropriate mitigation e.g. monitoring. The mitigation will be informed by a review of geological information and hydrogeological monitoring obtained from engineering site investigation locations in the vicinity of Tan-y-Mynydd Trout Fisheries which will refine the conceptual understanding of the local hydrological and hydrogeological regime.
REP1-080.5	Therefore, given the uncertainty over the sources and underground routes of the various water supplies that we rely upon we would suggest that a number of further activities and/or undertakings must be put in place by Mona to protect the long term interests of the fishery, namely we would offer the following suggestions: a. A comprehensive set of detailed investigations and surveys of the underground formations and water course be specified and implemented. There should be a minimum of a full year's monitoring undertaken. This would assist in identifying any weaknesses or vulnerability in any identified water courses. b. An avoidance/mitigation strategy for the impact of both the permanent works and construction works across Moelfre Mountain should be put in place and suitable monitoring of compliance must accompany it. c. It may be that carrying out the construction works on Moelfre Mountain during the winter months would provide more obvious and potentially immediate indications of any interference with thesewater courses. Certainly our concerns would be exacerbated were those works to be carried out in the summer months, when the water course flows are at their weakest. d. In addition to the above we believe that the fishery should	Following the meeting between with the fisheries and the Applicant on 13 May 2024, it was agreed that monitoring of the boreholes which had been installed along the order limits in early 2024 would continue to be monitored to obtain further data regarding the water levels in the area. This monitoring is currently ongoing and engagement with the fisheries will continue to identify the most appropriate mitigation based on the findings. The Outline Construction Surface Water and Drainage Management Plan (APP-218) secures temporary measures to control water runoff from the construction compounds and work areas at Section 1.6.4. Furthermore, measures to control the programming of certain works to reduce flood risk and the risk of water pollution are also set out in Section 1.6.3. The preparation of a detailed Construction Surface Water and Drainage Management Plan to be in accordance with the principles contained within the Outline Plan are secured under Requirement 9 of the draft Development Consent Order.

Reference	Written Representation Comment	Applicant's response
	be provided with a suitable legal undertaking/indemnity such that if any water source/course supplying the fishery is adversely affected by or following the cabling works/routes then Mona will make suitable financial reparations to the fishery or alternatively purchase the fishery lands	
REP1-080.6	As we advised at the start of this submission we are very supportive of the great good that will be achieved by the construction of the Mona windfarm. As such we remain willing and keen to work with the Mona team to find a set of solutions to our concerns. Should the inspectorate wish to carry out a site visit of the fishery grounds, we would be most pleased to accommodate its representatives.	It is welcome that the Tan-y-Mynydd Trout Fishery is supportive of the Mona Offshore Wind Farm Project. The Applicant looks forward to continued engagement with the Tan-y-Mynydd Trout Fishery as the Project progresses.

2.16 West Coast Sea Products

Table 2.16: REP1-081 – West Coast Sea Products

Reference	Written Representation Comment	Applicant's response
REP1-081.1	1. Summary WCSP Ltd have been catching and processing Queen Scallops (also King Scallops) in the eastern Irish Sea since 1971, currently employing over 100 people at our processing site and 30 fishermen who rely on the health of the Queen Scallop fishery. We object to the proposal as its area overlaps the most important Queen Scallop beds of the fishery; and current proposal measures do not go far enough to respect this important fishery. The fishery is one of 4 global Queen Scallop commercial fisheries, therefore Mona OWF raises significant socioeconomic and market implications. There are also no mitigation measures proposed to financially compensate Queen Scallop operators for any unforeseen consequences such as short or long-term habitat loss. We consider that the proposal in its current state presents a possible Moderate or Major (leaning towards major) impact. This document initially assesses the proposal in relation to our vessels' 2023 fishing activity for Queen Scallops and we conclude that over 50% of the fishery will be situated within OWF infrastructure in the future between Mona (and Morgan for cumulative considerations). Secondly this document outlines the practical issues of fishing vessels being able to continue fishing in which are poor weather autumn & winter fisheries. Finally with Mona (and Morgan cumulatively) being unique in covering so much of the sandy/gravelly Queen Scallop nursery & fishing grounds, there is a real risk of loss of their habitat and the commercial fishery we rely on, for which the Fish & Shellfish Ecology Chapter unacceptably also dismisses as an impact, rated as minor.	The Applicant notes the response and acknowledges the extent and distribution of queen and king scallop fishing activity within the vicinity of the Mona Array Area and cumulatively with the Morgan Offshore Wind Project: Generation Assets. The Applicant also notes the importance of this area not only to commercial fishing vessels but also associated onshore processing activities. The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 to understand stakeholder requirements for co-existence and will continue throughout the lifetime of the project. A Fisheries Liaison and Co-existence Plan (FLCP) is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline version of this plan has been included with the Application (APP-199), which is secured through the deemed marine licence (Condition 18 in Schedule 14 of the draft Development Consent Order (DCO) (C1 Draft Development Consent Order F04) and is expected to be secured in the standalone marine licence. Mitigation and monitoring commitments are set out within Volume 2, Chapter 6: Commercial fisheries (APP-058) and the Mitigation and monitoring schedule (J10 F02). The mitigation measures are designed to enable co-existence as far as possible during all project phases. They include commitments to not close the entire development area during the construction phase, the establishment of a Scallop Mitigation Zone (SMZ) which will be free of wind turbines and offshore substation platforms (a commitment which is a 'first' for offshore wind in the United Kingdom as far as the Applicant is aware) and the orientation and spacing of infrastructure such that fishing can continue within the Mona Array Area. As a result of these measures, commercial fishing receptor groups will be able to continue fishing within parts of the Mona Array Area during construction. During the operations and maintenance phase, the measures will provide the space for continued fishing within the Mona Array Area and allow fishing vessels to transit through the area.
REP1-081.2	2. Current Queen Scallop fishing activity evidence and quantifying ground altered by OWF infrastructure	Fishing will also be permitted within those parts of the Mona Offshore Cable Corridor where construction activities are not taking place. This will be achieved via the use of rolling advisory exclusion zones of 500 m around vessels installing

Reference	Written Representation Comment	Applicant's response
	This section provides an initial background of Queen Scallop fishing for 2023 in relation to the Mona proposal area in the eastern Irish Sea as well as Morgan (separate project and application) which requires examination as the two projects collectively by the same developer capture most of the commercial Queen Scallop fishing ground in the eastern Irish Sea. It should be noted that the King Scallop fishery will also be negatively affected by the development but for the purpose of this response, our representation concentrates on the Queen Scallop fishery which will we regard as more important in this circumstance. Further evidence on the impact to the King Scallop fishery can be provided on request.	export cables. This will avoid the entire Mona Offshore Cable Corridor being closed to fishing vessels during the construction phase. Additionally, the use of 500 m rolling advisory exclusion zones will apply to the installation of inter-array and interconnector cables. Consequently, no mitigation measures linked to any form of financial compensation are required or are proposed by the Applicant. The Applicant acknowledges the extent and distribution of queen and king scallop fishing activity and spawning and nursery grounds within the vicinity of the Mona Offshore Wind Project. The available research on queen and king scallop responses to impacts including temporary habitat loss and disturbance, increased suspended sediment concentrations, and long term habitat loss has been assessed within Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), with these species included specifically as important ecological features and their higher sensitivity to each impact considered in the conclusion. For each impact (both project alone and cumulatively), the overall assessment concluded no significant impact (minor adverse significance) in all project phases, with no further specific mitigation measures required beyond the measures adopted as part of the project. The Applicant acknowledges the WCSP's concerns relating to habitat loss and the results of the assessment presented in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). This matter is addressed in the response to the WCSP's detailed comments on this matter in REP1-081.13 below.
REP1-081.3	The maps below shows 2hourly Queen Scallop VMS data for two of our vessels for the year 2023 in relation to Mona - and Morgan importantly for cumulative impact considerations. We do not hold GIS software other than Google Earth to analyse fishing intensity but in terms of spatial data, Mona and the export cable corridor to the south shall be situated on approx.. 38% of 2023's fishing activity for Queen Scallops. This % assessment considers that the Scallop Mitigation Zone presented in the coexistence plan in its current form for Mona will not serve as a true Scallop Mitigation Zone where a vessel skipper would not be affected by OWF infrastructure, therefore our opinion considers the impact to be as high as 38% (note only based on 2023 data). This % affected would be reduced if the Scallop Mitigation Zone was perceived more by ourselves to	The Applicant notes the response and acknowledges the calculations made with regard to spatial extent of current queen scallop fishing in relation to the Mona Array Area. It is noted that the WCSP's calculations are based on the Mona Array Area as presented within the Preliminary Environmental Information Report (PEIR). The calculations therefore do not consider project changes and commitments made post-PEIR, i.e. the reduction in extent of the Mona Array Area from PEIR, from approximately 450 km^2 to 300 km^2. The cumulative assessment (Volume 2, Chapter 6: Commercial fisheries (APP-058)) considered the potential loss of fishing grounds from Mona Offshore Wind Project, Morgan Offshore Wind Project and Morecambe Offshore Wind Farm during the operational phase and concluded that whilst the cumulative magnitude of impact would have a regional spatial extent, be of long-term duration and continuous, with low reversibility, a minor adverse impact significance was concluded on the basis that the reduction in access to scallop resulting from the

Reference	Written Representation Comment	Applicant's response
	actually compensate better than its current form (discussed in sections ahead).	cumulative impact would not lead to more than a 5-10% reduction of the annual value of landings (informed by expert judgement that is based on data analysis, stakeholder feedback, the array layouts presented and how these may affect fishing activity).The Applicant notes the WCSP's concern regarding the current indicative size of the SMZ within the Mona Array Area. At present, the SMZ covers approximately 37% of scallop grounds located within the Mona Array Area. The currently proposed SMZ seeks to achieve a balance between enabling co-existence with commercial fisheries whilst retaining sufficient space to deliver the Mona Offshore Wind Project. The Applicant acknowledges the preference of the WCSP for no inter-array cables (or cable protection if/where required) within the SMZ. However, the option to place cables and cable protection within the SMZ has been retained to ensure efficient and viable movement of electricity. The Applicant has committed to minimising these cables and those that are east to west aligned as far as practically possible, which is compatible with dominant tow orientations exhibited by queen scallop gear within the Mona Array Area (such information was communicated via Project-specific consultation). This coincides with the outline FLCP submitted by the Applicant of the Morgan Offshore Wind Project: Generation Assets and is considered within the assessment of cumulative effects in Volume 2, Chapter 6: Commercial fisheries (APP-058).
REP1-081.4	The cumulative impact of Mona is further increased in a future scenario with Mona and Morgan both in construction and eventual operation shows that an additional 15% of 2023's VMS data shall fall within Morgan. Again the Scallop Mitigation Zone for Morgan which shall comprise of a triangular area to the west bound by Wind Turbine Generators and cable routing through the Scallop Mitigation Zone is even less convincing as an Scallop Mitigation Zone than Mona. Therefore for this reason the Scallop Mitigation Zone for Morgan will not reduce the effect the windfarm shall have on queen Scallop vessel operations. The overall cumulative effect is that 53% of Queen data for 2023 shall fall within the Mona and Morgan windfarm proposal areas. With just over half the Queen Scallop fishery being subject to spatial squeeze, this will result in increased pressure and displacement in other areas affecting the health balance of the fishery. Should the applicant consider designating more effective Scallop mitigation Zone deserving of the Scallop industry's needs to operate then the overall cumulative effect would be reduced from 53% to possibly 20-25%.	
REP1-081.5	3. Impact of infrastructure & significance of effects Page 108-115 of Chapter 6: Commercial Fisheries outline that there will be only a minor effect on Scottish west coast vessels, i.e. us as a receptor, during construction, operation and cumulatively. This is arrived at by the ES with a reliance that the Doc ref J10 (the coexistence plan) will deliver as a plan to revert fishing access to near-baseline conditions. We do not agree this scoring and we are of the opinion that there will be a moderate or major effect on our operations. Our justification is provided in this text.	The Applicant has assumed that the key impact of concern to the WCSP and which forms the basis of their comment is 'loss or restricted access to fishing grounds' as assessed in section 6.8.2 of Volume 2, Chapter 6: Commercial fisheries (APP-058). The Applicant engaged with fishing stakeholders in Autumn 2022, post-scoping, on requirements to allow access to and continued fishing within Mona Array Area and Mona Offshore Cable Corridor. As set out under section 6.3 in Volume 2, Chapter 6: Commercial fisheries (APP-058), this engagement highlighted a preference for avoidance of infrastructure over queen scallop grounds, sufficient spacing between infrastructure to allow continued access and fishing, orientation of wind turbines against dominant towing directions, burying of cables and minimising the use of

Reference	Written Representation Comment	Applicant's response
		cable protection. In Winter 2022, further engagement was undertaken specifically with scallop fishing stakeholders on the potential development of a SMZ. Whilst feedback from this engagement was helpful and constructive, it was not feasible to refine initial proposals into formal mitigation measures prior to publication of the Preliminary Environmental Information Report (PEIR). Additionally, the Applicant was keen to understand the views of stakeholders across the wider proposal through the statutory consultation on the PEIR, to determine the full suite of changes potentially required to address any concerns raised. Therefore, the assessment presented within the PEIR did not include these potential mitigation measures and consequently concluded a moderate adverse impact (which is significant in EIA terms) for 'loss or restricted access to fishing grounds' for the Scottish west coast scallop vessels receptor group. Following the publication of the PEIR and in light of commercial fisheries and wider feedback on the PEIR, the Applicant met with commercial fisheries stakeholders in September 2023 to provide more specific details on the following mitigation measures, which were well received (see Appendix H.21 of the Technical Engagement Plan Appendices - Part 2 (F to M) (APP-043)): • Increased spacing from 1,000 m between rows of wind turbines and OSPs and 875 m between wind turbines and OSPs in a row to a minimum of 1,400m within or between rows, subject to micrositing – to increase ability to travel through and fish within the wind farm array area • Inclusion of a SMZ over core queen scallop grounds - to reduce potential for impacts to scallop and enable continued fishing of these core grounds by vessels that currently fish in this area • Orientation of wind turbines rows in a roughly north south orientation - to allow vessels to maintain the dominant tow direction in this area • Commitment to burying cables as far as possible and minimising cable protection where burial is not possible - to reduce the potential for gear snagging risks / maintain ability to continue fishing within the order limits. These commitments have been secured in Outline FLCP (APP-199) with the requirement for the Final FLCP (which must accord with the commitments in APP-199), secured under Condition 18 in Schedule 14 of the draft DCO (C1 Draft Development Consent Order F04) and expected to be secured in the standalone marine licence. In light of the commitments to the preceding mitigation and on the basis that fishing will be able to continue within the Mona Array Area during the operational

Reference	Written Representation Comment	Applicant's response
		phase, the assessment in Volume 2, Chapter 6: Commercial fisheries (APP-058) concluded a minor adverse effect (which is not significant in EIA terms) on 'loss or restricted access to fishing grounds' for the Scottish west coast scallop vessels receptor group.
REP1-081.6	3.1 Outline Fisheries Liaison and Co-Existence Plan Through consultation with the applicant, a co-existence plan has been presented to support the application. This includes a set of measures which would help to accommodate Queen and King Scallop fishing as much as possible in the situation where offshore windfarm infrastructure is constructed on scallop grounds in this area. For instance, the applicant has included a number of measures which we support such as north-south rows of wind turbine generators and cable routing with 1400m spacing. This supports the moving of fishing vessels who generally tow north south with the tides when fishing in this area. There will also be a Scallop Mitigation Zone which is welcomed albeit is smaller envelope than we expected following consultation.	The Applicant acknowledges the support given to commitments outlined within the Outline FLCP (APP-199).
REP1-081.7	The main disappointing aspect of the co-existence plan however is the commitment towards cable burial between wind turbine generators with regards to both 0.5m minimum burial and caveated for use of rock / concrete mattress protection in areas of hard ground. We do not know at this stage from the survey work carried out by the applicant how successful they will bury cables (i.e. cable burial RA not visible at this stage). Drawing upon lessons learned and experience from other offshore windfarms we know there are hard areas of ground to the west within the Mona and we would anticipate that burial would not be achieved. This has been the case with Seagreen windfarm recently commissioned for which one of our fishing vessels fished within the windfarm this year. With unforeseen circumstances and poor construction planning, up to 49,000 tons of rock was dumped over cables, well in excess of the consented tonnage. The end result at Seagreen (as shown below) is that significant lengths of inter array cable layout is unburied and therefore our vessel would not tow Scallop	As described within Volume 1, Chapter 3: Project Description (APP-050), all subsea cables will be buried below the seabed wherever possible and protected with a hard-protective layer (such as rock or concrete mattresses) where adequate burial is not achievable. Depending on the Cable Burial Risk Assessment (CBRA), it is expected that the offshore export cables and interconnector will be buried to a target depth of 1 m, with a maximum burial depth of 3 m and a minimum burial depth of 0.5 m. The maximum percentage of export and interconnector cable route requiring cable protection is 20%. Inter-array cables will be buried to a target depth of 2 m with a maximum burial depth of 6 m and a minimum burial depth of 0.5 m. The maximum percentage of the inter-array cable route requiring cable protection is 10%. The CBRA will be undertaken post-consent and will inform cable burial depth which will be dependent on ground conditions as well as external risks. The use of cable protection beyond the limits assessed in relevant chapters of the Environmental Statement is controlled within the draft DCO (C1 Draft Development Consent Order F04) and expected to be controlled in the standalone marine licence. Within the Draft DCO, Table 4 in Schedule 14 sets a maximum limit on cable protection volume and area for inter-array and interconnector cables within the Mona Array Area. These limits are based on protection of up to 10% and 20%

Reference	Written Representation Comment	Applicant's response
	fishing gear over. With regards to Mona there is harder ground to the west and there are also some 7 existing sub-sea cables which pass through the Mona area which our vessels already have to negotiate and avoid snagging. It is anticipated that a similar situation to Seagreen could arise with Mona with dumping of rock on the areas of hard ground and where the cable array will cross existing subsea cables. We are disappointed that the ambitions of the co-existence plan do not go far enough with a shallow target burial depth and open book in terms of 'protection' where burial cannot be achieved. We have seen EIA documents of other developments such as Seagreen and Moray East and when we have fished within them we find the end result is that burial is generally unsuccessful, hence why we are cautious with this proposed development.	of total cable length being protected for inter-array cables and interconnector cables respectively. Similar limits on footprint and area of cable protection are expected to be set out in the standalone marine licence for the export cables. The Applicant will not be able to exceed these limits without variation to the deemed marine licence/standalone marine licence, which the licencing authority would likely consult on with relevant stakeholders. Additionally, Condition 27 in Schedule 14 of the draft DCO requires that the Applicant provides the licensing authority and the JNCC with a report setting out details of the cable protection and scour protection used for the authorised scheme including the volumes of scour and cable protection used. The Applicant acknowledges that the WCSP have highlighted that the CBRA is not visible at this stage. The Applicant maintains that it is not possible to effectively carry out a CBRA which encompasses the full range of project design options which have been included in Maximum Design Scenario (MDS). To be effective, the CBRA must be based upon final cable routes, which will be determined post-consent and is subject to the acquisition of geotechnical and geophysical data and the completion of detailed project design. As such, the burial depths stated in Volume 1, Chapter 3: Project Description (APP-050) can only be indicative at this stage. Prior to any construction activities commencing, an offshore construction method statement (CMS) which includes a cable specification and installation plan (CSIP) incorporating a CBRA will be developed and submitted to the licencing authority for approval prior to commencement of construction. Development and adherence to the offshore CMS is secured within the deemed marine licence under Condition 18 in Schedule 14 of the draft DCO (C1 Draft Development Consent Order F04) and expected to be secured within the standalone marine licence. The Applicant notes the cable exposures at other offshore wind farms within the East Irish Sea and for other UK projects which have been highlighted by the WCSP. The Mona Offshore Wind Project has committed to monitoring of cables and their burial status to reduce snagging risk, which will be included in the Offshore CMS. Within the Outline FLCP (APP-198) the Applicant has also committed to the use of guard vessels should cables become exposed, which will ensure navigational safety and minimise the potential risk of gear snagging posed by exposed cables until such risks have been mitigated.
REP1-081.8	A further concern of the burial aspect of the development concerns the 0.5m minimum burial target and the risk of exposure. This is since cables buried within a sandy and gravelly substrate (which is typical across the central extents of Mona) are at risk of becoming exposed very quickly following construction. For instance, there are a number of exposed lengths of existing telecom cable already across the Mona proposal area. There is further vast evidence of this nearby (10miles southeast) at Gwynt y Mor OWF (commissioned 2015) in a near identical substrate, whereby in 2021 a notice to mariners was issued, including the statement "a significant number of array cable exposures are still being reported. Due to the mobile nature of the seabed within the wind farm boundary these cable exposures are subject to change and may develop in areas where there were none previously". Should Mona be constructed, it is inevitable that cables only buried 0.5m would become exposed quickly following construction. Exposed lengths would not only be unsafe to fish/tow over but they may encroach on corridors within the area which are left to fish.	
REP1-081.9	The final flaw of the coexistence plan concerns the fundamental Scallop Mitigation Zone which is based upon us providing coordinates to the applicant (Figure 1.56, Doc	The Applicant acknowledges the WCSP's comment regarding the indicative size of the SMZ within the Mona Array Area (REP1-081.9) and notes that this differs from the more positive feedback that was received during the project design update

Reference	Written Representation Comment	Applicant's response
	reference F6.6.1). It is noted that the Scallop Mitigation Zone corridor as it stands is some 3.2km in width, however is only some 35% of what we communicated to the applicant (i.e. Figure 1.56, F6.6.1). If Figure 1.56 of Doc reference F6.6.1, was presented as the Scallop Mitigation Zone within Mona with a 5-6km corridor, we would perceive this as more proactive level of coexistence. Our understanding of the current proposal is that true coexistence and the Scallop Mitigation Zone has been tightened as a consequence of the developer choosing not to utilize the eastern extents of the original lease area due to poorer wind yields. This is a disappointing justification given that there are windfarms to the east of Mona in operation and should the applicant have developed to the east, would not have encroached upon valuable fishing ground. Also essentially, Section 1.3.6.1 also suggests that the Scallop Mitigation Zone will be a let down to Queen Scallop fishing vessels such as ourselves as it (a) states that the Scallop Mitigation Zone will be further refined and (b) suggests that cables will likely run through the Scallop Mitigation Zone.	meeting undertaken in September 2023 (Appendix H.21 of the Technical Engagement Plan Appendices - Part 2 (F to M) (APP-043)). At present, the SMZ covers an approximate total of 37% of core queen scallop grounds located within the Mona Array Area. The Applicant confirmed in Response to Hearing Action Points F01 (REP1-012) following Issue Specific Hearing 2 that the indicative SMZ presented in figure 1.3 of the Outline FLCP (APP-199) is approximately 57 km^2. The Applicant will commit to maintaining the SMZ at 57 km^2 by including this commitment within an update to Table 1.2 of the Outline FLCP (APP-199) at Deadline 3.. Volume 2, Chapter 6: Commercial fisheries (APP-058) has acknowledged the significant importance of scallop fishing in the vicinity of the Mona Array Area and Offshore Cable Corridor. Enabling co-existence is a key aim underpinning the Applicant's commitments to not close the entire development area during construction, the SMZ and the orientation and spacing of infrastructure (as set out in the Outline FLCP (APP-199)). During the construction phase, it will be possible for fishing activities to continue within those parts of the Mona Array Area where construction is not being undertaken. During the operations and maintenance phase, the measures adopted as part of the Mona Offshore Wind Project, such as the SMZ, minimum infrastructure spacing of 1,400 m and roughly north-to-south alignment of wind turbine rows (as set out in the Outline FLCP (APP-199)), will provide the space for continued fishing within the Mona Array Area and fishing vessels will also be able to transit through this area.
REP1-081.10	In general the Coexistence Plan offers a solution for coexistence with the greatest measures including 1400m turbine spacing, a 3200m Scallop Mitigation Zone and north to south rows of WTGs and cables. There are however too many caveats in the document and lacking in commitment to the Scallop industry who have enjoyed fishing on this ground for decades. As a result we anticipate the proposal to have a moderate or major effect on our operations and the next section justifies If consent is granted then measures need to be enhanced in regards to : • A deeper cable burial target than 0.5m, • Widen the Scallop Mitigation Zone by some 1-2km since the current Scallop Mitigation Zone is disappointingly not wide enough and only a portion of what was communicated as the most prominent fishing grounds for Queen Scallops. The document suggests the Scallop Mitigation Zone is indicative and will be refined which makes us further cautious about what the end result shall be. There needs to	

Reference	Written Representation Comment	Applicant's response
	be a real commitment in this regard • A commitment to not take cables through the Scallop Mitigation Zone. If the recommendations are adopted as above we would envisage the overall negative effect on us as a receptor would be reduced.	
REP1-081.11	3.2 Other practicality considerations Weather The Commercial fisheries chapter and coexistence plan does not necessarily factor enough in the impact that poor weather will have on decision making fishing vessel skippers. From experience, most skippers will only enter windfarms to fish when the weather conditions are ideal. The Mona project area is situated on top of autumn and winter Queen and King Scallop fisheries as dictated by the seasonality of the product, i.e. fished when yields are at their peak in the autumn and winter months. As a result fishery management strategies and closed seasonal seasons have been in implemented for years accordingly to account for this seasonality. We expect Mona to have a High level of magnitude on us a receptor as presently skippers will fish in slightly poorish weather, however will be hesitant to enter with the hazards imposed by a windfarm. It is particularly important access these grounds in the winter when the product and yield is very high in line with higher fish prices ahead of the busy Christmas period.	The Applicant has assessed the potential impacts of the Mona Offshore Wind Project on navigational safety for fishing boats within Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). This included risk to vessels engaged in fishing within the Mona Array Area or along the Mona Offshore Cable Corridor, and fishing vessels on transit passing adjacent to or through the Mona Array Area and included consideration of adverse weather conditions. The risk of collision and allision with wind turbines or offshore substation platforms, as well as vessels operating within or adjacent to the Mona Array Area was identified as part of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) in hazards 3, 4, 8, 17 and 25. These were discussed during the hazard workshop undertaken in October 2024, which was attended by representatives from fishing organisations (Anglo Northern Irish Fish Producers Organisation (ANIFPO) and SWFPA) and these hazards were scored as Medium Risk – Tolerable if As Low as Reasonably Practicable (ALARP). Section 1.8.5 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) discusses impacts to fishing, noting issues surrounding "Spatial Squeeze" and reflected the levels of fishing activity detected as part of the vessel traffic surveys reported in Section 1.6 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). These hazards recognised that causes could include the presence of infrastructure and therefore reduced sea room, adverse weather conditions and increased vessel traffic amongst others. On the basis that crews of fishing vessels are trained, the vessels are equipped with navigational equipment and the spacing between Mona Offshore Wind Project infrastructure exceeds the spacing of other offshore wind farms in the UK, these risks were determined to be ALARP. Similar conclusions were reached within the Cumulative Regional Navigation Risk Assessment presented in Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). The shipping and navigation assessment was undertaken with a Maximum Design Scenario (Table 7.16 of Volume 2, Chapter 7: Shipping and navigation APP-059) with 90% of the length of inter-array cables buried to a minimum depth of 0.5 m which would greatly reduce the risk of snagging of fishing gear. Where cables are not sufficiently buried, the Mona Offshore Wind Project would address this with additional mitigation. With mitigations proposed by the Mona Offshore Wind
REP1-081.12	General navigation We have concerns about the proposal's impacts on navigation and also cumulatively in mind of other windfarm proposals. From our experience of fishing in Seagreen Windfarm this year for King Scallops the fishing vessel skipper, in addition to concentrating on fishing had to secure the safety of the vessel in terms of : - 1. Other fishing vessels operating within the 'alley ways' between the cable routing between WTGs, 2. Other normal marine traffic	

Reference	Written Representation Comment	Applicant's response
	3. Windfarm survey vessels on site at the time – overtrawl 4. Guard vessels 5. Anchored Acoustic monitoring equipment 6. Wind turbine generators 7. Inter-array cables The current coexistence plan does offer greater scope for coexistence compared to Seagreen on paper; however we expect the windfarm to not successfully bury all cables and resort to rock dumping or mattress protection. This would result in to our vessels and others having little confidence to tow over the cables, and subsequently lead to a heightened navigation risk. The plotter screen taken from one of our fishing vessels (below) this year within Seagreen shows the reality of a fishing vessel operating between cable routing and highlights the squeezing and therefore heightened risk of collision between fishing vessels. As discussed in the previous section, with poorer weather factored in and fishing vessels desperate to catch in peak season in the Irish Sea in the run up to the busy Christmas market, this risk is even more significant. A review of the Navigation section of the ES plays down the significance of this. The Mona proposal also raises concerns for transiting to and from ports such as Kirkcudbright when not fishing and also during emergency situations, e.g. airlifting of casualties, engine failure scenarios. This is particularly the case in terms of the cumulative impact of up to a total of 4 offshore wind farms proposed for the Irish Sea within current navigation routes between the fishing grounds and Kirkcudbright.	Project in place, the risk of snagging of fishing gear was assessed as minor adverse in Section 7.9.11 of Volume 2, Chapter 7: Shipping and navigation (APP-059). An assessment of impacts to Search and Rescue was undertaken in Section 7.9.6 of Volume 2, Chapter 7: Shipping and navigation (APP-059) in compliance with Maritime and Coastguard Agency requirements in MGN654 Annex 5. The assessment concluded that with commitments to two lines of orientation and minimum spacing between wind turbines and offshore substation platforms, safe and effective Search and Rescue could still be conducted within and around the Mona Offshore Wind Project, and other cumulative adjacent projects.
REP1-081.13	4. Fish and Shellfish Ecology As a receptor which will be directly impacted by Mona, we are of the opinion that access to fish is of one course one moderate/major impact, however may not be as concerning to us as the potential for Queen Scallop habitat loss. Of Doc ref F2.3, page 201 we strongly disagree with paragraph 3.11.5.14, that the cumulative effect on Queen	The Applicant acknowledges this the WCSP's concerns and related points in REP1-081.1. As outlined in the Applicant's response to REP1-081.2 and REP1-081.3 above, the available research on queen and king scallop responses to impacts including temporary habitat loss and disturbance, increased suspended sediment concentrations, and long term habitat loss has been assessed within Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), with these species included specifically as important ecological features and their higher sensitivity to

Reference	Written Representation Comment	Applicant's response
	and King Scallop biomass is "minor adverse", and such an assessment without any science is simply an assumption. Furthermore Table 3.34 concludes that there will be no ongoing monitoring required with regard to the effect that the project shall have on fish and shellfish. We view this as seriously irresponsible as there is simply no science to what impact a windfarm development is on Queen Scallops, let alone probably the largest Queen Scallop commercial fishery in Europe.	each impact considered in the conclusion. For each impact (both for the project alone and cumulatively with other projects and plans), the overall assessment concluded no significant impact (minor adverse significance) in all project phases, with no further specific mitigation measures required beyond the measures adopted as part of the project (in line with 2022 CIEEM guidance (CIEEM 2022)). Impacts to queen scallop from temporary habitat loss/disturbance, long term habitat loss and the potential for impacts on queen scallop from deposits of resuspended sediments during construction are presented in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), sections 3.9.2, 3.9.5 and 3.9.4 respectively. Due to the nature of the sediment disturbance and the relatively rapid reintegration of disturbed sediments into the existing sediment transport regime (see Volume 2, Chapter 1: Physical processes (APP-053) and Volume 6, Annex 1.1: Physical processes technical report (APP-086), suitable sediment is anticipated to be available to support spat settlement and habitation by queen scallop following cessation of construction activities, as outlined in paragraph 3.9.2.19 onwards in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). Areas subject to resettlement of significant thicknesses of suspended sediments during construction activities are expected to be close to the source, with this sediment material reintegrated into the sediment transport regime within a few tidal cycles. This reduces the potential for long term changes to the substrate/habitat composition, as discussed within paragraph 3.9.4.16 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). Further details of the modelled deposition of suspended sediments are presented within Volume 2, Chapter 1: Physical processes (APP-053) and Volume 6, Annex 1.1: Physical processes technical report (APP-086). As outlined above, based upon the assessment conclusions resulting in no predicted significant effects to queen and king scallop, no mitigation or monitoring is proposed beyond the measures outlined within the assessment for fish and shellfish ecology (Volume 2, Chapter 3: Fish and shellfish ecology; APP-055) and commercial fisheries (Volume 2, Chapter 6: Commercial fisheries; APP-058).
REP1-081.14	Windfarms have been developed on King Scallop beds around the UK as we have fished in and have shown survivability. King Scallops however are a different species and so far in the short term, their sensory structures appear to have shown to resist the effects of EMPS, construction noise, turbine vibrations etc; however there is no science / no one knows yet what wind farms will have one Queen	The Applicant acknowledges this response. Temporary habitat loss/disturbance associated with the Mona Offshore Wind Project (including that associated with cable burial) is assessed within section 3.9.2 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), and the effects of sediment deposition as a result of increases in suspended sediments

Reference	Written Representation Comment	Applicant's response
	Scallops. The coexistence plan makes an effort to leave a portion of the Queen Scallop ground within Mona free of development (Figure 1.3, doc ref J13), however we have serious concerns that the disturbance and alteration to the seabed to the east of this corridor shall detrimentally affect the unfished areas considered as nursery/spawning fishing ground by the fishermen. The following risks are as such : - • Cable burial and change of substrate no longer supporting congregations of Queen Scallops and commercially viable levels • Fixed Turbine disturbance to currents altering plankton distribution and larval dispersal over the Queen Scallop grounds, as indicated as a possible effect by Barbut et al., 2020); • Local tidal energy losses of turbines and resulting sedimentation effects (Gill A.B et al., 2020) • Fixed turbines & cable rock dumping creating artificial reefs encouraging invasive species such as starfish to explode in population (Gill A.B et al., 2020)	and associated deposition are assessed within section 3.9.4 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). Due to the nature of the sediment disturbance and the relatively rapid reintegration of disturbed sediments into the existing sediment transport regime (see Volume 2, Chapter 1: Physical processes (APP-053) and Volume 6, Annex 1.1: Physical processes technical report (APP-086)), suitable sediment is anticipated to be available to support spat settlement and habitation by queen scallop following cessation of construction activities, as outlined in paragraph 3.9.2.19 onwards in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). Further, during cable burial, sediment material is proposed to sidecast immediately adjacent to the site of removal to ensure it can be readily integrated back into the existing hydrodynamic regime (Volume 2, Chapter 1: Physical processes (APP-053)). Areas subject to resettlement of significant thicknesses of suspended sediments during construction activities are expected to be close to the source, with this sediment material reintegrated into the sediment transport regime within a few tidal cycles. Further details of the modelled deposition of suspended sediments are presented within Volume 2, Chapter 1: Physical processes (APP-053) and Volume 6, Annex 1.1: Physical processes technical report (APP-086). The area to the east of the Mona Offshore Wind Project is not expected to be subject to disturbance as a result of the Project, and as this area is considered a nursery/spawning area which is unfished, spawning and nursery in this area is expected to be unimpeded by the Project. As shown within Figure 1.2 of Volume 6, Annex 2.1: Benthic subtidal and intertidal ecology technical report (APP-087), broadscale habitat mapping indicates the presence of coarse and mixed substrate beyond the boundaries of the Mona Offshore Wind Project, suggesting that suitable habitat is available within the region adjacent to the Project to support recovery of queen scallop into areas which are subject to temporary habitat loss/disturbance. Modelling of the tidal regime presented within Volume 6, Annex 1.1: Physical processes technical report (APP-086), and assessed within Volume 2, Chapter 1: Physical processes (APP-053) concluded that there would be a maximum of 20% reduction in tidal current speed within 50 m of installed structures, resulting in a negligible adverse impact, which is not significant in EIA terms. The localised hydrodynamic effects resulting from the presence of infrastructure would result in minimal disruption to the distribution of plankton and the dispersal of queen scallop larvae.

Reference	Written Representation Comment	Applicant's response
		In addition, modelling of the distribution of increased suspended sediments and associated sediment deposition as a result of the Mona Offshore Wind Project is presented in Volume 6, Annex 1.1: Physical processes technical report (APP-086), demonstrating the localised sedimentation predicted in areas of sediment disturbance and discharge. Further, the modelling predicts that any sedimentation as a result of construction activities at Mona Offshore Wind Farm will be rapidly integrated into the existing sediment transport regime within a few tidal cycles, resulting in no significant effect. The increased risk of introduction and spread of invasive non-native species is assessed within section 2.9.7 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054). The assessment predicted a minor adverse effect to existing habitats which is not significant in EIA terms, with management of potential for invasive non-native species through a Biosecurity Risk Assessment and an Invasive Non-native Species Management Plan (as presented in Table 2.19 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054). The impact of colonisation of introduced artificial hard substrates (such as cable protection and other project infrastructure) is assessed within section 2.9.6 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) with regards to changes in benthic habitats and species composition and in section 3.9.7 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). The assessment predicted a minor adverse significance of effect which is not significant in EIA terms. These conclusions are based upon the localised nature of the effect, which is expected to be restricted to the immediate vicinity of introduced hard substrates.
REP1-081.15	Due to the risks identified above to the Queen Scallop habitat, which are evidenced by what has been observed in other offshore windfarms and literature we cannot support the minor adverse scoring provided in the Fish and Shellfish Ecology chapter.	The Applicant notes this concern. As outlined in the Applicant's response to REP1-081.2, 3, 13 and 14 above, current scientific evidence and site-specific modelling have informed the assessment presented within Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). The assessment predicts non-significant effects to king and queen scallop, due to the localised nature of the effects and the highly dynamic hydrodynamic and sediment transport regimes which suggest that temporary habitat changes through seabed disturbance and deposition of suspended sediments will be short-lived, with rapid reintegration into the existing regimes following the cessation of disturbance activities in any given area.
REP1-081.16	Further research should be undertaken before a potential catastrophe could occur in altering the Queen Scallop habitat which we rely on. Across the UK many windfarms have been constructed on shallow banks that support King	The Applicant notes these concerns. The area to the east of the Mona Offshore Wind Project is not expected to be subject to disturbance as a result of the Project, and as noted in the Applicant's response to REP1-081.14 above, this area is considered a nursery/spawning area which is unfished, therefore spawning and

Reference	Written Representation Comment	Applicant's response
	Scallop dredging; of these the King Scallops are recruited from other areas of unfished seabed. Mona (and Morgan) proposals would be unique as they would capture the sandy gravelly ground where both spawning of Queen Scallops occurs and where they are recruited and subsequently fished year after year.	nursery in this area is expected to be unimpeded by the Project. As shown within Figure 1.2 of Volume 6, Annex 2.1: Benthic subtidal and intertidal ecology technical report (APP-087), broadscale habitat mapping indicates the presence of coarse and mixed substrate beyond the boundaries of the Mona Offshore Wind Project, suggesting that suitable habitat is available within the region adjacent to the Project to support recovery of queen scallop into areas which are subject to temporary habitat loss/disturbance. Further, as outlined in the Applicant's response to REP1-081.2, 3, 13, 14 and 15 above, impacts to queen scallop habitat through seabed disturbance and the deposition of suspended sediments are predicted to be short-lived, with disturbed sediments rapidly reintegrated into the existing sediment transport regime and redistributed, with any longer term sediment changes as a result of sedimentation predicted to be highly localised within the immediate vicinity of installed infrastructure.

2.17 Davis Meade Property Consultants

Table 2.17: REP1-082 – Davis Meade Property Consultants

Reference	Written Representation Comment	Applicant's response
REP1-082.1	Dear Sirs, 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.	The Applicant notes the submission and is aware of the parties represented by Davis Meade Property Consultants (DMPC) as we continue to negotiate Heads of Terms.
REP1-082.2	The following generic points apply to each of our clients -: **a. Proposed reinstatement methods** Regarding reinstatement it is vital that topsoil and subsoil together with any boulder clay (as appropriate) are kept separate and are not removed from our clients land .In addition it is important that the top soil is duly protected from contamination (including measures carried out in respect of routine weed control) and reinstated in sequence of bolder clay, subsoil followed by top soil together with surface stones removed. Then subsoiling will be considered necessary with the aim of addressing compaction (for the benefit of natural drainage) and the land cultivated (together with lime applied -if a soil analysis deems appropriate) and seeded (with a grass seed mixture approved in advance by our client) and relevant compound fertilizer applied with the affected land being protected by temporary livestock (cattle & sheep) proof fencing until the new sward is duly established.	The Applicant acknowledges the importance of correct soil handling, storage and reinstatement procedures and has prepared an Outline Soil Management Plan (J 26.8 F02) to manage the impacts of the Project on Soil Resources, as far as possible. The Outline Soil Management Plan sets out measures to control the stripping, storage, restoration and aftercare of soils during the construction of the Project in line with best practice industry standards within the Defra Code of Practice for the Sustainable Use of Soils on Construction Sites (2009). The Outline Soil Management Plan (J26.8 F02) also sets out the commitments relating to Agricultural Liaison Officer (ALO) presence and controls on site to ensure the correct working practices are adhered to and details the proposed aftercare and handover plan, which is the commitment to agree an aftercare plan with the landowner covering relevant cultivations to be undertaken relating to the soils and conditions, seed mixtures for initial crop establishment and reviewing of the soil samples to determine the correct nutrient, lime and fertiliser applications. This also extends to a review after the first 12 months of aftercare to monitor the restoration and identify further works to bring the soil back to the former use in accordance with Article 29 of the draft Development Consent Order (C1 F04).
REP1-082.3	b. **Land Drainage schemes /remediation** It is fundamental that all land drainage schemes applicable to the affected persons' properties are agreed in advance (each party acting reasonably). In the event of agreement not being consensually achieved then it is considered the matter should be determined by means of dispute resolution involving an independent expert.	The Applicant acknowledges the requirements for appropriate drainage across land affected by the project. To that end a full drainage survey and pre scheme design will be undertaken prior to the construction of the project as per the commitments under the Outline Construction Surface Water Drainage Plan (J26.6 F02). The Applicant has set out within the heads of terms that it is willing to cover appropriate and reasonable fees for the affected parties to instruct their own independent drainage expert to review those designs. Those heads of terms also include for dispute resolution provisions.

Reference	Written Representation Comment	Applicant's response
REP1-082.4	**c. Surface intrusive apparatus** Detailed information as to proposed location & dimension of surface intrusive apparatus such as manholes is required at the earliest opportunity, pre–installation (with such apparatus to be kept to the minimum and sited to result in the least disruption to farming operations, being located as close as practicable to existing boundaries).	The Applicant has set out the maximum sizes of any above ground infrastructure (Surface intrusive apparatus) within the Environmental Statement, Volume 1, Chapter 3: Project Description (APP-050). This has also been included into the heads of terms being negotiated. The exact locations of the final above ground infrastructure will be determined following detailed design.
REP1-082.5	**d. Pre- Scheme 'enabling works'** No pre scheme enabling works (including, for instance, felling of trees, removal of hedges ,drainage operations etc) are deemed appropriate (unless agreed in writing in advance by our clients) prior to construction Notices having been served to commence the actual scheme operations.	The Applicant notes the submission. The Applicant is negotiating within its voluntary agreements an agreed position on 'enabling works' that may be carried out ahead of the main construction works. This is industry standard approach and is included to allow certain works to be carried out at optimum times, the extent of these works are being negotiated and are limited to works subject to seasonal restrictions, environmental mitigation works, fencing only where the fence is to ensure boundary security. The right to undertake onshore site preparation works is included within the draft Development Consent Order, however voluntary agreements with land interests offer more specific control over carrying out these works.
REP1-082.6	**e. Post scheme access routes** It is advocated that such routes to access the cables and associated infrastructure should be agreed voluntarily between the Applicant and affected persons to undertake future maintenance, repairs and replacement of on-shore apparatus, with each party acting reasonably .	The Applicant has included within the Order Limits operational access routes, Work No. 38 shown on the Works Plans (AS-003), for which it is seeking powers to acquire these rights as a backstop to protect the project. However, the Applicant is at advanced stages of negotiations with affected parties and is negotiating voluntary agreements which include the provision for post construction operational access.
REP1-082.7	**f. Compulsory acquisition of rights** Given the limited anticipated operational 'life time' of the offshore wind farm apparatus it is considered that rights for the installation of the on-shore infrastructure should be granted for a fixed term period of no greater than 99 years (instead of in perpetuity).	As is industry standard, the Applicant has included within its application Compulsory Acquisition powers to protect the delivery of the project. These rights as set out in paragraph 1.10 in Statement of Reasons (APP-029) will be in perpetuity and the Applicant is seeking the equivalent rights within the voluntary agreements which is a standard practice across the industry.

Reference	Written Representation Comment	Applicant's response
REP1-082.8	**g. Public Utility apparatus** It is considered appropriate that terms including also routes for, the installation of any new, temporary of diverted, public utility apparatus (as appropriate) are voluntarily agreed between the affected persons and the subject Utility provider (all parties acting reasonably). Again, in the event of agreement not being consensually achieved then it is considered the matter should be determined by means of dispute resolution involving an independent expert.	The Development Consent Order provides for the diversion and laying of utilities and services, and the Applicant will be subject to the relevant Protective Provisions.

2.18 Martyn Hussey and Margaret Hussey

Table 2.18: REP1-085 and REP1-086 – Martyn and Magaret Hussey

Reference	Written Representation Comment	Applicant's response
REP1-086.1	1.0 Introduction Whilst we support the ambition for a Low Carbon renewable energy solutions and the drive for net zero, this proposed development will have significant effects on us personally, which are set out in Section 2 along with some points for clarification and a summary (Section 2.4). Additional general comments regarding the project as a whole are set out in Section 3. We have sought resolution with the applicant prior to this submission as we recognise that in developments of National Significance it is the Planning Inspectorate and Secretary of State's role to examine in the public interest and not necessarily private interest, however we were advised by the applicant to continue to engage with the consenting process being designed to explore fully and independently the application, including the efficacy of proposed mitigation. We trust that you will consider our particular personal concerns with fairness and openness. It has been difficult to fully digest the 1000's upon 1000's of technical pages submitted by the applicant in support of their scheme without independent professional advice, which for individuals like ourselves is cost prohibitive. We therefore hope we have not misinterpreted any of the information or misunderstood the correct process for raising these issues and concerns.	Thank you for providing a Written Representation to the Examination of the Mona Offshore Wind Farm Project at Deadline 1. The applicant acknowledges your comments and provides response to the points raised below.
REP1-086.2	Section 2 Personal Impacts 2.1 Noise 2.1.1 Base Line Examination Library Reference APP-178 Document Reference F7.9.1 dated February 2024. Base line noise surveys are important as they are used to inform the assessment of impacts for construction and operational activities. It is recognised by the applicant, both in PEIR documents and base line noise surveys that we are a low noise climate due to the rural nature of the area we live in. In order to establish a baseline for Tyddyn Meredydd,	The Applicant refers to the response given to Reference REP1-086.7 below.

Reference	Written Representation Comment	Applicant's response
	survey reference LT20 was carried out with equipment placed at the Northern boundary edge of our property, from 15:15 hours on 14th September 2023 until 11:05 hours on 19th September 2023. Copy of the graphical data taken from Appendix B20. To which we make the following observations: a) There appear to be outliers (peaks) at the start of each day and a step change in increased dB levels on the final day.	
REP1-086.3	b) Some rain fall and maximum wind speeds of around 1.5m/s are recorded.	
REP1-086.4	Commenting further: a) The peaks at start of day where noise levels increase by around 15dB (occurring between 06.00 to 06.30) appear unique to this site as no similar results were recorded at Maes Cefn or Plas Hafod, being the closest survey stations at the time.	
REP1-086.5	The applicant states that any periods where precipitation events or wind speeds >5m/s then the data was omitted during analysis so an assumption is made that for the periods where rain was recorded that they have been omitted, however the wind speeds noted appear open to question: • Weather results recorded were from equipment positioned at Maes Cefn which is on the opposite side of a hill, to the West, sitting between our properties and it is common to experience different wind conditions	
REP1-086.6	• The wind speed results recorded do not reflect that which we observed at the time nor Meteorological Office data. o We noted it being very gusty on the 19th September all morning o Summary of Meteorological Office data from Rhyl No2 station (4-5Km NE from Tyddyn Meredydd) is shown below. Date - Daily rainfall mm - Daily Mean Wind speed Kn - Daily Max Gust Kn - Time of Max gust 14/9/23 - 7.8 - 4 - 21 - 23:53	

Reference	Written Representation Comment	Applicant's response
	15/9/23 - Tr - 3 - 10 - 17:13 16/9/23 - 2.8 - 3 - 15 - 18:34 17/9/23 - 15.2 - 3 - 14 - 11:08 18/9/23 - 7.8 - 8 - 26 - 17:02 19/9/23 - 10.2 - 12 - 36 - 07:3 Although the Meteorological Office wind speed data is recorded in Knots (5m/s = 9.7Kn) it does support our observations and would reasonably explain the step change in increased recordings on the last day.	
REP1-086.7	• It is also worth noting that on the penultimate day (18/9/23) where daily mean wind speed of 8Kn and maximum gust of 26Kn are recorded by the Meteorological Office that these wind speeds do not appear to be reflected in the weather data recorded by the applicant. The step changes early each morning have now been explained by the applicant with the frequencies recorded and time being most likely attributed to bird noise, however high and gusty winds on the final morning would logically explain the increased noise levels recorded that day and that, if omitted, would reduce the base line dBA figure by several points. Therefore on this basis we consider the baseline noise levels published for our property to have been over stated.	The Applicant acknowledges the increase in noise levels measured at Tyddyn Meredydd, survey reference LT20 on 19th September 2023 when compared to those measured during the remainder of the survey. As shown in Appendices B9 to B19 of the ES Volume 7 Annex 9.1 (APP-178), the increase in measured noise levels during this period was also observed at all other survey locations, L9 to L19 inclusive. Further analysis of the data at all locations has identified that these increased levels coincide with prolonged periods of rainfall during this period. However, the Applicant confirms that the baseline sound levels survey results presented in Table 9.14 of the ES Volume 3 Chapter 9 (APP-072) have been derived by removing the influence of the increased levels measured on 19th September through: a) Identifying the residual sound level for each day and night of the survey period and presenting the lowest representative values in Table 9.14 b) Identifying the representative background sound level in accordance with the methodology set out in paragraphs 9.5.1.4 and 9.5.1.5 of ES Volume 3 Chapter 9 (APP-072) The Applicant thus considers the approach it has taken to be appropriate and robust and the baseline sound levels reported to be suitably representative of the existing acoustic environment at Tyddyn Meredydd.
REP1-086.8	2.1.2 Construction Noise Examination Library Reference APP-179 Document Reference F7.9.2 dated February 2024 and Examination Library Reference APP-072 Document Reference F3.9 dated February 2024 Modelling software has limitations as it is only ever as good as the data and assumptions inputted. An assumption used in the model (document F7.9.2 section 1.5.1.7) is that an	The Applicant confirms that paragraph 1.5.1.7 of ES Volume 7 Annex 9.2 (APP-179) details the inclusion of a 2.4 m high barrier around the perimeter of the temporary construction compounds. The 3D acoustic model was updated to remove the barriers and the construction noise impacts presented reflect the construction noise levels in the absence of the barriers but include the mitigation measures detailed in Table 1.13.

Reference	Written Representation Comment	Applicant's response
	acoustic barrier of height 2.4m has been included around the perimeter of construction activity.	This update was not reflected in ES Chapter 7 Annex 9.2 (APP-179). The errata (document reference S_PD_1 F03) has been updated to note that paragraph 1.5.1.7 should be removed.
REP1-086.9	• This assumption is questionable as it would surely be impractical to expect that such an acoustic barrier will be in place at all times between ourselves (including other receptors for that matter) and all construction activities throughout the several years of construction?	The Applicant refers to the response given to Reference REP1-086.8 regarding barriers.
REP1-086.10	The onshore substation itself will grow to a height of 15mts plus platform height with construction equipment such as cranes etc. even higher, the installation of an acoustic barrier between these activities and our property (or indeed other receptors) would therefore seem unrealistic.	As noted in paragraph 1.5.1.6 of the ES Volume 7 Annex 9.2 (APP-179), construction activities likely to be concentrated within one area, such as those undertaken within the construction compounds and the substation construction works, have been modelled using 3D acoustic modelling software (SoundPLAN v8.2). The construction plant has been assumed to be situated within these construction compounds and has been modelled along the boundary closest to receptors to represent the maximum design scenario. Although it is acknowledged that the source of the sound from each construction plant item will vary, the modelling has been undertaken based on an assumed average sound source height of 2 m above local ground level. This is because the noise emitting element of the plant items is typically situated closer to the ground (e.g., the engine of a crane). Consideration has been given to the noise impacts whilst plant is both idling and undertaking construction activities.
REP1-086.11	Even if, any acoustic barrier was possible then due to the topography between Tyddyn Meredydd and many of the construction activity sites would negate the effectiveness.	The Applicant refers to the response given to Reference REP1-086.8.
REP1-086.12	It is unclear as to what distances from each relevant construction activity for Tyddyn Meredydd have been used in the modelling as these would be a significant influencer. Statements in APP-072 Document F3.9 section 9.5.3.5 that:- o Some works are assumed to be spread along sections of the onshore cable corridor. Construction noise levels for these works have been calculated at varying distances from the boundary of the temporary construction compounds	The location of the temporary construction compounds in the vicinity of Tyddyn Meredydd are shown on drawing number 12079-0712-01 in ES Volume 7 Annex 9.2 (APP-179). The Applicant refers to the response given in REP1-086.10 regarding the location of the plant modelled within temporary construction compound areas.
REP1-086.13	The use of the wording temporary construction compounds implies lay down areas and therefore clarification would be	

Reference	Written Representation Comment	Applicant's response
	appreciated as to actual distances used in the modelling for each activity in relation to our property.	
REP1-086.14	On this basis and the assumptions used in the modelling make it open to doubt and questionable in assessing the true impacts for Tyddyn Meredydd.	The Applicant refers to the responses given to References REP1-086.8 and REP1-086.10 and REP1-086.13
REP1-086.15	When discussing acceptable threshold values for environmental noise, the applicant refers to the World Health Organisation on one hand and then BS 5228-1 2009+A1:2014 on the other where: BS 5228 states Threshold values of 65dB for daytime (07.00 – 19.00) and 55dB for evenings (19.00 – 23.00) However World Health Organisation guidelines don't differentiate between daytime and evening with just a daytime limit of 55dB (07.00 – 23.00) It is noted that the applicant selects the more lenient limit for daytime threshold values from BS 5228 in assessing whether noise levels generated by its site activities are deemed significant. For the predicted noise levels from various construction activities and their impact on human receptors/properties we make the following comments:	The Applicant confirms that the impact criteria for construction noise have been determined in accordance with the DMRB LA111 and Annex E of BS 5228-1:2009+A1:2014, as noted in paragraph 9.6.2.8 of ES Volume 3 Chapter 9 (APP-072). This approach has been used to assess construction noise and vibration impacts of other Nationally Significant Infrastructure Projects including Awel y Môr Offshore Wind Farm. The WHO guideline values apply to transportation, wind turbine, and leisure activities with BS 5228-1:2009+A1:2014 being the industry standard for the assessment of construction noise.
REP1-086.16	• Table 9.18 in APP-072 F3.9 for construction noise criteria lists our property as only being impacted by Substation but due to our unique position within this development we will also be impacted by cable route activities.	The Applicant confirms that the groupings identified in the Table 9.18 of ES Volume 3 Chapter 9 (APP-072) indicate the location of the receptor relative to the proposed development. They have been included for ease of cross reference against the baseline sound survey location figures in ES Volume 7 Annex 9.1 (APP-178) However, the Applicant confirms that construction noise levels from all planned construction activities within 300 m of Tyddyn Meredydd, as with all receptors, have been calculated and presented in the ES.
REP1-086.17	• APP-179 F7.9.2 Appendix B lists impacts by specific construction activity:- o For Substation ground works it appears that the closer you are to the work then the quieter it will be? For e.g., we have a predicted noise level impact of 23dB whereas Pentre Mawr farm and Ysgubor EOS , both much further away have 39dB and 51dB noise impact levels respectively.	The Applicant acknowledges the difference in predicted noise levels reported. The levels reported in the results tables in Appendix B of ES Volume 7 Annex 9.2 (APP-179) are incorrect and will be updated and acknowledged in a subsequent erratum. The Applicant confirms that this error results in no significant effects and thus does not change the outcome of the assessment.

Reference	Written Representation Comment	Applicant's response
	o For Trenchless Techniques the impact for Tyddyn Meredydd listed as Negligible whereas Pentre Meredydd is Low? It is difficult to see how Pentre Meredydd is closer to this activity and so it is hard to understand why there is any difference.	
REP1-086.18	• Our experience of occasional works that have been carried out in the vicinity of our property, the likes of overhead lines, telegraph pole replacements, drainage works, bore holes as part of the applicants geological studies is that noise is noticeable and an annoyance but only for relatively short duration, whereas this development will require continuous construction activities 6 days a week over many years.	Construction noise and vibration will be controlled via the implementation of mitigation as outlined in the Outline Construction Noise and Vibration Management Plan [APP-215].
REP1-086.19	• The predicted figures quoted by the modelling appear remarkably low for some of the construction activities to what one might expect, for an e.g., transition joint bays excavation, base construction of between 33 and 39dB for Tyddyn Meredydd would imply on the face of it, that disturbance will be less than the current baseline. These types of predicted dB figures are actually more what one might experience spending the day in the local library.	The Applicant refers to the response to Reference REP1-086.17
REP1-086.20	• The predicted figures used by the applicant have been separated by breaking down all the various activities and then individually assessed, however this fails to take into account any concurrent activities and therefore cumulative impacts. We will be exposed to both underground cabling and multiple substation construction activities as part of this development at the same time.	The Applicant acknowledges that there will be concurrent works, particularly those associated with underground cabling and substation construction. Due to the variable nature of construction noise, the cumulative noise level from concurrent construction activities is generally no greater than those that arise for individual works since one construction activity generally dominates the noise climate at a receptor. Moreover, as outlined in section 1.5.1 of Volume 7 Annex 9.2 (APP-179), construction activities required to install the Mona Onshore Export Cable Corridor are likely to be transient in nature and are thus unlikely to be undertaken at a single location for any extended period of time such that the effect will become significant. The Applicant concludes that concurrent construction activities are unlikely to result in significant effects and that construction noise and vibration from all construction activities (both sequential and concurrent) will be controlled via the

Reference	Written Representation Comment	Applicant's response
		implementation of mitigation as outlined in the Outline Construction Noise and Vibration Management Plan (APP-215).
REP1-086.21	• The predicted figures do not take into account other major construction activities which will also be ongoing at the same time, the likes of National Grid extension and Pylon/overhead line works, Awel Y Môr cabling connection to National Grid, all scheduled to construct at similar timescales within relatively close proximity to our property, and so resulting in additional cumulative noise impacts	The Applicant refers to Sections 9.10 and 9.11 of ES Volume 3, Chapter 9 (APP-072) which reports the assessment of the potential cumulative effects with construction activities associated with other proposed developments. No potential cumulative noise and vibration effects arising from other ongoing projects at Tyddyn Meredydd have been identified in this assessment.
REP1-086.22	We note the applicants statement in APP-072 F3.9 item 9.9.6.1 that; Depending on the locations of the construction works and activities required, a noise monitoring strategy will be agreed as part of the Construction noise and vibration plan may be agreed upon with the relevant stakeholders to ensure compliance with the agreed threshold values. Our opinion is that noise monitoring should be mandatory during the construction phase throughout the onshore cable corridor and onshore substation site to validate modelling assumptions, predictions and allow accurate monitoring of compliance to threshold values	The specific location and duration of any required monitoring cannot be confirmed at this stage. However, The Applicant confirms that noise monitoring strategy will be agreed with the relevant stakeholders as part of the Construction Noise and Vibration Management Plan, as outlined in section 9.9.6 of ES Volume 3 Chapter 9 (APP-072).
REP1-086.23	In summarising the noise impact effects on Tyddyn Meredydd, the applicant rates as either Low or Negligible which we firmly believe is inaccurate due to the unique position of our property within the construction areas, the implausible use of acoustic barriers at all times, the impulsive characteristic of some of the activities (piling as an e.g.), lack of cumulative impact assessment and the impacts not being of a short or limited duration, which together with the following:- o Noise impacts and their consequential effects can only rarely by properly determined solely by simple numerical differences and is only a starting point. o The noises generated by this development during construction may be intermittent throughout the day and so draw more attention.	The Applicant notes the concerns regarding the approach to the construction noise and vibration assessment and the resulting impacts reported at Tyddyn Meredydd. The methodology adopted is based upon nationally accepted industry guidance and conservative assumptions. The Applicant confirms that the assessment approach applied to the Mona Offshore Wind Project, including the derivation of impact criteria and the determination of effects, has been applied to other consented Nationally Significant Infrastructure Projects. The methodology includes consideration of the current baseline environment in the determination of impacts and effects during the day, evening, and night-time periods. The uncertainty and limitations of the assessment and how they have been addressed are detailed in paragraphs 9.5.3.4 to 9.5.3.6 of Volume 3 Chapter 9 of the ES (APP-072). The sensitivity of a receptor is defined based on the use (e.g., residential, commercial, etc.) The location, setting, and existing acoustic environment of the

Reference	Written Representation Comment	Applicant's response
	o We will be affected by more than one type of noise source. o The noise occurrences, repeated over many days, weeks, months and years will cause annoyance and disturbance o The noises generated during construction will be significantly different to our baseline and so much more noticeable. o Because we live in a quiet rural area the impacts will be substantive. o The night time impacts between 23:00 to 07:00, even where there are no periods of 24hr workings will be noticeable and intrusive during the hour of mobilisation starting at 06:00 each morning, a period where we will still want to sleep. And so overall: o We consider the Magnitude to be adverse and Moderate to Substantive. o We consider the Sensitivity to be Medium to High. o Combining these we consider our impact to be Substantial.	receptor is accounted for in the derivation of the impact magnitude criteria from the baseline sound survey data. Tyddyn Meredydd is deemed to be of medium sensitivity during the daytime and high sensitivity at night-time, as outlined in section 9.9 of Volume 3 Chapter 9 of the ES (APP-072). Construction noise and vibration will be controlled via the implementation of mitigation as outlined in the Outline Construction Noise and Vibration Management Plan (APP-215).
REP1-086.24	2.2 Visual PEIR document Volume 4 chapter 26. PEIR Document Non – Technical Summary, Examination Library Reference APP-189 Document Reference J3, Examination Library Reference APP-069 Document Reference F3.6 Throughout the supporting documentation provided by the applicant, greater emphasis has been given to the visual impacts on transient receptors such as walkers, cyclists, vehicle occupants and views from afar. This fact was stressed by the applicant on 2 occasions at ISH 2 on the 18th July 2024 referring to the Clwydian range as being the most and highest sensitivity viewpoint. We feel this is wholly incorrect and that our susceptibility to the proposed change and the value we attach outweighs that of infrequent visitors to the Clwydian range, or is the applicant seriously suggesting that our particular sensitivity will increase if we drive away from our property and view the development from afar	The Landscape Institute has provided guidance on residential visual amenity in Landscape Institute Technical Guidance Note 2/19 Residential Visual Amenity Assessment (LI TGN 2/19). This is considered in Environmental Statement - Volume 3, Chapter 6: Landscape and visual resources (APP-069) paragraphs 6.5.7.4 and 6.5.7.5 The views from Tyddyn Meredydd are considered in paragraph 6.5.7.6 of APP-069.

Reference	Written Representation Comment	Applicant's response
REP1-086.25	The Topography of the onshore substation site will require a cut and fill method and platform with the North Eastern end requiring raising. Although the subsequent substation height is now indicated to be 15mts it is unclear of the actual height above current ground level in order to account for the platform height and any drainage requirements. One hopes that the statement in the applicant's document ref APP-189 - J3 – Design Principles, section 3.4.2.1 is incorrect where it anticipates platform height of between 57mts and 61mts!	The height of 57 m and 61 m is Above Ordnance Datum (AOD), i.e. above mean sea level, which is 0 m AOD. The centre of the substation platform is currently, approximately, 60 m AOD.
REP1-086.26	The applicant makes a statement in Document F3.6 Landscape and Visual Resources section 6.5.7.7 that resident's ground floor rooms are completely or significantly screened from the onshore substation and therefore not considered further. This is simply untrue for Tyddyn Meredydd and highlights a failure by the applicant to correctly assess our viewpoints. Our principal ground floor living space is the conservatory at the front of our property (used all year round), offering direct views of the North Eastern side of the substation, the area where the platform and subsequently the substation building will be the highest above current ground levels. Even after 15 years of mitigation/screening, due to the topography, the substation will still be clearly visible and a prominent feature. (See additional comment re conservatory in section 2.3.1	The Landscape Institute has provided guidance on residential visual amenity in Landscape Institute Technical Guidance Note 2/19 Residential Visual Amenity Assessment (LI TGN 2/19). This is considered in Environmental Statement - Volume 3, Chapter 6: Landscape and visual resources (APP-069) paragraphs 6.5.7.4 and 6.5.7.5 The views from Tyddyn Meredydd are considered in paragraph 6.5.7.6 of APP-069.
REP1-086.27	Viewpoints published by the applicant from our property do not accurately reflect the true impact. At the time photographs were taken we made offers to take representative images from our conservatory (principal ground floor living space) and from the NE boundary of our property, both of which were declined by the applicant's representative.	It is not usual to take views from inside residential properties, as these are private views., Given the height of the proposed development (15 m) and the distance from the Mona onshore substation of the properties, a detailed Residential Visual Amenity Assessment (RVAA) is not required and it was not judged that the RVAA threshold was not reached. Photographs were taken from inside the curtilage of the property and from the adjacent minor road, which enabled a high-level assessment of whether a more detailed RVAA was required. The landscape and visual impact assessment (LVIA) methodology is set out at APP-156. The highest sensitivity visual receptors are those people at publicly accessible locations within internationally and nationally designated landscapes (Table 1.2 of APP-156). The highest impact is complete or very substantial visual change, involving complete or very substantial obstruction of existing view or complete change in character (Table 1.7 of APP-156). Private views do not fall into the categories of high,

Reference	Written Representation Comment	Applicant's response
		medium or low sensitivity receptors. Due to the height of the Mona onshore substation and the distance from it, together with the existing intervening vegetation and the proposed earth-modelling and woodland planting, the magnitude of impact does not fall within the large magnitude of impact category (Table 1.7 of APP-156).
REP1-086.28	Similarly, the view points from behind our property used by the applicant to compare year 1 and year 15, once screening measures have matured are biased. (Image references Annex 6.5 figure 5 year 1 and Annex 6.5 figure 6 year 15) • Year 1 was taken 17/3/22 whereas Year 15 used as a direct comparison was taken 9/8/23, the latter of which shows a much denser foliage covering throughout due to the differences in time of year and therefore not a true and accurate comparison.	It is usual to take winter photographs during the months when the leaves are off the deciduous vegetation as well as summer photographs (GLVIA3, paragraph 6.28). The winter Year 1 photographs are a worst-case. It is also usual to provide summer Year 15 visualisations, using photography taken when deciduous vegetation is in leaf, to illustrate what the scheme will look like after 15 year's implementation. Again, this is quite usual. In fact, due to the depth of woodland planting, the 'twigginess' of the woodland planting would provide an equally substantial screen in any views that might be possible from Tyddyn Meredydd. The Applicant has produced Winter Year 15 visualisations in response to a request from the ExA in Issue Specific Hearing 2. These are provided to the Examination at Deadline 2 [INSERT REF].
REP1-086.29	Other comparative views, in and around this vicinity (although noted as using the same date stamped photograph) have been photo montaged to show heavily foliated existing vegetation compared to base line year 1 and therefore not a true and accurate comparison	APP-157 to APP-159 show both winter Year 1 and summer Year 15 visualisations. These representative viewpoints are from publicly accessible viewpoints.
REP1-086.30	For a more accurate representation then o The same seasonal views should be shown in each year's comparison. o Base line year 0 (current view without any development) should be shown. o For onshore substation site, representative views during construction. o And for onshore substation the night time impacts both during and post construction	See above response to 2.2 (5). Visualisations of temporary construction works are not undertaken, due to the mobile nature of the plant. Photomontages of night time effects during construction are similarly not undertaken. The Mona onshore substation will be unmanned and not lit at night. However, lighting would be used should emergency maintenance be required during hours of darkness, this would be task-related.
REP1-086.31	• Landscape and Visual Assessment Guidelines GLVIA3 to which the applicant referred, section 6.28 states that;- o Consideration should be given to the seasonal differences	The Landscape and visual resources chapter of the ES (APP-069) considers the worst case (winter Year 1) and it is that scenario that is reported in APP-069, as well as summer Year 15.

Reference	Written Representation Comment	Applicant's response
	in effects arising from the varying degree of screening of views by vegetation that will apply in summer and winter	
REP1-086.32	It was stated during ISH 2 on the 18th July 2024 that worst case scenarios had been used in the photo montage images to which we make the following comment: • Worst case scenario does not appear to have been applied for the onshore substation platform. o Using image Annex 6.5 figure 5 year 1 viewpoint 3 and assuming that the substation buildings are represented as 15mts in height would show a platform height above ground level of approximately 1mt o Since this development is indicative and evolving the actual platform height has not yet been declared so an assumption of worst case, i.e. highest potential platform height should have been used.	The height of the platform slopes from 61 m to 57 m AOD for hydrological reasons. The land at the centre of the substation platform currently lies at approximately 60 m AOD. The calculations for the earth-moving have been accurately calculated from these levels in order to consider the proposed earth-modelling and traffic movements. This is the realistic worst-case.
REP1-086.33	Additionally, we will have clear visibility of the substation construction traffic daily as it accesses and egresses the site past the current national Grid substation, of which some 55HGV's and 127LGV's per day are estimated by the applicant	Paragraphs 6.9.1.4 and 6.9.1.5 of APP-069 describes impacts that have been considered within the LVIA, this includes construction vehicles. Views during construction, include vehicle movements are considered in APP-069 at section 6.11.
REP1-086.34	Below is an indication of our current principal ground floor conservatory view towards the proposed North Eastern substation proposed site (year 0): [IMAGE] The applicant's own visualisation below shows the position of the substation in relation to our property and clearly, how it will dominate, loom over and overshadow our outlook: [RVP 1 photomontage] The impacts of this proposed, very large industrial building in the middle of open countryside will be a significant change, overbearing, oppressive, and intrusive, a large contrast to that which we currently enjoy and a blot on the landscape.	Representative viewpoint 1 (Figures 1 and 2 of APP-157) is located 306 m to the north east of the Tyddyn Meredydd conservatory and 289 m from the end of an outbuilding apparently within the Tyddyn Meredydd's curtilage. Representative viewpoint 1 is located at a road junction with a farm track. It includes a field gate-type entrance to National Grid's sealing end compound, with a recently planted hedge. The views from representative viewpoint 1 have been assessed in APP-069 at paragraphs 6.11.2.26.11.2.14. The lane southeast towards Tyddyn Meredydd has vegetated hedgebanks on either side, as seen in Figure B1 of APP-155. Views from the conservatory at Tyddyn Meredydd would be significantly screened by the vegetation along this lane, as well as by the proposed land from and woodland. Figures C2a, C2b, C4a, C4b, C4c and C5a of APP-154 illustrate the hedgerows along the lane adjacent to Tyddyn Meredydd.

Reference	Written Representation Comment	Applicant's response
REP1-086.35	Final comment is that as referenced in Landscape Institute Technical Guidelines - Visual impact assessments are only ever a judgement and that even with qualified and experienced professionals there can be differences in the judgements made. We consider the judgement made by the applicant in our case to be incorrect and lost sight of in the scale and complexity of the assessment.	The judgements made by the landscape professionals within the LVIA (APP-069) are based on site work (i.e. from visits to the area) and experience of similar developments.
REP1-086.36	2.3 Additional Other Personal Impacts In addition to noise and visual there are a number of other issues that will impact upon us and although might be considered minor in isolation, never the less, they do build on the cumulative impact.	The Applicant notes the response.
REP1-086.37	2.3.1 Change In Behaviour During the prolonged construction period we will have to keep our windows, doors shut and severely restrict the use of outside areas. o Having to keep windows and doors shut of our conservatory (principal ground floor room) will render it unusable during any periods of good weather. We are likely to have disruption to sleep patterns due to: o 1 hour mobilisation periods very early each morning o Equipment operating 24 hours a day in close proximity. o Periods of 24hour construction works in close proximity. This proposed development will be very disruptive and a significant inconvenience over its many years of construction.	The Applicant acknowledges the concerns regarding the potential impacts of the Mona Offshore Wind Project on noise and sleep disturbance. ES Volume 3, Chapter 9: Noise and Vibration (APP-072) sets out the noise and vibration assessment for the Mona Offshore Wind Project. ES Volume 4, Chapter 4: Human Health assessment (APP-078) section 4.8.7 'Noise and vibration' considers the population health implication of noise and vibration. The assessment has been undertaken to the relevant guidelines. The assessment concludes that the impact of noise and vibration on human health during construction, operation and maintenance, and decommissioning would be a minor adverse. ES Volume 3, ES Volume 3, Chapter 9: Noise and Vibration (APP-072) describes the approach to mitigation, including measures in section 9.8 'Mitigation measures adopted as part of the Mona Offshore Wind Project'. ES Volume 4, Chapter 4: Human Health assessment (APP-078) concludes the Mona Offshore Wind Project should not result in any significant adverse health effects for the local population.
REP1-086.38	2.3.2 Privacy We currently enjoy a rural aspect surrounded by open countryside, however the planned construction in its close proximity, workings behind, alongside and in front of our property will result in a loss of privacy and diminish our right to enjoy our home peacefully.	The Applicant notes the concern in respect of privacy and refers to the response provided under response reference REP1-086.24 above. The Applicant is keen to continue engagement with the landowner to ensure that the effects of construction can be minimised.

Reference	Written Representation Comment	Applicant's response
REP1-086.39	• 2.3.3 Vibration Our experience when occasional works have been undertaken in fields behind and in front of our property is that vibration effects can be felt due to the nature of the ground with its Limestone groups. The required use of piling hammers, HDD drilling and rock breakers are likely to cause similar impacts (noticeable and disruptive) on close proximity residents and therefore disagree that Vibration is scoped out.	Environmental Statement - Volume 3, Chapter 9: Noise and Vibration (APP-072) considers the impacts of the Mona Offshore Wind Farm on Noise and Vibration – vibration impacts have therefore not been scoped out of assessment. Control measures to manage the impact of construction will be implemented as outlined in the Construction Noise and Vibration Management Plan (APP-215) as part of the Outline Code of Construction Practice (CoCP) (APP-212). The CoCP will be secured under Requirement 9 of the draft Development Consent Order.
REP1-086.40	2.3.4 EMF's Whilst accepting in general that scientific evidence has not found health concerns to the public from EMF's. In 2000, an international group led by Professor Anders Ahlbom took separate epidemiological studies of childhood leukaemia and magnetic fields, pooling the results. They found that in categories of homes with a field of >0.4 microteslas, averaged over 24hours that there was a statistical suggestion of increased risk. If this development goes ahead then we will have underground cabling to the rear, side and front of our property, along with the substation to the front. In addition we already have National Grid 400Kv overhead lines and Scottish Power HV overhead lines in relative close proximity and so due to the potential cumulative effect and the 2000 study of low level exposure over a protracted period we remain anxious and concerned that EMF's are scoped out.	The Applicant notes the concern regarding the decision to scope out EMF considerations from the Environmental Statement. Justification for this decision is provided in Table 4.9 of ES Volume 4, Chapter 4: Human Health assessment [APP-078]. The assessment confirms in Table 4.19 that in order to avoid EMF risks to the public The Mona Offshore Wind Project will adopt and implement relevant design guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) and UK Government Power Lines: Demonstrating compliance with EMF public exposure guidelines – A voluntary Code of Practice. Furthermore, ES Volume 4, Chapter 4: Human Health assessment [APP-078] section 4.8.8 assesses public understanding of EMF risk, including in relation to issues of mental health and anxiety. The assessment notes that the projects' Outline Code of Construction Practice [APP-212] includes a communications plan for dialogue with communities around issues of concern. The health assessment concludes the Mona Offshore Wind Project should not result in any significant adverse health effects for the local population.
REP1-086.41	2.3.5 Open Space – Leisure and Play Living in the idyllic rural area of Cefn Meiriadog has contributed to our enjoyment of life in the open countryside. With suitable permissions, we have routinely, walked our dogs across lands that are now earmarked for compulsory purchase by the applicant. This current rural aspect of life provides health and recreational value to us and whilst open space is not	The Applicant acknowledges the concerns regarding the impacts of the Mona Offshore Wind Project on health, open space and recreation. ES Volume 4, Chapter 4: Human Health assessment (APP-078) section 4.8.5 'Open space, leisure and play' considers the potential impacts of temporary disruption of public open spaces (including beaches) and Public Rights of Way during construction. ES Volume 3, Chapter 7: Land use and recreation of the Environmental Statement. The health assessment has been undertaken to the relevant guidelines, as set out in section 4.3.1, and concludes the Mona Offshore Wind

Reference	Written Representation Comment	Applicant's response
	necessarily a given right, it is yet another nail in the coffin of the damage and harm that this proposed development will have on our daily lives.	Project should not result in any significant adverse health effects for the local population.
REP1-086.42	2.3.6 Light Pollution Light pollution is known to have negative impacts on human health, mental and wellbeing. We currently enjoy the relative dark skies of the undeveloped area. The development of the substation in close proximity with its 24 hour security lighting, car park lighting, vehicular activity (mobilisation) very early in the mornings and late into the evenings with occasions of 24hour workings will impact negatively on our residential amenity	The Mona onshore substation will be unmanned and will not be permanently flood-lit at night. However, operational lighting requirements may include security lighting, general car parking lighting (which may be motion sensitive) and task related flood lighting for repairs or maintenance. The effect of the of lighting at construction is considered within APP-069 as described in Table 6.19, as part of the assessment of construction effects. Requirement 16 of the draft Development Consent Order secures control of operational artificial light emissions and requires approval of a written scheme for the management and mitigation of internal and external artificial light emissions. The substation is required to be operated in accordance with this scheme to minimise the impact of artificial light emissions during the operational period.
REP1-086.43	2.4 Personal Impact Summary – Quality of Life and Well Being Given the over estimation of our baseline noise levels. Given our experiences of disturbance to date where occasional works have been undertaken in close proximity. Given the questionable assumption in the modelling of a 2.4mt acoustic barrier between ourselves and all construction works. Given the long construction hours with 3 ½ to 4 years prolonged exposure 6 days a week, which with current working hours proposed (including mobilisation) equates to disturbances of 75% of our waking time. Given that being retired we will have no respite, no escape and that even construction workers will get more opportunity for breaks away and peaceful sleep. Given that the area is a quiet environment where any construction noise will be noticeable, disruptive and a substantive effect. Given that one of us suffers with Tinnitus. Given that we will need to change our behaviour. Given that there will be periods of 24 hour working in close proximity to our property. Given that the applicant proposes to use trenchless techniques (higher noise levels and potential for 24 hour	The Applicant acknowledges the concerns regarding the potential impacts of the Mona Offshore Wind Project on quality of life and wellbeing. ES Volume 3, Chapter 9: Noise and Vibration (APP-072) sets out the noise and vibration assessment for the Mona Offshore Wind Project. ES Volume 4, Chapter 4: Human Health assessment (APP-078) section 4.8.7 'Noise and vibration' considers the population health implication of noise and vibration. The assessment has been undertaken to the relevant guidelines. The assessment concludes that the impact of noise and vibration on human health during construction, operation and maintenance, and decommissioning would be a minor adverse. ES Volume 3, ES Volume 3, Chapter 9: Noise and Vibration (APP-072) describes the approach to mitigation, including measures in section 9.8 'Mitigation measures adopted as part of the Mona Offshore Wind Project'. ES Volume 3, Chapter 6: Landscape and visual resources (APP-069) sets out the visual assessment for the Mona Offshore Wind Project. ES Volume 4, Chapter 4: Human Health assessment (APP-078) section 4.10.4 'Community identity, culture, resilience and influence' considers the population health implication of visual. The assessment has been undertaken to the relevant guidelines. The assessment concludes community identity health effects in relation to visual impacts would be minor adverse, acknowledging that there will be a range of subjective responses to the visual change. ES Volume 3, Chapter 6: Landscape and visual resources (APP-069) describes the approach to mitigation, including measures in section 6.8 'Landscape mitigation measures adopted as part of the Mona Offshore Wind Project'.

Reference	Written Representation Comment	Applicant's response
	workings) in close proximity to our property. Given the lack of cumulative noise assessment and the unique position of our property within the construction zones. Given the types of heavy duty industrial construction equipment that will be used in close proximity: CAT 360 excavators/Rock breakers/Concrete munchers/ Piling/Hammers/HDD etc Given the high probability that we will suffer noise level increase, disturbance and significant effects over our current ambient noise for periods >10 or more working days in any 15 consecutive days and >40 days in any 6 consecutive months. Given the failure to accurately assess our visual impacts. Given that our health linked to the levels of residential amenity we enjoy will be significantly affected. Given that this development would negatively impact our property value. Given the detrimental impacts on our quality of life and wellbeing. Given the clear and obvious cumulative impacts. We believe that no amount of mitigation can adequately protect and shield us from the significant detrimental impacts that this development will cause, therefore We ask that if yourselves as Planning Inspectors cannot reject this application as a result of our personal impacts then in line with: BS5228-1:2009+A1:2014 That if noise levels generated by site activities for residential properties result in disturbance and interference with activities or sleep for a significant extent of time e.g. in excess of 6 months, then there might be advantages in offering permanent rehousing BP Project Consultation Brochure summer 2022 where project director Richard Haydock stated "Committed to making sure we deliver it in a way that works for people that live and work in the areas that these projects are located" BP Code of conduct – Core principles setting out standards for how to do the right thing	ES Volume 4, Chapter 4: Human Health assessment (APP-078) concludes the Mona Offshore Wind Project should not result in any significant adverse health effects for the local population.

Reference	Written Representation Comment	Applicant's response
	Wanting to help improve people's lives Committed to doing the right thing when engaging with communities Wanting to be a trusted neighbour Putting themselves in other people's shoes That through no fault of our own and being in this regrettable and unenviable position, the ethical and moral option is to recommend that the applicant purchases our property as part of this scheme should the development be granted Development Consent Order	
REP1-086.44	Section 3 In addition to Personal Impacts we make the following comments and their impacts on the wider community	The Applicant notes the response.
REP1-086.45	3.0 Onshore Site Selection 3.1 Suitability Individual radial connections are not fit for purpose for a modern energy system, less efficient, more expensive overall and therefore more costly to consumers. This proposed scheme is a sister development to Morgan offshore wind which is sited approximately 11Km away from Mona with same developers and similar timescales for construction. It is illogical to have 2 distinctly separate developments resulting in major environmental and community impacts affecting multiple communities. It requires duplications in documentations, surveys, people, resources and planning inspectorate time, more cost to the developer to construct and maintain and therefore more cost having to be passed on to the end user. The electricity generated by this development is not for the benefit of Denbighshire or North Wales, nor will it provide any medium or long term benefits, the area is being used merely as a transition hub. Denbighshire and Cefn Meiriadog are already doing more than its fair share for renewable energy. It is noted that the developer has yet to commit as to what the electricity generated will be used for, suggesting last year that they might want to use the electricity to power their	The ultimate decision for the connection point for the Mona Offshore Wind Project (and the Morgan Offshore Wind Transmission 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 in Denbighshire, North Wales. It is not for the Applicant to determine what the electricity generated will be used for, this is covered by the connection agreement with NGESO. Figure 4.16 of the Site Selection and Consideration of Alternatives chapter (AS-016) illustrates the initial long list of potential locations for the onshore substation. Brownfield sites were not discounted in this initial long-listing process. In undertaking the site selection process, the Applicant was not able to identify any brownfield sites which were both available for development and met the size requirements to accommodate the infrastructure..

Reference	Written Representation Comment	Applicant's response
	own charging points throughout the country, something which will enhance BP and EnBW profitability and something for which we in North Wales will be left to pay for in real terms The options for Brown field sites have been ignored: Initial survey options looking into potential connection sites undertaken by the developer did not recommend the National Grid substation at Bodelwyddan. Subsequent connection agreements were made to Wylfa, later changed to Bodelwyddan. Reasons and restraints cited by the applicant for not opting for other potential sites such as Connahs Quay or Penworthan appear to be merely excuses and not reasons. The developer, UK and Welsh governments say that connectivity points are up to National Grid, washing away all and any responsibility. However, National Grid appears unaccountable, have no interest in subsequent environmental and community impacts. Instead National Grid PLC puts its own profitability ahead of any environmental or community damage, safe in the knowledge that the planning processes protect them from real scrutiny.	
REP1-086.46	3.2 Onshore Substation The substation site is very prone to excess water and whilst engineering wise it may be feasible to be built, the creation of over 14 acres of impermeable ground and a 6-8mt wide permanent access road will only exacerbate issues further North East, towards the lower ground areas including lands where there are existing infrastructures. The substation site chosen by the applicant was previously rejected by Awel y Môr due to proximity of residential properties, visual impacts, and impacts on historical landscapes, high risks of significant impacts for traffic, archaeology and a moderate risk for ecology receptor groups. These issues have not gone away and therefore question why it is now deemed suitable for much larger constructions. The site proposed does not comply with rural economic policies where the permanent harm outweighs any short to	The Applicant notes the concerns regarding flood risk, site selection and policy. The Maximum Design Scenario within Volume 3, Chapter 2: Hydrology and flood risk (APP-065) states that up to 42,000m^2 (of the 65,000m^2 of the onshore substation platform) will be impermeable. The Hydrology and flood risk chapter also includes an assessment of potential increased flood risk arising from additional surface water runoff during operation of the onshore substation and concludes that there is no increased risk due to the measures as outlined within Table 2.20. The Outline Operation Drainage Management Strategy (APP-231) states that surface water run-off from the Onshore Substation will be collected by perimeter drains and contained within an adjacent attenuation basin (site control), prior to a controlled discharge to the nearby unnamed watercourse. Additional SuDS components will be incorporated as necessary (source control) – to be reviewed at the detailed design stage. A preliminary design for the attenuation basin is included within Figure 1.3 of APP-231. The onshore substation site selection process considered the issues raised by the Awel y Mor Offshore Wind Farm site selection. The Applicant notes that the Awel y

Reference	Written Representation Comment	Applicant's response
	medium term perceived benefits. The site proposed does not comply with Future Wales strategy for renewable energy developments that there are no unacceptable adverse visual impacts on nearby communities and individual dwellings. The site proposed does not comply with Planning Policy Wales - Key planning Principles – Achieving the Right Development in the Right place, Natural, historic and cultural assets must be protected, promoted, conserved and enhanced. Negative environmental impacts should be avoided in the wider public interest, meaning acting in the long term so that resources and/or assets are not irreversibly damaged or depleted. The site proposed does not comply with Planning Policy Wales – Place making in Rural areas – The countryside is a dynamic and multipurpose resource, it must be conserved – open green spaces should be protected from development	Mor Offshore Wind Farm site selection concluded that the location "was therefore considered to be moderate-lower risk of potentially significant impacts, with capacity to accept some development." The Applicant believes that the risks associated with the selected onshore substation site have been mitigated as much as possible throughout the application resulting in reduced risks or potential for impacts; and that this supports the selection of the onshore substation site. As a Nationally Significant Infrastructure Project, the tests that the application must satisfy are contained within the National Policy Statements. These are covered at a high level in Table 2.1 of Policy and Legislative Context (APP-049) and in detail within each chapter of the Environmental Statement. The Site Selection and Consideration of Alternatives (AS-016), Onshore Ecology (APP-066), Historic Environment (APP-068), Landscape and Visual Resources (APP-069) and Land Use and Recreation (APP-070) chapters all include an assessment against Planning Policy Wales and how the application either complies with, or mitigates any potential impacts associated with, the policy requirements.
REP1-086.47	3.3 Scale Over 60 acres of agricultural lands, including best and most valuable lands are proposed for compulsory purchase by the developer of which 30 acres is permanent footprint. The statement made in PEIR volume 20 Land Use and Recreation, item 20.8.3.7 that:- "The sensitivity of the holding affected by the permanent loss of land associated with the onshore substation is assessed as Low based on the loss of a single block of land within a large land holding" Is irresponsible and shows a flippant attitude by the applicant and its agent. This proposed substation development is simply too large and an unacceptable increase of activity into a working country environment. The scale and nature will harm the character and appearance of the whole rural area; it's an overdevelopment and a blot of the landscape.	The assessment of the effects of the Project on agricultural land is contained within Environmental Statement - Volume 3, Chapter 7: Land use and recreation (APP-070). The significance of the permanent effect on agricultural land quality is based on the permanent loss of the land at the Onshore Substation and associated earthworks, including landscaping and pond excavation, together with potential losses of less than 0.1 ha for link box covers. In total, the Project will result in the loss of 1.6 ha of Subgrade 3a land. Based on National Policy under Planning Policy Wales and the consultation criteria for where consultation on the loss of best and most versatile land within Welsh Government provided in Technical Advice Note 6 (Annex B, paragraph B2), this is not considered to be a significant loss of the best and most versatile agricultural land, as the area of Subgrade 3a affected falls well below the threshold of 20ha identified in this policy.

Reference	Written Representation Comment	Applicant's response
REP1-086.48	3.4 Environmental and Community Impact The area of Cefn Meiriadog covers 3342 acres with approximately 180 households and a population of 359 people, it is a working rural area valued for its peace and tranquillity. This proposed development taking 60 acres of permanent land uptake, combined with the necessary modifications and extension to the National Grid Substation, the erection of 4 new pylons (towers) will result in a complete change of character, appearance and the way farmers and residents use the area. This development once operational will be a permanent eye sore. Despite the permanent environmental and community impacts this development offers very little, if any, long term benefit for the area and local community. Future token financial donations to local causes cannot and do not justify the wholesale industrialisation of large swathes of this rural area.	The Applicant notes the comment and refers to specific responses to the comments above.
REP1-086.49	3.4 Traffic Glascoed Road B5381 and FFordd William Morgan St Asaph Business Park Data presented by the applicant in Examination Reference APP-179, Document reference F9.7.2 Appendix C indicates traffic : FFordd William Morgan to Engine Hill B5381 217 vehicle increase of which 68 are HGV's FFordd William Morgan to Substation access 234 vehicle increase of which 95 are HGV's A55 Junction and along FFordd William Morgan 401 vehicle increase of which 162 are HGV's Neither Glascoed Road nor FFordd William Morgan are suitable for such large numbers of increased traffic and particularly not HGV's where the applicant indicates an estimated 101% increase. It is noted that initial plans to use HGV access from the A55 up Engine Hill have been shelved with Denbighshire County Council highlighting that it would be difficult for HGV's to pass each other in opposite directions. Glascoed Road is similar to Engine hill and for anyone who has followed an HGV along Glascoed road will know that they straddle the road making	An assessment of the effects of traffic generated by the Mona Offshore Wind Project is set out in Volume 3, Chapter 8: Traffic and transport (APP-071). The assessment concludes only a minor adverse effect which is not significant on driver delay caused by construction works or construction traffic, and severance caused by construction works or construction traffic. Due to the geometries of Engine Hill between the A55 Junction 25 and the B5381 Glascoed Road (link 23), no construction HGVs will be permitted to arrive or depart using this section of the local road network. This is set out in the Outline Construction Traffic Management Plan (CTMP) (APP-225). The preparation of a detailed CTMP to be substantially in accordance with the outline CTMP is secured under Requirement 9 of the draft Development Consent Order.

Reference	Written Representation Comment	Applicant's response
	it difficult also for any HGV's to pass in opposite directions. Roadworks and repairs along Glascoed Road are frequent. Below is a summary of road works that have been carried out in the last 5 years (20/6/19 to 20/6/24) from the proposed substation access to the top of engine hill (information sourced from Denbighshire County Council records • Burst water/leaks/repairs o 19 instances totalling 72 days of road restrictions • BT/Open reach access to infrastructures o 10 instances totalling 11 days of road restrictions • Carriage way repairs/drainage/grass cutting/patching etc. o 19 instances totalling 65 days of road restrictions The additional increase in traffic, particularly HGV's, from this development along with other planned and proposed developments all requiring to use Glascoed Road will only add even more disruption and damage to this B road. Regular repairs to manhole covers, siting directly in the driving line are often required along FFordd William Morgan, increases of HGV's will exaggerate this problem even further. Additionally, although there are pathways within the business park area there is a lot of footfall activity especially during lunchtimes and large increases in traffic increases the risks to pedestrians.	
REP1-086.50	3.5 Cumulative Impacts There are a number of renewable energy schemes and associated infrastructures planned over the short to medium terms in and around Cefn Meiriadog/ St Asaph This particular development is just one of those schemes but is far and away the largest and whose planned construction activities around Cefn Meiriadog /St Asaph will coincide with other developments. Any one of these schemes in itself is significant but in combination will be devastating for several years as they all focus on the single National Grid Connection point utilising	The Environmental Statement (ES) - Volume 5, Annex 5.1: Cumulative effects screening matrix (APP-084) sets out the long list of relevant projects, plans and activities with which the Mona Offshore Wind Project may interact to produce a cumulative effect. The screening matrix underpins the Cumulative Effects Assessment (CEA) for the Mona Offshore Wind Project with individual screening undertaken for each topic chapter within the Environmental Statement. This screening identifies the projects, plans and activities where there is potential for a cumulative effect on the identified topic receptors. The screening matrix identifies the proposed extension to the Bodelwyddan Substation as a project for assessment in the CEA.

Reference	Written Representation Comment	Applicant's response
	the same access roads and routes. The impacts of this scheme should not be considered in isolation. National Grid in their future energy scenarios accused the government of working in silos and a lack of communication, this is exactly what is happening now as:- At the moment because of the way planning is examined, there is no statutory body or agency considering the cumulative impacts of all these schemes that are already in place, that are planned or foreseeable. Each scheme is assessed in isolation, even though in the case of National Grid extension it is an indispensable component without which Mona cannot operate under its current plans. There is a suspicion that National Grid are holding back on their formal application to the council until this examination closes, this will mean lack of evaluation of real cumulative impacts by the Mona development team, even though the extension to the National Grid substation is an integral part and whose construction needs to be undertaken at the same time. The basic question is when is enough enough and how many energy schemes and infrastructures can, or should any area like Cefn Meiriadog accommodate?	In relation to cumulative effects the only potentially significant adverse effects are in relation to benthic subtidal and intertidal ecology, fish and shellfish, marine mammals, shipping and navigation and terrestrial designated historic assets (although the contribution the being of other offshore wind projects, such as the consented Awel y Môr project). The Applicant refers to the response to REP1-086.45 in relation to the selection by NGESO of a radial connection to Bodelwyddan.
REP1-086.51	3.6 National Policies We note your request that reference to national policies should not be made but since the applicant throughout its supporting documentation refers frequently to National policies and selective parts as to how the development is supporting these policies then we would like to make the following comments. This development as proposed fails to comply or deliver against the clear overall aims and objectives of National Policy even though it has obvious potential for an integrated solution and therefore less overall environmental and community impact: NGESO Cost benefit analysis Offshore Transmission Network Design 2020:	The National Policy Statement Tracker (APP-187) provides an evaluation of the accordance of the proposed development with the relevant National Policy Statements. The Applicant refers to the response to REP1-086.45 in relation to the selection by NGESO of a radial connection to Bodelwyddan.

Reference	Written Representation Comment	Applicant's response
	o An integrated design has the potential for 18% savings in Capex (investment) and Opex (maintenance costs) and significant reduction in environmental, social and local impacts. National Policy statement for Energy: o Coordinated applications bring economic efficiencies and reduced environmental impact National Policy Statement for Renewable Energy Infrastructure: o A more coordinated approach to offshore-onshore transmission is required o A coordinated approach will provide system benefits, reduce costs to the consumer and maximise market access for generators o Greater coordination of transmission infrastructure will help lesson overall impacts The OTR and each of its 3 work streams o Early opportunities – Encourage developers and interconnectors to coordinate o Pathway to 2030 – Point to point connections is not appropriate for the scale and ambition o Enduring Regime – Consider the offshore transmission holistically This development as proposed offers zero coordination, a non-holistic approach, a complete failure for North Wales, devastation for the rural area and the residents of Cefn Meiriadog. As planning inspectors you might consider these points as out of scope but we simply ask: If this is really a right and fit development and is it in the right place?	

2.19 Michael and Sally Leach

Table 2.19: REP1-087 – Michael and Sally Leach

Reference	Written Representation Comment	Applicant's response
REP1-087.1	I am writing to set out our concerns for the impact of this Project on the Property. The Owner is freehold owner of the Property which will be directly affected by the Project. The Property is registered with the Land Registry under title CYM871374. The Project design has changed from the formal consultation phase and land is no longer being acquired from the Owner. However, the Owner will have rights affected by the Project and will suffer significant disturbance during the construction phase, being located less that 100m from the cable route, haul road and several HDD crossings. Whilst strictly 'outside' the project boundary the Owners and the Property will be practically part of the Project and this will create an unintentional consequence that the Owners will not be able to seek equivalence under the Compensation Code. Having had their Property removed from the Project, this will make the Owners statutory route to claim compensation extremely difficult under the Compensation Code. The Property has been on the market for some time and has failed to attract a buyer, we consider, as a direct result of perceived risk of disturbance from the Project. The Owner has no route to Statutory Blight. We are seeking an undertaking from the Project that the Owners route to claim compensation under the Compensation Code is fully protected in line with a landowner who has property acquired under a scheme given their immediate proximity to it. The impacts of noise, dust and vibration are all set out in the Project Environmental Statement as falling into the 'High' category of magnitude and adequate protection under the Compensation Code should be afforded to the Owners. Whilst, subject to the above points, the Owner is not opposed to the development of the Project in principle, there	The Applicant notes the response and is aware of Michael and Sally Leaches interest in land and the property referred to. Michael Leach is listed as a category 3 interest in the Book of Reference (D4 F04). A category 3 interest may be entitled to make a relevant claim. The Applicant believes that, if the Order were to be made and fully implemented, they may be entitled to make a relevant claim as defined in section 57(6) of the 2008 Act. A relevant claim is a claim under section 10 of the Compulsory Acquisition Act 1965, a claim under part 1 of the Land Compensation Act 1973, or a claim under section 152(3) of the 2008 Act.

Reference	Written Representation Comment	Applicant's response
	are strong concerns regarding the current proposed onshore cable route and associated works at the Property, and within the vicinity of it. These concerns are set out below and require further clarification.	
REP1-087.2	To date, we have received limited information and plans for the design of the scheme detailing what impact construction will have in this area and what mitigation works will be put in place by the Project. Specifically, the Property enjoys a water supply across third party land under Rights proposed to be affected by the Project. What affect will the Project have on the Property's water supply?	The assessment of construction effects that may arise as a result of the Mona Offshore Windfarm Project is set out in each topic chapter of the Environmental Statement. Potential impacts to private water supplies are considered in Volume 7, Annex 1.2: Groundwater sources of supply – hydrogeological risk assessment of the Environmental Statement (APP-116). The hydrogeological risk assessment confirms the qualitative risk rating for the private water supplies (PWS) identified together with recommended mitigations. For PWS qualified as being at high-risk mitigation may include provision of permanent alternative source of supply (e.g. borehole or mains water connection) or site visit and additional hydrogeological characterisation to enable a more detailed assessment of risk. For PWS qualified as being at moderate risk mitigation may include monitoring during construction phase, with contingency measures in place should supply source be temporarily affected by the activity activities or site visit and additional hydrogeological characterisation to enable a more detailed assessment of risk. For PWS qualified as being at low-risk mitigation may include temporary contingency measures in place should supply source be affected during construction phase. No mitigation is proposed for PWS qualified as being at negligible or no risk. Discussions with landowners will be undertaken at the detailed design stage to confirm the location of private water supplies. Prior to any construction activities, utility surveys will be undertaken to establish if any infrastructure is present prior to any intrusive work being undertaken. The Mitigation and Monitoring Schedule (J10 F02) confirms that the development and implementation of mitigation measures for private water groundwater supply sources would be based on a hierarchy set out in the detailed Code of Construction Practice which is secured by Requirement 9 of the draft Development Consent Order.
REP1-087.3	There is insufficient detail on the proposed design and locations of specific works in Works Area, with further information being required in the construction methodology, onshore cable route, haul road detail, and highway and transport detail before we can accurately assess the impact on the Property.	The Mona Offshore Wind Project is within the development process. The Project has been assessed using an 'envelope' approach, designed to include flexibility to accommodate further project refinement during detailed design, post consent. Offshore wind is a continually evolving industry with a constant focus on safety, increased efficiency and cost reduction, therefore improvements in technology and construction methodologies occur frequently and an unnecessarily prescriptive approach could preclude the adoption of new technology and methods. Table 3.1

Reference	Written Representation Comment	Applicant's response
		of Environmental Statement - Volume 1, Chapter 3: Project Description (APP-050) sets out the key parameters for the Project which have been used to undertake an assessment of the worst-case scenario. As the detailed design of the Project develops, those with an interest in the land will be made aware of the detailed design of the elements of the Project which affect their rights. The mitigation measures will be agreed with the Local Planning Authority and the implementation of the secured mitigation measures at this time will be publicly available (as set out in the Mitigation and Monitoring Schedule (J10 F02)). Schedule 1 of the draft Development Consent Order (DCO) (PDA-003) provides a detailed description of the authorised development. The Onshore Works Plans (AS-003) are numbered to correspond with the works packages identified in the draft DCO.
REP1-087.4	Lack of detail in Code of Construction Practice, PEIR, draft DCO and Work Plans. Inadequate information provided for accurate assessment on the significance impacts to the Property from: o Construction traffic, vehicle movements and road closures o Noise o Vibration o Lighting o Dust/Fumes o Soil Storage and Management o Environmental impacts and mitigation areas o Footpath and PROW diversions o Decommissioning o HDD locations and working requirements o Construction compounds and storage locations o Temporary and Permanent Works access routes o Construction Programme	The Environmental Statement contains a detailed assessment of effects during the construction, operation and decommissioning stages of the Mona Offshore Wind Farm Project in respect of noise and vibration (APP-072), traffic and transport (APP-071), Air Quality (APP-073) and Land Use and Recreation (APP-070). A detailed description of the project including the works required for construction of the Project is set out in Environmental Statement - Volume 1, Chapter 3: Project Description (APP-050). The Outline Code of Construction Practice (CoCP) (J26 F02) is supported by a number of Outline Management Plans in order to manage any construction effects, including: Outline Landscape and Ecology Management Plan (J22 F02) Outline Soil Management Plan (J26.8 F02) Outline Public Rights of Way Management Strategy (J26.17 F02) Outline Construction Traffic Management Plan (J26.13 F02) Outline Dust Management Plan (J26.2 F02) Outline Construction Noise and Vibration Management Plan (J26.3 F02) Outline Construction Surface Water Drainage Plan (J26.6 F02) Outline Artificial Light Emissions Plan (J26.10 F02) Outline Highways Access Management Plan (APP-228) The preparation of detailed management plans is secured as a requirement of the draft Development Consent Order.

Reference	Written Representation Comment	Applicant's response
REP1-087.5	While we have been assured trenchless crossings will ensure no roads in the area have to be closed for to facilitate works, we have no detail on how the construction haul road crossing the route will be managed and what impact this will have on local traffic.	An Outline Construction Traffic Management Plan (J26.13 F02) has been prepared as part of the Outline Code of Construction practice to manage construction haul road crossings and to minimise impacts for users along the highway network. There will be some locations whereby the haul road crosses the highway and where traffic management will be required or where works are required to expose existing utilities. The traffic management methods to be used will depend on the location of the highway crossing, the nature and level of traffic on the highway link being crossed, what is served by the highway link and the alternative routes available. Where the haul road crosses existing highway links, traffic management would be used to ensure that safe crossing by highway traffic and haul road vehicles and this will be managed in line with the provisions set out in the Outline Construction Traffic Management Plan. Methods may include temporary shuttle working crossings, or temporary closure. Further detail will be confirmed prior to the commencement of construction in the detailed Construction Traffic Management Plan which is secured by Requirement 9 of the draft Development Consent Order.
REP1-087.6	The Property is crossed by a number of existing utility and private service media. Current proposals do not include adequate information or design tolerance for avoiding or diverting these existing services. All services are to be maintained throughout the duration of the Project.	As stated in the Outline Onshore Construction Method Statement (J26.15 F02), all potentially affected utility providers will be contacted, and the location of existing services will be accurately identified on the ground prior to construction or intrusive ground investigations. On exposure of services the contractor shall record the position and depth of each service encountered. All measures for protection, as agreed, will be implemented before any works commence. All utility crossings will be undertaken in accordance with the protective provisions to ensure continuity of supply. The draft Development Consent Order (DCO) (C1 F04) includes a requirement for the preparation of a final Code of Construction Practice (J26 F02). The final CoCP will be supported by a series of management plans including a Construction Method Statement (as part of the final CoCP), which must be submitted to and approved by the relevant planning authority prior to the commencement of onshore works.
REP1-087.7	The Owners do not consider sufficient engagement has been undertaken with landowners to fully inform the project design or to incorporate relevant mitigation. Further detailed engagement should continue with all affected parties to ensure feedback and mitigation is fully considered and we	The Applicant welcomes the opportunity to engage with Michael and Sally Leach and their agent to discuss the project and will continue to do so to identify and discuss mitigation Feedback from Mr and Mrs Leach has been taken into consideration during the site selection as set out in the Environmental Statement Volume 1 Chapter 4: Site Selection and Consideration of Alternatives (AS-016)

Reference	Written Representation Comment	Applicant's response
	welcome meaningful engagement with the Project Team going forward.	

2.20 Mr and Mrs J T Owen

Table 2.20: REP1-088 – Mr and Mrs J T Owen

Reference	Written Representation Comment	Applicant's response
REP1-088.1	I am writing to set out our concerns for the impact of this Project on the Property. The Owner is freehold owner of the Property which will be directly affected by the Project. The Property is registered with the Land Registry under title CYM871374. Whilst the Owner is not opposed to the development of the Project in principle, there are strong concerns regarding the current proposed onshore cable route and associated works at the. Property, and within the vicinity of it.	The Applicant notes the response.
REP1-088.2	The Property comprises of two residential units at Nant Fawr farmstead, agricultural land and woodland. The land is managed in-hand, but grazing rights are let to third parties on an annual basis. There are various environmental schemes that may be affected by the Project. The design detail Throughout the consultation material is extremely broad for this formal stage of feedback but it is clear that the Project will cause significant short and long-term disturbance to the Owners and the Property. Due to the differing boundaries put out at various times by the scheme covering different areas of the field, we are currently unclear how much of the field will be required for the construction of the scheme, and over what total area rights will be taken for the benefit of the scheme outside of the proposed easement area. Any residual land rights acquired under compulsory acquisition powers will significantly affect the value of the Property. Particularly as in this case the easement runs along the road boundary for the field.	The Applicant's land agents have been engaging with the landowners Mr and Mrs J T Owen and their agent which includes the issuing of plans showing the order limits which aligns with plots 05-080 and 05-081 of the Land Plans (AS-005). The Applicant's land agent are continuing to discuss and provide information on the proposals for the land during construction. Compensation for the reduction in land value will be assessed in accordance with the Compensation code.
REP1-088.3	To date, we have received limited information and plans for the design of the scheme detailing what impact construction will have in this area and what mitigation works will be put in place by the Project. There is insu'icient detail on the proposed design and locations of specific works in Works Area, with further information being required in the	The assessment of construction effects that may arise as a result of the Mona Offshore Windfarm Project is set out in each topic chapter of the Environmental Statement. The mitigation measures secured as part of the draft Development Consent Order are summarised in the Mitigation and Monitoring Schedule (J10 F02) description of

Reference	Written Representation Comment	Applicant's response
	construction methodology, onshore cable route, haul road detail, and highway and transport detail before we can accurately assess the impact on the Property. Lack of detail in Code of Construction Practice, PEIR, draft DCO and Work Plans. Inadequate information provided for accurate assessment on the significance impacts to the Property from: o Construction traffic, vehicle movements and road closures o Noise o Vibration o Lighting o Dust/Fumes o Soil Storage and Management o Environmental impacts and mitigation areas o Footpath and PROW diversions o Decommissioning o HDD locations and working requirements o Construction compounds and storage locations o Temporary and Permanent Works access routes o Construction Programme While we have been assured trenchless crossings will ensure no roads in the area have to be closed for to facilitate works, we have no detail on how the construction haul road crossing the route will be managed and what impact this will have on local traffic.	the authorised development. The Onshore Works Plans (AS-003) are numbered to correspond with the works packages identified in the draft DCO. The Outline Code of Construction Practice (CoCP) (J26 F02) and Environmental Statement including Volume 1 Chapter 3 Project Description (APP-050) is supported by a number of Outline Management Plans in order to manage any construction effects, including: • Outline Soil Management Plan (J26.8 F02) • Outline Public Rights of Way Management Strategy (J26.17 F02) • Outline Construction Traffic Management Plan (J26.13 F02) • Outline Dust Management Plan (J26.2 F02) • Outline Construction Noise and Vibration Management Plan (J26.3 F02) • Outline Construction Surface Water Drainage Plan (J26.6 F02) • Outline Artificial Light Emissions Plan (J26.10 F02) • Outline Highways Access Management Plan (APP-228) • Outline Landscape and Ecology Management Plan (J22 F02) The preparation of detailed management plans is secured as a requirement of the draft Development Consent Order. For more detail on the interactions between the cable corridor and haul road and the highway, the Applicant refers to section 1.10 of the Outline Construction Traffic Management Plan (J26.13 F02).
REP1-088.4	The Property is crossed by a number of existing utility and private service media. Current proposals do not include adequate information or design tolerance for avoiding or diverting these existing services. All services are to be maintained throughout the duration of the Project.	As stated in the Outline Onshore Construction Method Statement (J26.15 F02), all potentially affected utility providers will be contacted, and the location of existing services will be accurately identified on the ground prior to construction or intrusive ground investigations. On exposure of services the contractor shall record the position and depth of each service encountered. All measures for protection, as agreed, will be implemented before any works commence. All utility crossings will be undertaken in accordance with standards agreed with the utility owner/operator, as required. The draft Development Consent Order (DCO) (AS-10) includes a requirement for the preparation of a final Code of Construction Practice (J26 F02). The final CoCP will be supported by a series of management plans including a Construction Method Statement (as part of the final CoCP), which must be submitted to and

Reference	Written Representation Comment	Applicant's response
		approved by the relevant planning authority prior to the commencement of onshore works.
REP1-088.5	There has been little information provided as to the requirement for temporary and permanent land rights for which the project may seek Compulsory Acquisition powers. Our understanding currently suggests the project is seeking to take permanent land rights, even though the scheme has a finite lifespan, we would like detailed justification as to why this is deemed necessary and proportionate. We request instead the lifetime of the rights are limited to a set number of years or for the construction, operation and decommissioning of the project only.	As is industry standard, the Applicant has included within its application Compulsory Acquisition powers to protect the delivery of the project. These rights will be in perpetuity and the Applicant is seeking the equivalent rights within the voluntary agreements and as set out in the Statement of Reasons paragraph 1.10 (APP-029) which is a standard practice across the industry.
REP1-088.6	The Owners do not consider sufficient engagement has been undertaken with landowners to fully inform the project design or to incorporate relevant mitigation. Further detailed engagement should continue with all affected parties to ensure feedback and mitigation is fully considered and we welcome meaningful engagement with the Project Team going forward. The Owners are members of the NFU and we have been working collectively with this organisation and other landowner representatives to provide additional general concerns which have been raised directly by the NFU. We remain fully aligned with the overarching concerns of the NFU and anticipate full and detail responses to their representations on our behalf.	The Applicant welcomes the opportunity to engage with Mr and Mrs J T Owen and their agent to discuss the land rights being sought as Heads of Terms negotiations continue.

2.21 Stuart Neil

Table 2.21: REP1-090 – Stuart Neil

Reference	Written Representation Comment	Applicant's response
REP1-090.1	As an affected party i request a compulsory purchase hearing also i would like to request an in person visit by the Exa to pen yr efail crossroads the area close to proposed tcc2	The Applicant notes the response and can confirm a visit to land in the vicinity of the Penrefail crossroads including temporary construction compound 2 has been included in the accompanied site inspection draft itinerary. A visit to the crossroads was also undertaken by the Examining Authority during their unaccompanied site visit on 18 June 2024 [EV-005].

2.22 The Executor of the Estate of the Late David Watkin Williams-Wynn BT

Table 2.22: REP1-091 - The Executor of the Estate of the Late David Watkin Williams-Wynn BT

Reference	Written Representation Comment	Applicant's response
REP1-091.1	Please treat this email as a request by an affected person (The Executor of the Estate of the Late David Watkin Williams-Wynn BT) to participate in a compulsory acquisition hearing relating to the interests proposed to be acquired as set out in the Book of Reference. We would also welcome the opportunity to participate in any future open floor hearings relating to those interests.	The Applicant notes the request.
REP1-091.2	In terms of specific comments: My client still has no clarity on why their land was preferred over other options. We completely refute the idea that there has been "extensive consultation", as set out in the Applicant's statement of reasons, and in no way have they sought to accommodate preferences or concerns raised by my client (paras 1.6.1.7 and 1.6.1.10).	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. It is the Applicant's position, in accordance the policies set out in NPS EN-1, and based on input from the multidisciplinary project team and stakeholder engagement, that the proposed onshore substation south of immediately south the National Grid Bodelwyddan substation (Onshore Substation Option 2) offers the appropriate option for the siting of the Mona Offshore Wind Project onshore substation. 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 decision where to locate the onshore substation was presented to the Site Selection Expert Working Group (EWG) and announced via newsletter and online publication in August 2023 (along with an announcement regarding the preferred onshore cable route). The Estate were informed of the decision directly. Throughout the site selection process and prior to the Order Limits being finalised, the Applicant requested meetings with the affected party on numerous occasions to further the detailed discissions regarding the design. The Applicant considered the future plans for the estate as far as the Applicant was made aware to reduce disturbance and interface of projects. In particular, the project sought to minimise interactions with the objector's proposed solar farm (St. Asaph Solar Farm Case Reference CAS-01392-D2T3F3).

Reference	Written Representation Comment	Applicant's response
REP1-091.3	We do not understand the scale of the land take being proposed – particularly given the impact that the haphazard approach will have on the various farm tenancies.	The Book of Reference (D4 F04) and Land Plan (AS-005) detail what rights are being sought over each parcel of land. The principles and commitments regarding the extent of the land for acquisition associated with the ecological and landscaping requirements around the onshore substation are detailed in Section 1.7 of the Outline Landscape and Environmental Management Plan (J22 F02). The landscape and ecology management proposals have been developed to avoid, reduce and manage impacts on landscape and ecology during construction, operations and maintenance of the Mona Offshore Wind Project. As compulsory acquisition rights are being sought to ensure the delivery of the Mona Offshore Wind Project, the Applicant is required to minimise its interference with and use of the land within the Order Limits. Dalcour Maclaren on behalf of the Applicant has been engaging with the farming tenants affected by the project to better understand and mitigate impacts where possible. The assessment of impact to the current occupier of the land for the proposed onshore substation has been assessed in the Environmental Statement Volume 3, Chapter 7 – Land Use and recreation (APP-070), the magnitude of the permanent loss is assessed to be medium, based on the partial loss of the land to the wider dairy enterprise affected.
REP1-091.4	There is no reason for freehold acquisition when leasehold has proved more than adequate for similar schemes in the past. Those other schemes are within the same are and same ownership as the proposal so there is absolutely no reason why the acquisition should need to differ.	The Applicant refers to 1.3.2.30 of the Statement of Reasons (APP-029) which explains why the Applicant is seeking a freehold interest. The Applicant notes the tenure of the other substations and wishes to engage with The Executors of the Estate of the Late David Watkin Williams-Wynn BT to discuss a voluntary agreement for the land being sought for the development which currently aligns with the powers the Applicant is seeking through the order.
REP1-091.5	This area of the country is deeply affected by infrastructure. My client is aware of another operator (RWE) that dismissed bringing forward a proposal in this location as it is "too congested".	The Applicant has undertaken a rigorous and robust site selection as mentioned in REP1-091.2 above and is in discussion with the other developers connecting into the National Grid Bodelwyddan substation to understand timings and proposals for those projects.
REP1-091.6	Finally, we have been trying to engage with the Applicant's agents, Dalcour Maclaren, to discuss these issues. However, given the paucity of answers or explanations on the above it is extremely difficult to negotiate and/or prepare detailed evidence for submission to the inquiry.	The Applicant notes the response and is in the process of organising a meeting between the Applicant, Dalcour Maclaren and The Executors of the late David Watkins Williams-Wynn BT in late September where the Project and interaction with the wider estate will be discussed.

Reference	Written Representation Comment	Applicant's response
REP1-091.7	We look forward to participating fully in the examination process to continue to highlight the inadequacy of the Applicant's approach, and the inappropriate nature of the development.	The Applicant notes the response and welcomes the participation.

3 REFERENCES

Mengo, E., Mynott, F., and Muench, A. (2020) Welsh National Marine Plan: A review of the potential for co-existence of different sections in the Welsh Marine Plan Area. Available: https://www.gov.wales/sites/default/files/publications/2021-11/review-potential-co-existence-different-sectors-welsh-marine-plan-area.pdf. Accessed August 2024.

Marine Scotland (2017) Consultation on new controls in the Queen Scallop Fishery in ICES divisions VIa and VIIa. Available: https://www.gov.scot/binaries/content/documents/govscot/publications/consultation-analysis/2017/08/consultation-new-controls-queen-scallop-fishery-ices-divisions-via-viia-9781788511537/documents/00523599-pdf/00523599-pdf/govscot%3Adocument/00523599.pdf. Accessed August 2024.