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MONA OFFSHORE WIND PROJECT

Response to Conwy Borough County Council and Denbighshire County Council's Local Impact Report

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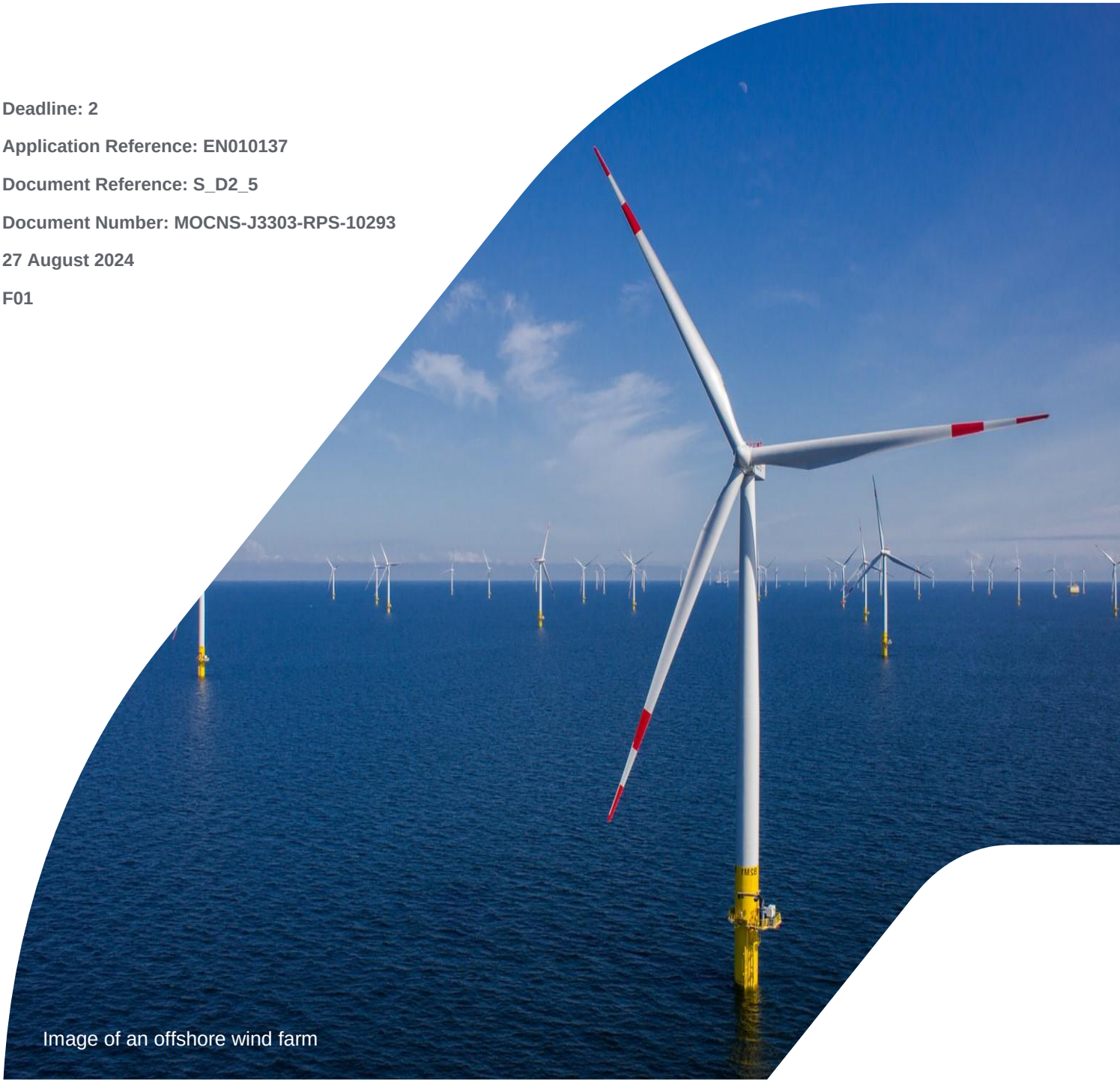

Image of an offshore wind farm

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Prepared by:

RPS

Prepared for:

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Appropriate Assessment	A step-wise procedure undertaken in accordance with Article 6(3) of the Habitats Directive, to determine the implications of a plan or project on a European site in view of the site's conservation objectives, where the plan or project is not directly connected with or necessary to the management of a European site but likely to have a significant effect thereon, either individually or in-combination with other plans or projects.
Bodelwyddan National Grid Substation	This is the Point of Interconnection (POI) selected by the National Grid for the Mona Offshore Wind Project.
Competent Authority	Regulation 6(1) defines competent authorities as "any Minister, government department, public or statutory undertaker, public body of any description or person holding a public office".
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Mona Offshore Wind Project.
Evidence Plan Process	The Evidence Plan process is a mechanism to agree upfront what information the Applicant needs to supply to the Planning Inspectorate as part of the Development Consent Order (DCO) applications for the Mona Offshore Wind Project.
Expert Working Group (EWG)	Expert working groups set up with relevant stakeholders as part of the Evidence Plan process.
Inter-array cables	Cables which connect the wind turbines to each other and to the offshore substation platforms. Inter-array cables will carry the electrical current produced by the wind turbines to the offshore substation platforms.
Interconnector cables	Cables that may be required to interconnect the Offshore Substation Platforms in order to provide redundancy in the case of cable failure elsewhere.
Intertidal access areas	The area from Mean High Water Springs (MHWS) to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities.
Intertidal area	The area between MHWS and MLWS.
Landfall	The area in which the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling.
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process. In addition,

Term	Meaning
	licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).
Maximum Design Scenario (MDS)	The scenario within the design envelope with the potential to result in the greatest impact on a particular topic receptor, and therefore the one that should be assessed for that topic receptor.
Mona 400kV Grid Connection Cable Corridor	The corridor from the Mona onshore substation to the National Grid substation at Bodelwyddan.
Mona Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, offshore export cables and offshore substation platforms (OSPs) forming part of the Mona Offshore Wind Project will be located.
Mona Array Scoping Boundary	The Preferred Bidding Area that the Applicant was awarded by The Crown Estate as part of Offshore Wind Leasing Round 4.
Mona Offshore Cable Corridor	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located.
Mona Offshore Cable Corridor and Access Areas	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located and in which the intertidal access areas are located.
Mona Offshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area encompassing and located between the Mona Potential Array Area and the landfall up to MHWS, in which the offshore export cables will be located.
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
Mona Offshore Wind Project Boundary	The area containing all aspects of the Mona Offshore Wind Project, both offshore and onshore.
Mona Offshore Wind Project PEIR	The Mona Offshore Wind Project Preliminary Environmental Information Report (PEIR) that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Offshore Wind Project Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Onshore Cable Corridor	The corridor between MHWS at the landfall and the Mona onshore substation, in which the onshore export cables will be located.
Mona Onshore Development Area	The area in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid substation will be located
Mona Onshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area located between MHWS at the landfall and the onshore National Grid substation, in which the onshore export cables, onshore substation and other associated onshore transmission infrastructure will be located.
Mona PEIR Offshore Cable Corridor	The corridor presented at PEIR that was consulted on during statutory consultation and has subsequently been refined for the application for Development Consent. It is located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables and the offshore booster substation will be located.

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

Term	Meaning
Wind turbines	The wind turbine generators, including the tower, nacelle and rotor.
The Planning Inspectorate	The agency responsible for operating the planning process for NSIPs.

Acronyms

Acronym	Description
AfL	Agreement for Lease
BEIS	Department for Business, Energy and Industrial Strategy
BNG	Biodiversity net gain
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
EWG	Expert Working Group
HVAC	High Voltage Alternating Current
IEF	Important Ecological Feature
IEMA	Institute for Environmental Management and Assessment
ISAA	Information to support the Appropriate Assessment
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
NBB	Net Benefits for Biodiversity
NRW	Natural Resources Wales
NSIP	Nationally Significant Infrastructure Project
NTS	Non-Technical Summary
OSP	Offshore Substation Platform
PDE	Project Design Envelope
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
POI	Point of Interconnection
SAC	Special Area of Conservation
SoCC	Statement of Community Consultation
SPA	Special Protection Area
TCE	The Crown Estate
WTW	Wildlife Trust Wales
TWT	The Wildlife Trusts

Units

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

1 Response to Conwy Borough County Council and Denbighshire County Council's Local Impact Report

1.1 Introduction

1.1.1.1 The Applicant has responded to Conwy Borough County Council and Denbighshire County Council's Local Impact Report below.

1.1.1.2 The Applicant has not responded to all the introductory text unless a response is required to address a statement.

1.2 Response to Conwy Borough County Council and Denbighshire County Council Local impact report

Table 1.1: Conwy Borough County Council and Denbighshire County Council

Reference	Written Submission Comment	Applicant's response
REP1-049.1	1.2.2 The onshore substation infrastructure The proposed Mona Onshore Substation would contain a number of elements including but not limited to switchgear, busbars, transformers, capacitors, reactors, reactive power compensation equipment, filters, cooling equipment, control and welfare buildings, lightning protection masts and internal road access. It is suggested by the Applicant that a security fence would also be required around the onshore substation compound. It is recognised that the largest building structure for the onshore substation will have a maximum height of 15 m above the finished ground level. All other equipment (e.g. transformers, harmonic filters) would not exceed 15 m above finished ground level with the exception of slender lightning masts which could be up to 30 m in height. The total permanent land requirement for the Mona Onshore Substation to the perimeter fence is 65,000 m2. Overall, 250,000 m2 will be required to accommodate both on onshore substation footprint and the associated temporary construction areas. A detailed description of development can be found in the Applicant's ES Chapter 3 Project Description [APP-050].	The Applicant notes the response, but can confirm that 215,000m2 will be required to accommodate both the onshore substation footprint and associated temporary construction areas. This is a combination of 65,000m2 for the onshore substation footprint plus a 150,000m2 onshore substation temporary construction compound. These details are stated in Table 3.34 and Table 3.35 in Volume 1, Chapter 3: Project Description (APP-050).
REP1-049.2	1.3.2 Designated and non-designated assets The Applicant recognises, in its ES Volume 3 [APP-064 – APP-074], the large number of designated and non-designated assets within the study area for the various onshore components, including but not limited to; approximately 7 Sites of Special Scientific Interest (SSSI), 10 Special Areas of Conservation (SACs) and 49 sites of historic relevance (such as Listed Buildings, Registered Parks and Gardens, scheduled	The Applicant can confirm that the Onshore Ecology Chapter (APP-066) identifies 6 Sites of Special Scientific Interest and 10 Special Areas of Conservation within the onshore ecology study area and that the Historic Environment chapter (APP-068) identifies 46 designated historic assets (excluding Grade II Listed Buildings) within the historic environment study area.

Reference	Written Submission Comment	Applicant's response
	monuments). Upon review of the topic specific chapters, the Councils largely agree with the baseline description of such features presented within the Applicant's ES Volume 3 [APP-064 – APP-074] (onshore) and consider that it is an appropriate representation of the existing environment and landscape for which the onshore elements of the project are proposed. Specific areas of baseline information that it is considered require further information, in relation to technical assessment, are highlighted in Chapter 3 of the LIR. The Councils reiterate the environmental, cultural, historic and landscape significance of the area in which the onshore elements of this project are proposed.	
REP1-049.3	3. Assessment of Local Impacts 3.1 Introduction This chapter of the LIR provides a commentary on specific topic areas identified by the Councils as having the potential to impact on their local areas. For each topic, an assessment of those likely impacts has been undertaken and is reported on. This includes consideration of the Applicant's assessment and evidence as provided in the DCO application, consideration of potential effects, and a review of any proposed mitigation or management measures. This LIR considers the following topics: • Landscape/seascape and visual impact • Ecology and biodiversity • Highways, traffic and transport • Water environment • Noise and vibration • Trees and arboriculture • Heritage (provided by HENEB42) • Cumulative impacts • Draft DCO Whilst the above topics are considered by the Councils to be the key areas of focus at time of preparing this	The Applicant notes this and provides responses to the matters raised below.

Reference	Written Submission Comment	Applicant's response
	LIR, the Councils reserve the right to comment on other topics as relevant and/or necessary during the DCO examination.	
REP1-049.4	3.2 Principle of development The suite of NPSs for Energy designated in January 2024 establish the need for new renewable energy generation. In particular, the overarching NPS for Energy (NPS EN-1) identifies a strengthened presumption in favour of nationally significant low carbon infrastructure, or 'Critical National Priority' (CNP) infrastructure. In their representations in response to pre-application statutory consultation in June 2023, the Councils confirmed that they hold no objection to the principle of development. The Councils retain this position and recognise the status of the Mona Offshore Wind Farm as CNP infrastructure under NPS policy. Whilst the Councils are not in objection to the proposals in principle, they retain concerns over some of the potential impacts of the development as outlined in the remainder of this report. Where appropriate, the Council has suggested mitigation or specific actions that may aid in addressing the outstanding concerns. Whilst not specifically considered within this LIR, the Councils additionally acknowledge and share concerns raised by the National Farmers Union (NFU) [PDA-048] regarding cable depths and the potential impact on agricultural land, and affected landowners, in undertaking agricultural operations. This chapter of the LIR also makes several references to the submission by NRW [RR011] where relevant; the Councils are broadly supportive of the matters raised by NRW.	The Applicant notes this and provides responses to the matters raised below. The Applicant has responded to the NFU's written submission in REP1-011 (section 1.10) and to NRW's relevant representation in PDA-008 (section 2.11).
REP1-049.5	3.3 Landscape/seascape and visual impact 3.3.1 Information reviewed In undertaking this review the following documents are referenced and have been reviewed: • F3.6 ES Landscape and Visual Resources [APP-069] • F7.6.1 ES Landscape and Visual Resources Planning	The Applicant notes the response and comments on the matters raised below.

Reference	Written Submission Comment	Applicant's response
	Policy Context [APP-152] • F7.6.2 ES Landscape Character Baseline Technical Report [APP-153/4] • F7.6.3 ES Visual baseline technical report - onshore development [APP-155] • F7.6.4 ES Landscape, Seascape and Visual Resources Impact Assessment Methodology [APP156] • F7.6.5 ES Landscape Visualisations [APP-157-159] • F7.6.6 Tree survey and arboriculture impact assessment [APP-160-167] • F6.8.5 ES International and nationally designated landscape study [APP-105] • J22 Outline Landscape and Ecology Management Plan [APP-208] • J26.18 Outline arboriculture method statement [APP-230] • J3 Design Principles [APP-189] • J26.10 Outline Artificial Light Emissions Plan [APP-222] • Relevant statutory consultation responses and Relevant Representations	
REP1-049.6	This section presents observations in respect of the seascape, landscape and visual impact assessment (SLVIA) for the Mona Offshore Wind Farm and where relevant supporting information is included with the application. In approaching this review, steps have been taken to consider best practice for SLVIA, the reasonable expectations of the project and the assessment (including recommendations included within PINs Advice Note 743) and the context within which the Councils are being requested to comment on the DCO application.	The Applicant notes this and provides responses to the matters raised below.
REP1-049.7	3.3.2 Assessment methodology In reviewing the above documentation, the Councils have identified some fundamental concerns with the methodology and approach underpinning the SLVIA:	<u>Ambiguity over the methodology used</u> The Mona SLVIA is presented in Volume 2, Chapter 8: Seascape and Visual Resources (APP-060). The methodology for the SLVIA is summarised within the chapter. The detail

Reference	Written Submission Comment	Applicant's response
	a) Ambiguity over the methodology used Generally, the SLVIA is considered to be well structured and the scope of the assessment is proportionate. • This review has considered the various methodologies presented with the Scoping Report and in the Preliminary Environmental Impact Report (PEIR). The overall Environmental Impact Assessment (EIA) method and assessment criteria was presented in the Scoping Report, at PEIR and in the submitted Environmental Statement (ES). The SLVIA method was not included in the Scoping report, but it was presented at PEIR and is within the submitted ES. The level of detail provided in the SLVIA method presented in ES Chapter 3.6 is appropriate. However, the Assessor presents two SLVIA methodologies; • one at Section 6.6 in the main chapter; and • another more detailed one at Volume 7, Annex 6.4: Landscape, seascape and visual impact assessment methodology	of the methodology is set out in Volume 6, Annex 8.4: Seascape, landscape and visual impact assessment methodology (APP-104). The Mona LVIA is presented in Volume 3, Chapter 6: Landscape and visual resources (APP-069). The methodology for the LVIA is summarised within the chapter. The detail of the methodology is set out in Volume 7, Annex 6.4: Landscape, seascape and visual impact assessment methodology (APP-156). The SLVIA and LVIA have followed the same methodology for consistency. <u>Significance of effect</u> The SLVIA and LVIA methodologies as set out in Volume 6, Annex 8.4: Seascape, landscape and visual resources impact assessment methodology (APP-104) and Volume 7, Annex 6.4: Landscape, seascape and visual impact assessment methodology (APP-156) and summarised in Volume 2, Chapter 8: Seascape and visual resources (APP-060) and Volume 3, Chapter 6: Landscape and visual resources (APP-069), are considered to be transparent, robust and in accordance with best practice. National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) (DESNZ, 2024a) requires an SLVIA to be undertaken in accordance with the latest Offshore Energy SEA, including the White Consultants (2020) report. White Consultants (2020) cites DTI (2005) and GLVIA3 (Landscape Institute, 2011) as key guidance. EIA guidance (contained in 'The state of environmental impact assessment in the UK' (Institute of Environmental Management and Assessment (IEMA), 2011; section 6.3, page 60) notes that *"In reporting the EIA's findings, ESs often set out a generic methodology at the start of the document indicating that significance has been assessed using a standard matrix style approach, with magnitude on one axis and receptor sensitivity on the other"* … *"Despite this, it remains relatively common for one or more ES chapters to use an alternative approach. This is not a legal concern, as there is no regulatory requirement to apply the same methodological approach to significance evaluation across an EIA"*. The Applicant acknowledges that the assessment methodologies used for SLVIA and LVIA chapters are different from the other topic chapters within the Environmental Statement, however the Applicant notes that this supported by the EIA guidance from IEMA (2011) and GLVIA3 (Landscape Institute, 2011). The assessment methodologies for both the SLVIA and the LVIA are derived from GLVIA3 (Landscape Institute, 2011). GLVIA3 does not promote the use of matrices, and the assessment of significance should be undertaken through the application of professional judgement.
REP1-049.8	This approach has caused confusion as it is not clear which methodology has been used in the assessment. Furthermore, the SLVIA methodologies also differ considerably from the EIA method detailed in F1.5 Mona ES Environmental Impact Assessment Methodology [APP-052], in which the following two paragraphs assert that: *5.3.6.16 Professional judgement is used to define the magnitude of impact and receptor sensitivity. The matrix is then used, together with professional judgement, to evaluate the significance of effect. The significance may be one, or a range of, no change, negligible, minor, moderate or major. In general, a significance of effect of moderate or greater is considered 'significant' in EIA terms. For each topic chapter, what is considered 'significant' will be clearly*	

Reference	Written Submission Comment	Applicant's response
	defined. Where further mitigation is not possible a residual significant effect may remain. *5.3.6.17 In cases where a range is suggested for the significance of effect, there remains the possibility that this may span the significance threshold (i.e. the range is given as minor to moderate). In such cases the final significance is based upon the expert's professional judgement as to which outcome delineates the most likely effect, with an explanation as to why this is the case.* It is not clear why the SLVIA method should differ considerably from the overall ES methodology. This requires justification by the Assessor.	The significance of effect matrix (see Table 8.15, Volume 2, Chapter 8: Seascape and visual resources (APP-060) and 6.17, Volume 3, Chapter 6: Landscape and visual resources (APP-069)) identifies that a small magnitude of impact experienced by a high sensitivity receptor could result in a moderate effect, which in some circumstances can be considered as a significant effect , to be judged on a case by case basis. For the purposes of the Mona SLVIA and LVIA 'moderate' effects can be either significant or not significant, depending on the context of the resource or receptor. White Consultants (2020; paragraph 2.2) guidance states '*The interpretation of the threshold of significance was derived from a 'worst case' scenario/the MDS in the DTI (2005) seascape and visual impact assessment guidance which states that moderate adverse effects could be judged as significant (although it is most likely they are not).*' When judging the overall significance of effect, GLVIA3 (Landscape Institute, 2011) reiterates the need to clearly distinguish between effects which are significant and those which are not. At paragraph 3.32, GLVIA3 (Landscape Institute, 2011) explains that there are no hard or fast rules about what effects should be deemed to be significant. GLVIA3 (Landscape Institute, 2011; paragraph 5.54) goes on to state *"significance can only be defined in relation to each development and its specific location."* <u>Split assessment categories</u> The use of split categories when judging the significance of effects is not unusual for SLVIA or LVIA. A split category of magnitude of impact or sensitivity of receptor will usually result in a split category in the significance of effect. For example, Table 5.3 of White Consultants (2020) (referred to in NPS EN-3 (DESNZ, 2024a; paragraph 2.8.208) uses split categories for significance of effect. The use of split categories (in relation to offshore wind farms) is explained in White Consultants (2020; paragraph 5.45). In judging landscape effects, GLVIA3 (Landscape Institute, 2011; paragraph 5.54) explains *"significance can only be defined in relation to each development and its specific location."* In judging visual effects GLVIA3 (Landscape Institute, 2011; paragraph 6.42) explains *"Significance of visual effects is not absolute and can only be defined in relation to each development and its specific location."* The Applicant's SLVIA significance matrix presents levels of significance that include negligible to minor, minor to moderate and moderate to major. Each of these categories represents a range, hence the use of the 'to' term. This approach accords with the stated GLVIA3 guidance (Landscape Institute, 2011; paragraph 3.32) and reflects the fact that effects experienced by a resource or receptor are graded/- a continuum, rather than change at threshold, based on distance, height or numbers.
REP1-049.9	It is considered that there are two important methodological aspects that have caused the assessment to be unclear and which call into question the validity of the judgements made on the significance of effects throughout the assessment: 1. how the threshold of significance, and its reporting, differs from the main EIA Methodology used by other disciplines and from a best practice perspective in LVIA; and 2. how the use of split significance categories has led to lack of clarity in the reporting of effects. The Isle of Anglesey Council's S42 response at Table 6.7 under 'Consultation in the SLVIA Chapter' states that: *"…The threshold for measuring significant effects needs amending and supports the argument that any effect classified Moderate or greater is considered 'significant' as this is considered to align with common practice. However, the LVIA mentions that only effects with a significance level of Substantial or Major are deemed to be significant.* *Split categories have been used in the assessment of sensitivity and magnitude. The council advocates that*	

Reference	Written Submission Comment	Applicant's response
	this is not aligned with best practice and rectifying this would help to improve clarity. The Council suggests, that where effects fall into matrices of dual categories, for example a receptor or group of receptors that receives a range of effects, that might vary geographically or with the seasons; the LVIA should confirm which level applies in each case and provide an explanation to justify each decision." The Councils agree with the Isle of Anglesey Council's feedback on these methodological issues. The simple and clear use of categories to describe and explain the significance of effects is particularly important in relation to effects which lie on near to the cusp of the significance threshold. Many of the predicted landscape, visual effects and cumulative effects on receptors sit on or around the significance threshold. The SLVIA methodology and the way it has been applied to the assessment makes it difficult for the reader to clearly understand the overall significance of the effects.	<u>Isle of Anglesey Council feedback</u> The Isle of Anglesey County Council (IoACC) are now in agreement with the applicant regarding the methodology, as documented in the Initial Statement of Common Ground between Mona Offshore Wind Project and Isle of Anglesey County Council (IoACC) (REP1023).
REP1-049.10	***b) Significance threshold*** The SLVIA states at 6.6.2.8 "*For the purposes of this assessment, any effects with a significance level of substantial or major have been deemed significant in terms of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. In general, any effects with a significance level of moderate or less have been judged as not significant."* This is contrary to the overarching EIA methodology paragraph 5.3.6.16, cited above. In previous consultation, the Applicant cites a 19-year-old piece of DTI 2005– *'Guidance on the Assessment of the Impact of Offshore Wind Farms: Seascape and Visual Impact Report'* to justify the assertion than moderate effects are generally not significant, but feasibly could be. It is not considered appropriate to use this out-of-date guidance which bears no specific	

Reference	Written Submission Comment	Applicant's response
	relevance to the assessment of onshore landscape and visual effects. This approach has contributed to the confusion in the assessment methodology and in the reporting of the significance of effects. A medium, or moderate level of effect is usually used as the threshold for effects being considered significant. As per the assessment methodology, moderate landscape and visual effects are those which are '**demonstrably out of scale or at variance with**' the baseline. The councils consider that such effects should be considered significant.	
REP1-049.11	***c) Split assessment categories*** In previous consultation responses the Applicant has cited the DTI 2005 guidance to justify the use of split significance categories when an effect on a receptor can be for example 'moderate to major' rather than 'moderate' or 'major'. Table 6 on page 80, the DTI Guidance uses a forward slash '/' rather than the word 'to' in their split categories in (e.g. 'Moderate/Minor'). However the Applicant's SLVIA significance matrix at table 6.17 in Doc. F3.6 instead uses 'Moderate to Minor'. In terms of definition, the symbol '/' is used between words to replace the word 'or' where arguably either word but only one should be chosen instead of the other, so the reader expects the Assessor to choose the most appropriate (where use of a forward slash in this context is taken to mean 'or' rather than 'to'). This is consistent with the overarching EIA Method which presents split categories using 'or' and not 'to'. There is an important distinction between the meaning of these two terms to and or. The Applicants use of the 'to' term is assumed to mean a range; where the level of significance lies somewhere on a scale between, for example 'Moderate' and 'Major'. This requires justification by the Assessor.	

Reference	Written Submission Comment	Applicant's response
REP1-049.12	Highlighted example To highlight both of these methodological issues, the below is cited an example from the SLVIA. It relates to effects on equestrians, cyclists and walkers using the road network at Hendy Farm (Viewpoint 2). At 6.11.2.21 and 6.11.2.25, there are two very different justifications for assessing the sensitivity of these receptors with value ranging from **negligible** to **medium** and the susceptibility ranging from **medium** to **high**. The sensitivity of these receptors is assessed at **low** to **medium**. Due to the use of the split category, it is unclear if the different receptor types have different levels of sensitivity, some 'low' and some 'medium', or whether they all have 'low to medium' sensitivity. If it is the former, the Assessor should separately assess and present each receptor's sensitivity, if it is the latter the Assessor should decide whether and explain why these receptors have low or medium sensitivity.	The Applicant is aware of some erroneous references within Volume 3, Chapter 6: Landscape and visual resources (APP-069) which are corrected in the errata sheet submitted at Deadline 1 (REP1-044). In paragraphs 6.11.2.21 and 6.11.2.25 of Volume 3, Chapter 6: Landscape and visual resources (APP-069), the susceptibility of the receptor should be characterised as medium to high, and the sensitivity of the receptor should be characterised between medium and high. The corresponding text in paragraphs 6.11.2.22 and 6.11.2.26 has also been corrected within the errata. This does not alter the significance of the effect, which remains major adverse, as the sensitivity of the receptor was assessed as high, although not explicitly stated.
REP1-049.13	For the same receptors, the judgments made in combining these sensitivity assessments with magnitudes of change from construction and operation are also inconsistent and unclear, as follows: • *At 6.11.2.22 'Overall, the magnitude of the visual impact experienced by people at this representative viewpoint during construction and decommissioning is large and the sensitivity of the receptor is low to medium. The temporary effects will be* ***moderate to major adverse, which are not significant to significant****.'* • *At 6.11.2.26 'Overall, the magnitude of visual impact caused by the onshore elements within the Mona Onshore Development Area during operations and maintenance and experienced by people at this viewpoint is medium. The sensitivity of the receptors varies between low and medium. The effects will be major adverse at Year 1 winter reducing to moderate*	

Reference	Written Submission Comment	Applicant's response
	adverse at Year 15 summer as the landscape mitigation (shown on Figure 6.5) matures, ***which are significant to not significant effects.'***	
REP1-049.14	The Councils consider that this assessment is confusing, inconsistent and does not clearly conclude whether the effects are significant or not. The example provided above relates to just one assessment of visual effects, highlighting: • the problems with using split categories as ranges; • unclear and inconsistent assessments; and • that the significance of effects is not clear. The issues highlighted above should be reviewed and the Councils request that the Applicant either provide an updated assessment that addresses the Councils' concerns, or respond to justify and elaborate where necessary the methodology used, and to clarify whether the intent as part of the methodology is: 1. to judge effects as one or the other of the categories defined in Table 6.18 as either 'major' or 'moderate' or, on the other hand; 2. whether the Assessor intends to use 'Moderate to Major' as a separate significance category. If the former the Applicant should amend their methodology to use a '/' or 'or' instead of 'to'. This would mean revisiting each assessment to select and justify which of the categories each effect falls into. If the latter, the Applicant should revisit the methodology to define all of the split categories in Table 6.18. Guidelines for Landscape and Visual Impact Assessment (GLVIA) states in paragraph 3.34 that: *"Descriptions should be provided for each of the categories to make clear what they mean…'*	The Applicant confirms that the SLVIA and LVIA methodology has been developed in accordance with best practice guidance including GLVIA3 (Landscape Institute, 2011) as detailed in responses above. There is often a change in the magnitude of impact experienced by a visual receptor using a linear route, or a large area of publicly accessible open space. This is due to distance or visibility of a proposed development. The sensitivity of the receptor however remains the same. Therefore, for the same receptor on the same linear route (for example) the significance of effect will vary.

Reference	Written Submission Comment	Applicant's response
	However, this latter option is not advisable as there would then be a total of eight different significance categories (excluding 'no change'). This would be contrary to GLVIA, which also states at 3.27 (2.) that "Word scales, with ideally three or four but a maximum of five categories, are preferred as the means of summarising judgements for each of the contributing criteria."	
REP1-049.15	3.3.3 Baseline Assessment and use of LANDMAP The selection of scope of landscape receptors and the viewpoints representing a range of visual receptors included in the SLVIA is adequate. The baseline drawn seems to be appropriate and proportionate to the proposed onshore aspects of the proposed development. Exceptions to this are the issues raised above around the methodology and its application in defining the baseline. In addition, it is unclear to the Councils whether the baseline assessment has used all LANDMAP Aspect Areas (AAs) in drawing a comprehensive Landscape baseline. LANDMAP is holistic and to understand the overall character of an area, all AAs need to be considered. For example, where there are high or outstanding Cultural historic or habitat AAs within the study area these contribute to the overall character of the landscape and need to be included in the assessment of the value of the landscape, its overall character and susceptibility to the proposed change. This, along with the contribution other aspects make to the overall character, can be reported at the level of visual and sensory aspect areas (V&SAAs) units. NRW advises[44]: "*For each LANDMAP dataset, you should also consider the geological landscape, landscape habitats, visual and sensory receptors, the historic landscape as well as cultural services."*	The Applicant notes and acknowledges that the selection and scope of landscape receptors and viewpoints set out in the baseline is deemed to be adequate. Regarding LANDMAP Aspect Areas, these are identified and described in Volume 7, Annex 6.2: Landscape and seascape character baseline technical report (APP-153), which includes summary descriptions and evaluations of all LANDMAP Aspect Areas with the potential to be affected by the Mona onshore development. Those LANDMAP Aspect Areas taken forward to assessment are detailed in Table 6.13 and assessed in section 6.10.5 of Volume 3, Chapter 6: Landscape and visual resources (APP-069).

Reference	Written Submission Comment	Applicant's response
	At paragraph 1.3.10.5 in Document F7.6.2 Mona ES Landscape Character Baseline Technical Report [APP-153/4], the Assessor states that: *"the other LANDMAP Aspect Area layers might have lent value to the visual and sensory layers…"* The Applicant is asked to clarify if and how the holistic suite of LANDMAP Aspects were referenced and used in evaluating the value of each landscape character area receptor and where this is reported in the submitted documents.	
REP1-049.16	3.3.4 Potential Effects It should be noted that this review has not included reference to the summary assessment results presented in Table 6.24: Summary of potential landscape and visual effects, mitigation and monitoring. This is because the Councils consider there are too many errors or inconsistencies in this table, when reviewed alongside the more detailed narrative parts of the assessment. For example, for representative viewpoint 2, construction and demolition effects are recorded as 'moderate to major' adverse (not significant) and several effects on LANDMAP Aspect Areas are recorded as 'moderate' or 'minor' adverse (significant) as well as 'moderate 'or 'minor' adverse (not significant). For the benefit of the reader and ExA, the Applicant should review and update this summary table to correct inconsistencies. The Council's comments on potential effects are provided below. ***Visual receptors in Clwydian Range AONB and Offa's Dyke*** Impact on distant views from Clwydian Range AONB	The Applicant notes there were a number of inconsistencies between the assessment and the summary tables in Volume 3, Chapter 6: Landscape and visual resources (APP-069). These tables have been updated and are appended to thise response to the LIR. Regarding visual receptors in Clwydian Range AONB and Offa's Dyke, the Applicant acknowledges that the assessment is deemed to be robust and correct. Regarding concerns about potential impacts of the development on views from the Clwydian Range and Dee Valley NL, the Applicant refers to the landscape and visual receptors documented in the baseline Volume 7, Annex 6.2: Landscape and seascape character baseline technical report (APP-153) which were selected in accordance with the methodology and the subject of consultation, including with NRW, and are considered adequate to inform a robust assessment. Regarding the cumulative effects of the Mona Onshore Substation with other developments when viewed from the Clwydian Range and Dee Valley NL and Offa's Dyke Path National Trail, the Applicant has provided a robust assessment of the effects on visual receptors and on the special qualities of the NL both within Volume 6, Annex 8.5: International and nationally designated landscape study (APP-105) and Volume 3, Chapter 6: Landscape and visual resources (APP-069). Local landscape and visual cumulative effects are considered within the agreed study area of 10 km from the outer edges of the Mona Onshore Substation platform. The cumulative effects of the Mona Onshore Substation are assessed in Volume 3, Chapter 6: Landscape and visual resources (APP-069). The Applicant maintains that the cumulative effects assessment on both landscape character and views and visual amenity experienced by visual receptors is also robust and correct.

Reference	Written Submission Comment	Applicant's response
	and Offa's Dyke are a key concern for the Councils. It is agreed that the assessment of these visual effects is robust and correct in that a negligible magnitude of change to these very high sensitivity receptors will result in minor adverse visual effects. Elected Members reiterate local concerns regarding the potential impacts of the development on views from the AONB and further afield, including in combination with other proposals, and the effect on local landscape character.	
REP1-049.17	***Visual effects on Denbighshire Memorial Park and Crematorium*** Visual impacts on people visiting the crematorium have not been assessed. The Councils have therefore referred to the assessments made on other nearby highly sensitive receptors such as those represented by VP 5. At paragraphs 6.11.1.28-30, the sensitivity of people using the local road network is assessed as high for walkers (and equestrians), medium for cyclists and low for people in vehicles. This is agreed and it is considered that visitors to the crematorium are also highly sensitive to changes in their views. The receptors considered by the Applicant are predicted to receive medium to large magnitudes of change (6.11.1.27), resulting in major and significant effects during construction and medium magnitudes of change (6.11.1.35), resulting in moderate and significant effects during operation. Reviewing this has highlighted another instance where the submitted Assessment is confusing, inconsistent and not robust, as follows. In Section 6.11.2, at Paragraphs 6.11.2.8, 12, 25, 58 and 63, these same receptors are recorded as being of low to medium sensitivity. In addition to this discrepancy, the corresponding significance paragraphs, e.g. 6.11.2.64 record sensitivity as high.	Visitors to the Denbighshire Memorial Park and Crematorium are high sensitivity visual receptors. However, the magnitude of impact on views from the Memorial Park will be limited due to screening by buildings, woodland, copses, trees and hedgerows, both within the grounds of the Memorial Park and in the intervening farmed landscape. In similar views from this location the 400 kV line is present in views towards the Mona onshore substation. Representative viewpoint 4 (view southeast from public footpath 105/7 to the southwest of Waen-Meredydd) is relevant to the visual impacts that could be experienced by individuals within the Memorial Park insofar asas it shares a similar view direction and receptor sensitivity (high). However, representative viewpoint 4 is located closer to the Mona Onshore Substation than the Memorial Park and has less intervening vegetation so presents a worse case effect. The assessment of visual effects from representative viewpoint 4 is not significant, the available views from the Memorial Park would be similarly not significant.

Reference	Written Submission Comment	Applicant's response
	Furthermore, the magnitude level in 6.11.2.64 is not consistent with that assessed in 6.11.2.62. The Councils are of the opinion that users of the crematorium are highly sensitive receptors and will experience a medium magnitude of change in their view during construction and a low magnitude of change during operation. This would result in a major adverse and significant visual effect during construction and a moderate adverse and significant effect during operation. The Councils request that the Applicant should review and update the assessment to clarify or correct inconsistencies.	
REP1-049.18	***Cumulative Landscape and visual effects*** At paragraph 6.14.3.56 the sensitivity of the users of public rights of way within 1 km of the Onshore Substation is recorded as medium to high. At paragraph 6.11.1.28 earlier in the report, the same receptors are recorded as having high sensitivity to the changes proposed. As there are no cumulative assessment specific criterial, it is assumed these two sensitivity judgements were made using the same judgements and criteria in the overall SLVIA method. The Councils are of the opinion that the high sensitivity is the correct judgement here. Within 1km of the proposed Mona substation, receptors would concurrently, or within a short journey, be able to see the proposed development together with Tier 1 Awel y Môr onshore substation and the Tier 3 St. Asaph solar farm, the extension to National Grid's Bodelwyddan substation, and existing onshore wind schemes. These are all major developments with their own associated visual effects on receptors. At paragraph 6.13.3.1 the Assessor rightly asserts: '*For a cumulative effect to occur, an additional effect*	Regarding Cumulative Landscape and visual effects, the Applicant confirms that the sensitivity of users of the public rights of way network, including the Wales Coast Path is high, and the sensitivity of users of Offa's Dyke National Trail is very high. The cumulative effects assessment is presented in section 6.13 of Volume 3, Chapter 6: Landscape and visual resources (APP-069) and at Table 6.22 presents an assessment of the Awel y Môr, St. Asaph solar farm and the extension to National Grid's Bodelwyddan substation, as well as other projects scoped into the cumulative effect assessment. The types of cumulative visual impact are set out at paragraph 6.13.3.10 of Volume 3, Chapter 6: Landscape and visual resources (APP-069), which refers to the definitions in GLVIA3 (Landscape Institute, 2011; Table 7.1). With regard to sequential views GLVIA3 (Landscape Institute, 2011; Table 7.1) explains that a sequential effect may occur when an observer travels *"along regularly used routes such as major roads or popular paths".* The Applicant notes there are PRoW to the west of the Mona Onshore Substation (and these are represented in viewpoints 3 (view east-southeast from public footpath 105/6 to the east of Pentre-mawr) and 4 (view southeast from public footpath 105/7 to the southwest of Waen-Meredydd)), however they are located further from the Mona Onshore Substation when compared to viewpoints 1 (view southeast along farm track from minor road to Tyddyn Meredydd) and 2 (view north from minor road adjacent to Henry Farm). With regards to viewpoints 1 and 2, the Applicant has assessed the possibility of walkers using the minor roads at these locations. The Applicant notes there are no national trails or promoted long distance footpaths in close proximity to the Mona Onshore Substation. . Cumulative projects are taken in their entirety, just as the standalone effects of the Mona Onshore Substation is, as the projects would not be permitted without the associated

Reference	Written Submission Comment	Applicant's response
	must arise over and above the likely effect of implementing the Mona onshore transmission, measured against baseline conditions.' Later in the assessments, however, the Assessor relies upon the mitigation applied to each scheme to justify a reduced 'negligible' magnitude of change. The Councils consider this approach to be incorrect and misleading because the mitigation for each scheme is designed to address its own effects, whereas this cumulative assessment should address the potential for additional effects over and above the residual effects predicted for each development in isolation.	mitigation. However, the Mona Offshore Wind Project does not rely on other projects' mitigation to reduce its effects, cumulative or otherwise.
REP1-049.19	There is no mitigation provided specifically to address cumulative effects. Without any cumulative impact mitigation, the Council's assert that there would be a small magnitude of cumulative change, combined with a high sensitivity, would result in moderate adverse and significant cumulative visual effects. It is agreed that moderate adverse cumulative visual effects correctly predicted on highly sensitive visual receptors using Offa's Dyke, and Access Land within the Clwydian Range and Dee Valley NL would result in moderate adverse cumulative effects, which are not significant. However, these effects are considered by the Councils to be significant. The Councils are of the opinion that in combination, these schemes and the proposed development would have the cumulative effect of altering the landscape and visual environment to the extent that energy infrastructure would become a prominent or defining aspect of the local landscape and views. As such, the Councils would like to see appropriate and	The mitigation measures proposed for the Mona Onshore Substation are presented in Figure 6.5 and are described in section 6.8 of Volume 3, Chapter 6: Landscape and visual resources (APP- 069), the Outline LEMP (Document Reference J22) (APP-208) and the Design Principles Document (Document Reference J3) (APP-189). These are deemed sufficient to mitigate against significant cumulative effects with other projects, which will have their own mitigation, for such purposes. The Mona Offshore Wind Project does not rely on other projects' mitigation to reduce its effects, cumulative or otherwise. The Applicant notes the agreement by the Councils' landscape consultant to the Applicant's assessment of effects on users of the Clwydian Range and Dee Valley NL, and people walking along Offa's Dyke Path National Trail. The Applicant notes that NRW's position on the same receptors is that the proposed landscape mitigation reduces the potentially significant visual effects (RR-011, paragraph 3.1.1.6). The Applicant disagrees that there will be potentially significant cumulative effects without mitigation given the distance to the receptors and that the baseline landscape (featuring mature hedgerows and trees and areas of woodland) provides screening, along with the mitigation from the Mona Offshore Wind Project, will limit the extent of the cumulative effects. The Applicant believes that the mitigation proposed is proportionate to mitigate the standalone and the cumulative effects that might arise on both landscape and visual effects, due to the Mona Offshore Wind Project.

Reference	Written Submission Comment	Applicant's response
	proportionate mitigation included and secured within the DCO application to address the additional cumulative effects predicted. The Councils are happy to discuss with the Applicant any options and delivery as further on-site mitigation or off-site enhancement measures. This should be developed by the Applicant through the examination process and planned as a proportionate contribution from the Applicant. This should ideally be negotiated through collaboration with the other relevant developers.	
REP1-049.20	***Nighttime visual effects*** Nighttime effects are scoped out of the assessment. We are satisfied that this aspect is covered adequately as the Applicant commits in Table 6.2 in response to requirements set out in Paragraph 5.10.21 and 5.10.22 of NPS EN-1 that: *'During the construction phase no work will be undertaken during hours of darkness. The Onshore Substation will not be lit at night. Should maintenance work be required during hours of darkness emergency lighting will be used.'* The Councils note that current construction hours allow for work in hours that are likely to be dark (see Part 4 of this LIR for further comment on working hours). Additionally, the Project Description [APP-050] makes multiple references to the potential need for task lighting during winter months and operational lighting relating to security, car parking and repair/maintenance (paragraph 3.7.3.14, 3.7.3.31-33). It is noted that the ecological assessment references lighting and mitigation measures for controlled lighting relating to potentially affected species. The Applicant is asked to clarify the correct position accordingly. Assuming the Project Description is correct, the	Task-related lighting at the temporary construction compounds has been assessed, as detailed in Table 6.19 of Volume 3, Chapter 6: Landscape and visual resources (APP-069). During the operations and maintenance phase, the Mona Onshore Substation will not be permanently lit, as it is an un-manned substation. As described in paragraph 3.7.3.33 of Volume 1, Chapter 3: Project Description (APP-050), security lighting and car park lighting (as well as maintenance task lighting) may be provided at the Mona Onshore Substation during operation. Maintenance work would only take place during hours of darkness in an emergency. An operational lighting strategy is secured as Requirement 16 of the Draft DCO (C1 F04). The text within Table 6.2 of Volume 3, Chapter 6: Landscape and visual resources (APP-069) erroneously confirmed that no construction would undertake during hours of darkness. This is amended in the errata sheet submitted at Deadline 1 (REP1-044) to confirm the use of 'task-related' lighting for construction works only during hours of darkness.

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	Councils consider that the SLVIA needs to include an assessment of construction lighting on nighttime views and landscape character accordingly. Conversely, if construction is to be limited to daytime hours as asserted in the SLVIA, it is suggested that a DCO requirement is drafted that controls the timing of construction activities and any associated lighting to defined hours and that any emergency lighting is agreed in advance with the relevant planning authority.	
REP1-049.21	3.3.5 Mitigation Notwithstanding the points made that may be relevant to mitigation above, the Councils generally consider the approach to mitigation and the landscape design as presented to be appropriate and adequate to address the effects predicted in the submitted SLVIA. However, any changes to the assessment by the Applicant in response to the comments provided on the methodological issues discussed above could have considerable implications on the outcomes of the assessment of landscape, visual and cumulative effects and their significance. If following any update to the assessment, additional significant effects are identified, then it may be necessary for the Applicant to review and amend or add to the mitigation proposals accordingly. The Applicant is asked to complete such a review and clarify to the Councils and the ExA the outcome accordingly.	The Applicant notes the Councils' consideration of the approach to the landscape and ecological mitigation proposals. The methodological matters are discussed in response to other points above. The Applicant believes that the mitigation proposed is proportionate to mitigate the standalone and the cumulative effects that might arise as a result of the Mona Offshore Wind Project.
REP1-049.22	3.3.6 Management proposals The Outline Landscape and Ecological Management Plan (OLEMP) [APP-208] general principles and objectives as set out in outline, appear to be appropriate in terms of caring for the soft landscape and habitats mitigation and delivering the necessary levels of mitigation relied upon in the ES. The successful establishment and ongoing management of retained and proposed landscape and	Requirement 7, Schedule 2 of the draft development consent order (Document Reference C1 F04) (Draft DCO) requires a landscape plan in accordance with outline landscape and ecology management plan to be submitted to the relevant planning authority for approval. Requirement 7 is included in particular to discharge the details of landscaping around the onshore substation. In relation to details of landscaping for the rest of the onshore development, Requirement 12, Schedule 2 of the draft DCO requires landscape and ecology management plan for the relevant stage of the onshore works, in accordance with the outline landscape and

Reference	Written Submission Comment	Applicant's response
	habitat measures will be critical to deliver mitigation of landscape and visual effects. This highlights the importance of securing the appropriate management proposed. Elected Members highlight concerns regarding the visual impacts that will occur in the 15-year period whilst mitigation planting is established. Given the scale of the substation proposed, these effects could be substantial for the local community. Ensuring the planting is of a high quality and meets its intended purpose via successful management is therefore essential. The SLVIA rightly relies on establishment of the landscape proposals over a fifteen-year period in order to appropriately mitigate adverse effects. However, the OLEMP is not clear on the committed management period. In places it refers to five year's maintenance and monitoring for some elements. This is not considered to be adequate to guarantee successful delivery, establishment and ongoing care of the required mitigation. The Councils suggest that the OLEMP should be revised to add a very clear statement at the beginning of the document committing the Applicant to manage the landscape and habitat works for the operational life of the proposed development and outline a plan to manage the works for a minimum period of fifteen years. The management and monitoring should be carried out and adaptively updated as necessary on a five-yearly basis during the fifteen-year plan. In addition, the Councils suggest a DCO requirement is needed to commit the Applicant to provide a detailed Landscape and Ecological Management Plan and to deliver the proposed management regime throughout the operational life of the proposed development.	ecology management plan, to be submitted to the relevant planning authority for approval. No single stage of the onshore works can commence until that landscape and ecology management plan has been approved. In addition, Requirement 8 requires all landscaping approved under Requirement 7 is to be implemented in accordance with the approved plan. Further that for 5 years after planting, any tree or shrub which 'is removed, dies or becomes, in the opinion of the relevant planning authority, seriously damaged or diseased must be replaced'. A maintenance period of 5 years was considered appropriate in the Awel y Mor Offshore Wind Farm Order 2023 which is located in a very similar area to this Project. Also in a similar location is the North Wales Wind Farms Connection Order 2016 which has a 5 year maintenance period. Further recently granted Hornsea Four Offshore Wind Farm Order 2023 also includes a landscape maintenance period of five years. The Applicant notes that a 10 year maintenance period has been included in offshore wind farm orders which are located in the Norfolk region, for example the Norfolk Boreas Offshore Wind Farm Order 2021 and the Norfolk Vanguard Offshore Wind Farm Order 2020. It is understood through the Norfolk Vanguard Outline Landscape and Ecological Management Strategy (Clean) (Revision 3) (REP9-014 of EN010079) that the 10 years of aftercare in North Norfolk has been established to reflect the challenging growing conditions anticipated closer to the coast. As such, the Applicant does not consider it necessary or appropriate to increase the establishment period for which landscape planting beyond what has been accepted on a recently made development consent order in a very similar location. The Applicant is confident that this period will be sufficient to allow the planting to establish. The Applicant has, however, updated the Outline landscape and ecology management plan (APP-208) to provide for the possibility of additional monitoring and maintenance to be agreed with NRW if appropriate. The details of this will be submitted as part of the final Outline landscape and ecology management plan and will reflect the specific monitoring and maintenance requirements required for different habitats, and for protected species subject to NRW licensing which will be driven by the conditions specified in the NRW licence as issued.
REP1-049.23	3.3.7 Draft Requirements The Draft DCO Requirements have been reviewed and whilst they cover the necessary topics, the Councils	As stated in Row REP1-049.22, Requirement 7, Schedule 2 of the draft development consent order (Document Reference C1 F04) (Draft DCO) requires a landscape plan in accordance with Outline landscape and ecology management plan (Document Reference

Reference	Written Submission Comment	Applicant's response
	suggest that more detailed wording below is added to the Requirements in order to strengthen controls and avoid ambiguity. Additional drafting is also proposed to address concerns raised in previous sections of this LIR. ***Detailed landscape scheme*** No stage of the authorised development (as notified to the relevant planning authority in accordance with Requirement 4) may commence until, for that stage, must be commenced until final details of the landscape and habitats design have been submitted to and approved in writing by the local planning authority following consultation with NRW. The landscape and habitats design shall deliver the principles and content of the proposals set out in the Outline LEMP and Design Principles submitted with the application including planting to mitigate effects on residential visual amenity. The detailed landscape and habitats design shall include sufficient information to enable effective compliance monitoring or enforcement of the effectiveness of the mitigation measures. It will include: *I. Landscape and habitats design plans at an appropriate detailed scale. These will show hard and soft elements such as surfacing, planting and seeding* *II. A series of typical boundary cross sections showing the relationship between:* *a. the proposed substation (Work No.22) and other elements of the proposed development, such as fencing and CCTV,* *b. the proposed new and enhanced existing boundary features; and* *c. adjacent landscape features and visual receptors* *III. Plant specification to include:* *a. Native or appropriate other plant species, varieties and cultivars* *b. planting stock size, form, root condition etc; and*	J22 F02) to be submitted to the relevant planning authority for approval. Requirement 7 is included in particular to discharge the details of landscaping around the onshore substation. The Applicant has updated the drafting of this Requirement to clarify that Work No. 22a (which is the onshore substation) cannot commence until that landscape plan is submitted and approved. Further that the landscape plan must relate to Work Nos. 23, 24 and 31 to 37 which are all the relevant Work Nos. for landscaping and ecology mitigation as secured through the landscape and ecology management plan. Requirement 5, Schedule 2 of the Draft DCO requires details of the onshore substation (Work No. 22a) to be submitted to the relevant planning authority for approval. The drafting requires these details to be submitted prior to the construction of Work No. 22a in accordance with the Design Principles (APP-189). As set out in the Design Principles, landscape mitigation forms will be part of the consideration given to the details submitted in relation to Requirement 5. Landscaping and design details of the onshore substation will already be considered together by the undertaker, and the local planning authority through the submission of those details for approval under Requirements 5 and 7 and the drafting of these is therefore appropriate and fit for purpose. The Applicant will consider the specific points raised (in sections I., II., III., and IV. of the Councils'; proposed requirement) and whether further information needs to be included in the Outline landscape and ecology management plan (Document Reference J22 F02) and Design Principles (APP-189) to reflect those.

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	IV. detailed planting arrangements for the main proposed landscape and habitat features, such as woodland and hedgerows, showing: *a. densities, spacing and numbers;* *b. Depths of topsoil and subsoil; ground preparation and cultivation;* *c. Methods of weed control, plant protection and support; and* *d. Seed mix and or turf specifications and sowing rates.*	
REP1-049.24	***Landscape and Ecology Management Plan*** No stage of the authorised development (as notified to the relevant planning authority in accordance with Requirement 4) may commence until, for that stage, a detailed Landscape and Ecological Management Plan (LEMP) committing the Applicant to manage the landscape and habitats for the duration of the operational life of the proposed development has been submitted to and approved in writing by the LPA, following consultation with NRW. The LEMP shall provide a detailed plan for the first fifteen years setting out *i) All landscape and ecological objectives and management, protection, maintenance and monitoring prescriptions to deliver these objectives;* *ii) schedules and timescales for delivery of the LEMP; and,* *iii) Reporting and monitoring responsibilities and delivery mechanisms for all elements of the LEMP.* The LEMP shall be implemented and monitored in accordance with the approved details.	As stated in Row REP1-049.22, Requirement 8 requires all landscaping approved under Requirement 7 is to be implemented in accordance with the approved plan. Further that for 5 years after planting, any tree or shrub which '*is removed, dies or becomes, in the opinion of the relevant planning authority, seriously damaged or diseased must be replaced*' which follows the position in the Awel y Mor Offshore Wind Farm Order 2023. The Applicant has updated the Outline landscape and ecology management plan (Document Reference J22 F02) to provide for the possibility of additional monitoring and maintenance to be agreed with NRW if appropriate. The details of this will be submitted as part of the final Outline landscape and ecology management plan (pursuant to Requirements 7 and 12 – see Row REP1-049.22) and will reflect the specific monitoring and maintenance requirements required for different habitats, and for protected species subject to NRW licensing which will be driven by the conditions specified in the NRW licence as issued.
REP1-049.25	***Retention and protection of existing trees and hedgerows*** No stage of the authorised development (as notified to the relevant planning authority in accordance with Requirement 4) may commence until, for that stage, a Tree and Hedgerow Protection Strategy ("THPS") prepared in accordance with BS 5837:2012 (Trees in relation to design,	The draft development consent order (Document Reference C1 F04) (Draft DCO) contains in Requirement 9, Schedule 2 an obligation to submit a code of construction practice to the relevant planning authority prior to commencing a stage of the onshore works. This includes, as described in Requirement 9(2)(p) an arboriculture method statement and means a final arboriculture method statement will be prepared in accordance with the outline arboriculture method statement (Document Reference J26.18 F02). This includes details of various measures in relation to those trees which will not be removed as a result of the authorised project. The Applicant therefore considers that no

Reference	Written Submission Comment	Applicant's response
	demolition and construction) identifying the trees, groups of trees and hedgerows to be retained during that stage has been submitted to and approved by the planning authority. The THPS referred to in the sub-paragraph above must include: *I. Tree Protection Plans detailing the alignment of temporary physical tree protection* *II. measures, in accordance with the details identified in Section 8 of the Arboricultural* *III. Impact Assessment report (Document 5.21.1B);* *IV. a schedule of any proposed tree or hedgerow removal and pruning with annotated plans;* *V. a specification for temporary physical protection for trees and hedgerows; and* *VI. details of an auditable system of compliance with the approved protection measures.* The trees, groups of trees and hedgerows identified in the THPS referred to above must not be felled or otherwise removed in connection with the construction of the authorised development. The relevant stage of the authorised development must not commence until the approved protection measures referred to in sub-paragraph (1) are in place, and they must thereafter be maintained during the construction of the relevant stage of the authorised development.	additional requirement is needed in relation to existing trees and hedgerow protection as those details are already secured within the outline arboriculture method statement (Document Reference J26.18 F02). The Applicant will review the outline arboriculture method statement (Document Reference J26.18 F02) and consider whether any updates are required in light of the specific points raise (in sections I. to VI. of the Councils'; proposed requirement).
REP1-049.26	3.3.8 Summary Generally, the SLVIA is well structured, and the scope of the assessment and the extent and granularity of the baseline drawn is appropriate and proportionate to the proposed development. There are two important methodological issues identified, which bring into question the assessments as presented, with potential implications for reporting of significant effects and associated mitigation measures required. The first is around the erroneous use of split assessment categories and the second is around the	The Applicant notes the comments in CCBC and DCC's LIR and confirms that its response is provided as follows: • Split assessment categories – the Applicant has provided a response at REP1-049-11 • Thresholds for significance – the Applicant has provided a response at REP1-049.09 and 049.10 • Reporting of landscape, visual and cumulative effects – the Applicant has provided a response at REP1.049.19

Reference	Written Submission Comment	Applicant's response
	unusually high threshold for defining significant effects. These matters have been raised in previous consultation responses and should be discussed through examination. Any necessary steps to resolve these issues could have considerable implications on the outcomes of the assessment of landscape, visual and cumulative effects and their significance. The Councils are concerned that the methodological issues above and/or errors in the assessment have led to under reporting of landscape, visual and cumulative effects. As a result, there may be need for additional mitigation to address any further significant effects that may be identified through review of the assessment.	
REP1-049.27	Visual effects on the users Denbighshire Memorial Park and Crematorium have not been assessed but are considered to be initially major, adverse and significant easing to moderate, but still significant residual effects by year 15.	The Applicant refers to its response provided in REP1.049.17.
REP1-049.28	There is concern that the proposed development in combination with Awel y Môr onshore substation, the St. Asaph solar farm, the extension to National Grid's Bodelwyddan substation, and existing onshore wind developments will result in moderate and significant cumulative landscape and visual effects. The councils are of the opinion that in combination these projects, including proposed development would have the cumulative effect of altering the landscape and visual environment to the extent that energy infrastructure would become a prominent or defining aspect of the local landscape and views. There is currently no mitigation proposed to address cumulative effects and this should be addressed.	The Applicant refers to its response provided in REP1.049.18.

Reference	Written Submission Comment	Applicant's response
REP1-049.29	The scoping out of nighttime effects is acceptable if there is no proposed construction or operational lighting as stated at SLVIA Table 6.2. However, given the contradictory statements in other parts of the ES which do indicate lighting is proposed both in construction and operation, the lack of any nighttime visual and landscape effects assessment is not acceptable. If there is any lighting proposed, a proportionate assessment of lighting impacts is needed. Additionally, if any lighting, including emergency lighting, is needed, the DCO should include an requirement to strictly control the use of nighttime lighting. This is particularly important given the hours of working being requested by the Applicant which mean that some activities will be happening during hours of darkness at certain times of the year.	Please see the Applicant's response to REP1-049.20.
REP1-049.30	Mitigation measures seem appropriate for the levels of effect assessed, but are likely to need bolstering if the clarification or reassessment to address methodological issues results in more significant effects.	The Applicant considers that the methodology is appropriate and that the significance of effects remains unchanged. No further mitigation is proposed.
REP1-049.31	The following are to be secured via DCO Requirements. • A detailed landscape mitigation scheme; • a detailed LEMP; and • a detailed plan for the protection and retention of existing trees and hedgerows	Please see the Applicant's response above to REP1-049.23 to REP1-049.25.
REP1-049.32	3.4 Ecology and biodiversity 3.4.1 Information reviewed In undertaking this review the following documents are referenced and have been reviewed: • F1 ES Non-Technical Summary [APP-046/7] • F1.3: Project Description [APP-050] • F1.5: Environmental Impact Assessment Methodology [APP-052] • F3.3, Chapter 3: Onshore Ecology [APP-066] and	The Applicant notes the response.

Reference	Written Submission Comment	Applicant's response
	suite of supporting technical reports/appendices • F3.4: Onshore and intertidal ornithology [APP-067] and suite of supporting technical reports/appendices • B10 Mona Offshore statutory and non-statutory nature conservation sites [APP-015] • B11 Mona Onshore Statutory and Non-Statutory Nature Conservation Sites [APP-016] • B14 Mona Tree and Hedgerow Plan [APP-019] • J7 Biodiversity Benefit and Green Infrastructure Statement [APP-193] • J22 Mona Outline Landscape and Ecology Management Plan [APP-208] • Relevant statutory consultation responses and Relevant Representations The Habitat Regulation Assessment (HRA) Stage 1 Screening Report, Document E1.4 and HRA Integrity Matrices, Document E1.5 have not been reviewed as part of this LIR. The Council defers to NRW as the relevant statutory consultee and the SoS as the Competent Authority on this matter. The assessment relating to intertidal invertebrates has not been reviewed as part of this LIR. Data on those surveys and assessments were not found within the documents reviewed. It is assumed that surveys of the intertidal areas are reported within the Benthic and intertidal ecology Document F2.2 and associated Technical Reports, which have not formed part of this review as it was limited to onshore elements only.	
REP1-049.33	3.4.2 Assessment Methodology and Baseline The Councils generally support the approach and methodology used to inform the ecological baseline of the onshore elements of the proposal. DCC confirmed in their response to statutory consultation (S42 response) in June 2023 that the council was in 'general satisfied that the appropriate surveys and assessments have been undertaken'. CCBC did not raise specific concerns	The Applicant notes the response.

Reference	Written Submission Comment	Applicant's response
	relating to approach and methodology within in their S42 response letter dated 16th June 2023. NRW has also confirmed in their Relevant Representation [RR-011], that *'NRW has reviewed the application and, notwithstanding our key concerns and other issues raised herein, consider the submission, on balance, to be comprehensive and of a good quality'.* An Onshore Ecology Working Group (EWG) was set up with NRW, DCC, CCBC, Welsh Government, Royal Society for the Protection of Birds (RSPB), Woodland Trust, and the Amphibian and Reptile Conservation Trust (ARC), and the findings of the Preliminary Environmental Information Report (PEIR) were shared with the group in April 2023. Issues raised by the group were regarding refinement of the methodologies.	
REP1-049.34	In NRW's Relevant Representation [RR-011] they '*consider the survey and assessment to be satisfactory in respect of great crested newts (GCNs), bats, otters, dormice, water voles'*, but have raised as a Key Concern that *'no surveys have been provided to assess the use of the onshore corridor for breeding and/or foraging barn owls'.*	Responses provided to specific points below in response REP1-049.35.
REP1-049.35	Updated methodologies were issued to NRW via email (November 2023), as detailed in Table 3.7 Document F3.3 [APP-066], following refinements requested through the Section 42 process and further refinements made by the Applicant's ecologists using professional judgement where methodologies were adapted or expanded. Furthermore, it is noted that in RSPB's S42 response, that owing to the acknowledged limitation of ongoing ecological surveys including breeding bird surveys, they reserved comment until the information was submitted in the ES to inform the assessment. The Councils would like to understand	It has been confirmed by NRW in subsequent correspondence that the assessment conclusions, and proposed mitigation, are sufficient to address potential effects on barn owl (in the absence of specific breeding surveys for this species). To evidence this, the Applicant would like to direct the Councils towards two key documents, for which the relevant information relating to barn owl is summarised below. **NRW Written Representation (08 August 2024) (RR-011)** In respect of barn owl, the NRW Written Representation states that: *"292. In our Relevant Representation (3.4.1.1) we raised concerns with regards to Barn Owl. We note the Applicant's Response to our Relevant Representation in that respect and the detailing of the survey undertaken. It is also noted "On the basis that no barn owls were recorded during the surveys, an assessment for impacts on barn owl was not undertaken in Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-067) as it was not considered that there would be any impact on barn owls arising from construction*

Reference	Written Submission Comment	Applicant's response
	from NRW and RSPB whether the updated methodologies removed any of their previous concerns.	*and operation of the onshore elements on the Mona Offshore Wind Project." We also note the commitment to undertake pre-construction surveys where vegetation removal is proposed during the breeding bird season and if barn owl is recorded during the pre-construction surveys, mitigation measures from the Breeding Bird Plan will be implemented.* *293. Therefore, we agree with the conclusions in the ES Onshore and intertidal ornithology [APP-067] and the recommendations and proposed principles for mitigation as set out in the Bird Protection Plan of the Outline Landscape and Ecology Management Plan (LEMP) [APP-208]. We also note that the final LEMP (Requirement 12 of the DCO) will be approved by the LPA following consultation with NRW (A). We agree with this approach."* From this the Applicant understands that NRW agrees with the assessment of potential impacts on barn owl, and that if barn owl are found to present during pre-commencement surveys, then there are sufficient mitigations in place. **Barn Owl Technical Note (07 August 2024) (REP-1-038)** A question as to whether the lack of barn owl survey represented a limitation to the assessment was asked by the ExA at Issue Specific Hearing 2 on 18th July 2024, in response to which a Barn Owl Technical Note to address the concerns raised was submitted at Deadline 1.
REP1-049.36	Table 4.7 Document F3.4: Onshore and intertidal ornithology [APP-067], states that NRW confirmed that their ornithologist was *'happy with the added content… and has no further comments to make.',* after there were updates provided on the intertidal and nearshore coastal bird surveys. Confirmation was provided in an email from NRW to RPS dated 11 November 2021. Table 4.7 Document F3.4 [APP-067], goes on to confirm that the intertidal survey methodologies were agreed with NRW during Onshore Ecology EWG meetings. The broad approach to survey methodology was introduced to the EWG in EWG meeting 01 (June 2022). Further detail, including daytime and nocturnal survey detail, was introduced in EWG meeting 02 (December 2022). NRW confirm in their S42 response in June 2023, that the approach to survey and assessment appears appropriate for the onshore (terrestrial) ornithological	It has been confirmed by NRW in subsequent correspondence that it agrees with both the approach and assessment made from the survey data, and that therefore one years' worth of surveys was sufficient to characterise the onshore wintering and migratory bird assemblage. To evidence this, the Applicant would like to direct the Councils towards NRWs recent Written Representation (REP1-056), which states that: *"293. Therefore, we agree with the conclusions in the ES Onshore and intertidal ornithology [APP-067] and the recommendations and proposed principles for mitigation as set out in the Bird Protection Plan of the Outline Landscape and Ecology Management Plan (LEMP) [APP-208]. We also note that the final LEMP (Requirement 12 of the DCO) will be approved by the LPA following consultation with NRW (A). We agree with this approach."*

Reference	Written Submission Comment	Applicant's response
	components given the habitats within the Order Limits and the nature of the scheme. However, it is noted that no written, or other, response has been provided regarding the Technical Note produced by the Applicant and sent to EWG to provide evidence that one year of survey data for wintering and migratory birds was sufficient for the purposes of the assessment of Onshore and Intertidal Ornithology for the Mona Offshore Wind Project. Table 4.7 Document F3.4 [APP-067], notes that NRW were due to provide an official response to the technical note provided on 18th September 2023. The Councils would like to understand from NRW whether they consider one year of surveys to be sufficient, or as advised on 2nd September 2021 (via email) that at least two contemporary years of core wintering bird surveys are required to account for interannual variation in use by bird features of designated sites.	
REP1-049.37	Furthermore, the Councils note that the onshore wintering and migratory bird surveys involved one survey visit to the onshore ornithology study area conducted between November 2022 to December 2022 and a second between February 2023 to March 2023. This seems limited to inform likely bird presence and use of the site. The Applicant states that 'The survey methodology followed the so called "look-see" method, as taken from Bibby et al. (2000)', however this methodology would include monthly visits to the same area between October-March to record bird variations over the wintering and migratory bird season. The Councils would also like to seek the opinion of NRW in regard as to whether these surveys are sufficient to inform the assessment and separate HRA.	The habitats available within the Mona Onshore Development Area are unsuitable to support wintering and migratory birds that are qualifying features of nearby European sites, and therefore a full suite of surveys for wintering and migratory birds was scoped out. All potential onshore pathways for impacts on the qualifying ornithology features of the identified European sites were screened out as no Likely Significant Effects (LSE) within the Habitats Regulations Assessment (HRA). The breeding bird surveys aimed to characterise an assemblage of common and widespread birds of farmland and woodland which are mobile and often wide ranging during the non-breeding period. It is worth noting that the 'look-see' methodology does not contain advice on how often visits need to be made. "*The 'look-see' methodology (Bibby et al. 2000), is where the observer, familiar with the species involved, surveys the whole of a predefined area.*" (BTO, 2024).
REP1-049.38	The Councils consider that sufficient desk studies and ecological surveys were completed to inform the	The Applicant notes the response.

Reference	Written Submission Comment	Applicant's response
	baseline both for the cable corridor and the intertidal cable landfall. Surveys, above the ones confirmed to be satisfactory by NRW, that were completed included for habitats (phase 1 habitat surveys and National Vegetation Classification (NVC) surveys), hedgerows, Invasive Non-Native Species (INNS), badger, reptiles, fish and eel, and terrestrial and aquatic invertebrates (which are all reported in Document F3.3 [APP-066]), and birds (which are all reported in Document F3.4 [APP-067]). These were all generally conducted within guidance, undertaken at optimal times of year, under suitable weather conditions, and within suitable study areas to inform the baseline. Where these are specific limitations, these have been described, and it is agreed that they would not significantly impacted the integrity of the ecological baseline.	
REP1-049.39	The Councils do not consider there are any significant gaps in the ecological baseline and that the baseline is sufficient in order to make an informed assessment, apart from the concerns raised by NRW regarding the lack of information concerning barn owl and whether one year of wintering and migratory birds' surveys is sufficient to inform the assessment relating to designated sites. The Councils would like to understand from NRW whether these previous concerns remain. Important Ecological Feature (IEFs) were identified, in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guideline for Ecological Impact Assessment in the UK and Ireland (referred to as CIEEM EcIA Guidelines), along with statutory and non-statutory designated sites, Habitats of Principle Importance, other habitats and species. These were all described adequately.	The Applicant notes the response.
REP1-049.40	The onshore ecology impact assessment methodology is stated to have followed 2017 EIA Regulations and	The Applicant notes the response.

Reference	Written Submission Comment	Applicant's response
	EIA guidance, and although CIEEM EcIA guidance has been considered, the assessment follows EIA methodology rather than that specified in the CIEEM EcIA guidance. The terms used to define magnitude and sensitivity are based on and have been adapted from those used in the Design Manual for Roads and Bridges (DMRB) methodology (Highways England et al., 2020). This is acceptable by CIEEM as stated within their Guidance that *'Where an EIA is required, the Ecological Impact Assessment will be presented in a way that fits the overall style and structure of the Environmental (Impact) Statement. However, the content of Appendix 3 remains relevant. Where elements of this content lie outside the presentation of the main Ecological Impact Assessment (usually an ecological chapter of the EIA), cross-reference should be included.*' The contents of Appendix 3 have generally been followed The assessment also took account of the future baseline scenario as per The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and CIEEM EcIA Guidelines, and the Councils agree with the general descriptions of future baseline considering potential changes in management practices and climate change described within Document F3.3 [APP-066] and the processes likely to affect wintering and migratory bird population significantly described within Document F3.4 [APP-067].	
REP1-049.41	3.4.3 Potential Effects ***Effects on species*** The potential impacts of the maximum design scenario for the onshore ecology and the onshore and intertidal ornithology are identified in Table 3.21 Document F3.3 [APP-066] and Table 4.23 Document F3.4 [APP-067], respectively. The Councils generally agree with the potential impacts identified, noting, however, that direct mortality impacts to species	The Applicant notes the response.

Reference	Written Submission Comment	Applicant's response
	during construction and decommissioning was not identified as a separate impact, but these were covered within the descriptions of impacts for individual receptors, such as para. 3.9.2.17 of Document F3.3 [APP- 066]: '*The increase in construction traffic and associated movements in areas around setts within the Mona Onshore Development Area would mean there is a potential for a corresponding increase in road mortality for badgers using the site'.*	
REP1-049.42	NRW confirm in their Relevant Representation [RR-011] that *'We agree with the conclusions in the ES Onshore Ecology (ref F3.3) [APP-066] and the recommendations and proposed principles for mitigation in the Outline Landscape and Ecology Management Plan (LEMP) [APP-208].*' The Councils agree with NRW for the Onshore Ecology Document F3.3 [APP-066], but as identified in the Assessment Methodology and Baseline sections above, the Council will defer to NRW regarding the onshore ornithological conclusion and potential impacts, as relating to protected species and protected sites.	As stated above, NRW has confirmed in its Written Representation (REP1-056, paragraph 293) that it is satisfied with the conclusions in the onshore and intertidal ornithology chapter (APP-067).
REP1-049.43	***Habitat and hedgerows*** Permanent and temporary habitat loss will be avoided using trenchless techniques for protected sites (Llanddulas Limestone and Gwrych Castle Wood SSSI) and/or their qualifying features (Traeth Pensarn SSSI), ancient woodland, calcareous grassland, seven of the nine rivers and ordinary watercourses, and 57 hedgerows (c. 45% of hedgerows) across the scheme. Using trenchless techniques for these sensitive and some irreplaceable habitats is welcomed and should aid in reducing potential impacts to IEFs.	The Applicant notes the response.
REP1-049.44	NRW also note in their Relevant Representation [RR-011] that 'the design of the cable corridor is for an avoidance of impact to sensitive ecological receptors and when this is not possible there is a commitment to trenchless techniques under Traeth Pensarn Site of	The Applicant has provided further detail on trenchless crossing feasibility in response REP1-049.109.

Reference	Written Submission Comment	Applicant's response
	Special Scientific Interest (SSSI) and Llanddulas Limestone and Gwrych Castle Wood SSSI'. Despite this commitment however, the Council note the concerns raised within Section 3.8 of this LIR and would like to further understand the certainty of the trenchless approach to protect certain protected sites.	
REP1-049.45	The Councils generally agree with the IEFs identified and their relative value and sensitivity; the magnitude of the impact; and the significance of the effect provided in Section 3.9 Document F3.3 [APP-066] and within Section 4.9 Document F3.4 [APP-067]. Those where there are or have been key concerns are discussed below. DCC raise concerns in their S42 response regarding 'extensive sections of hedgerow and trees are proposed to be removed' due to the proposed open cut trenches are proposed to lay cables, and 'further assessment is needed to demonstrate why trenchless ducts cannot be utilised to lay cables under existing hedgerow and trees in order to minimise the loss of important and biodiverse trees and hedgerow'. The Applicant's response in Table 3.7 Document F3.3 [APP-066] states that: 'Although many of the of hedgerows will be crossed by trenchless techniques as identified in Volume 5, Annex 4.3: Onshore Crossing Schedule of the Environmental Statement, there is still the option for open cut trenching through 55% of the hedgerows. However, this will seek to avoid vegetation removal, where possible, and open cut trench through gaps in hedgerows. Where hedgerow removal is required, the extent of hedgerow to be removed that has lesser ecological value, as identified in the Hedgerow Technical Report (Volume 7, Annex 3.4 of the Environmental Statement) will be selected over sections of hedgerow with high ecological value, where possible. Hedgerow removal will be temporary in nature and hedgerow re-instatement will follow, as soon as practicable, following installation of the cables.'	The Applicant notes the response.

Reference	Written Submission Comment	Applicant's response
	Paragraph 3.9.2.42 Document F3.3 [APP-066] confirms that up to a total of 7km of hedgerow will be lost temporary during construction, including: • '5.4 km of hedgerow loss for the open trenching (73 hedgerows with a maximum width of 74 m including the haul road) • 400 m for the construction haul road at locations where trenchless techniques are used (57 hedgerows with a maximum width of 7 m) • 200 m for the Onshore Substation and associated Temporary Construction Compounds • 1 km to allow access and appropriate visibility splays.' Paragraph 3.9.2.43 Document F3.3 [APP-066] confirms 'Re-instatement of hedgerow habitats will take place as soon as practicable once the cables have been installed but the 7 m haul road is likely to remain in place for duration of construction to enable testing to take place' and 'lost hedgerows will be replanted using locally sourced native species, as detailed in the Outline LEMP (document reference: J.22)'. It is recognised that 'there would be a loss of habitat and connectivity during the construction phase and until any new planting had established. Therefore, it is considered that in the short/medium term there is a medium impact.' Paragraph 3.9.2.44 Document F3.3 [APP-066] and within the Outline LEMP (document reference:J.22; Figure 1.1 – 1.3) demonstrates 'there will hedgerow enhancement and creation at eleven strategic locations (approximately 4.2 km) along the Mona Onshore Cable Corridor which will provide improved landscape level connectivity as many of the hedgerows identified are not important hedgerows that are in moderate or poor condition and, when enhanced will provide better links to existing blocks of woodland.' The Councils welcome this commitment to enhancement and creation of hedgerows to mitigate impacts.	

Reference	Written Submission Comment	Applicant's response
	Over and above that stated above for temporary hedgerow loss, as defined in paragraph 3.9.2.45 Document F3.3 [APP-066] 'Approximately 550 m of hedgerow will be permanently lost as a result of the Onshore Substation and permanent access road. In addition to this, there will be a requirement to remove hedgerows at the identified construction access locations to ensure visibility requirements are met.' The Councils welcome the commitment to mitigate the permanent loss of 550 m of hedgerow with '2.5 km of proposed species-rich hedgerow creation and enhancement at the Onshore Substation that will restore former field boundaries and help to improve habitat connectivity, particularly to Ancient Woodland sites to the south, such as Bryn Cefn, north of the River Elwy.' The Councils are satisfied that potential impacts and significance of effect provided by the Applicant regarding hedgerows are appropriate, and that the impacts have been adequately identified and sufficient mitigation has been provided.	
REP1-049.46	***Great Crested Newt*** It was also noted in DCC's S42 response *'that the substation site would result in the direct loss of Great Crested Newt (GCN) habitat. Any loss of habitat must be fully compensated for, and the Council would defer to NRW with respect to impact on protected species.* NRW's S42 response noted that there would be loss of GCN terrestrial habitat and advise that there would also be a loss of connectivity predicted. NRW agree the impact is predicted to be low, provided that a number of mitigation and long-term habitat compensations are provided. The assessment of impacts of habitat loss for GCN is addressed in Section 3.9 Document F3.3 [APP-066]. An Illustrative Landscape and Ecology Strategy identifies the proposed areas of planting and GCN habitat creation. A GCN mitigation strategy has been prepared and forms part of the Outline LEMP [APP-208]. The Councils will	The Applicant notes the response.

Reference	Written Submission Comment	Applicant's response
	continue to defer to NRW with respect to impact on protected species.	
REP1-049.47	***Trees*** CCBC raised in their S42 response 16th June 2023 that *'The Council has no objection in principle to the development, but considers that further refinement is required of the working corridor and that further assessment is required of the effects of the proposal'.* Those relating to ecological matters were regarding the working corridor identified in the PEIR being very broad and that further refinement is required to identify constraints and assess the impacts of the proposal. In order to determine the impact on trees, the CCBC stated it would require full British Standard (BS) 5837 reports. Furthermore, tree/woodland management plans and detailed replanting or mitigation planting plans with sizes, species, locations etc. provided together with location plans were requested to be submitted as part of the application so the recovery of trees and woodland could be fully assessed. Consideration of the arboricultural impact assessment is provided in Section 3.8 of this LIR, whilst comments from an ecological perspective on the tree/woodland management plans and detailed replanting or mitigation planting plans are discussed in the next section.	The Applicant notes the response and has responded to the further points in responses REP1-049.100 to REP1-049.122.
REP1-049.48	***Animal health*** In the CCBC S42 response it was also noted that *'Members of the Planning Committee have raised concerns over the potential for heat radiation from the underground cables to affect human health and animal health. The developer is requested to address these matters in the ES'.* The Councils could not locate evidence of where this has been addressed for animal health within the ES, and as such would seek clarification from the Applicant as to where this has been considered.	In respect of human health, this topic was scoped out with the agreement of the Planning Inspectorate in its Scoping Opinion Response (APP-194) in June 2022 as set out in Table 4.7 of the Human Health Assessment (ES Volume 4, Chapter 4: Human Health Assessment) (APP-078). It is therefore reasonable to conclude that if this topic can be confidently scoped out in respect of human receptors, then there is no requirement to consider animal health.

Reference	Written Submission Comment	Applicant's response
REP1-049.49	***Cumulative effects*** The onshore ecology Cumulative Effects Assessment (CEA) methodology has followed the methodology set out in F1.5: Environmental Impact Assessment Methodology [APP-052]. As part of the assessment, all projects and plans considered alongside the Mona Offshore Wind Project have been allocated into 'tiers' reflecting their current stage within the planning and development process. The Councils consider the CEA presented in Onshore Ecology Document F3.3 [APP-066] and Onshore and intertidal ornithology Document F3.4 [APP-067] to be thorough and informed, and with mitigation considered, generally agree with an overall conclusion that there are no significant cumulative effects to any species from the Mona Offshore Wind Project alongside other projects/plans, however the Councils will defer to NRW regarding the protected sites and protected species. Potential transboundary impacts have been identified in relation to onshore and intertidal ornithology. Overall, it is concluded that there will be no significant transboundary effects arising from the Mona Offshore Wind Project. The Councils would like to seek further clarification from NRW as to whether they agree with the findings from the CEA regarding the onshore ecology and the onshore and intertidal ornithology, given they did have some concerns over the offshore elements and in-combination effects from the HRA Stage 2 ISAA for SPAs and Ramsars [APP-03], as detailed in their Relevant Representation [RR-011].	It has been confirmed by NRW through the Statement of Common Ground process that it agrees with the assessment of effects from the Mona Offshore Wind Project cumulatively with other projects with regard to onshore ecology, including onshore and intertidal ornithology. To evidence this, the Applicant would like to direct the Councils towards the Statement of Common Ground - Natural Resources Wales (Advisory) Onshore (REP1-026, paragraph NRW.OE.11), which states that: "*NRW (A) agrees there will be no significant effects on onshore ecology (including onshore ecology and intertidal ornithology) cumulatively with other projects and plans.*"
REP1-049.50	3.4.4 Mitigation / Management Proposals A number of measures (primary and tertiary) have been adopted as part of the Mona Offshore Wind Project to reduce the potential for impacts on onshore ecology. These are outlined in Table 3.22 in Onshore Ecology Document F3.3 [APP-066]. Where significant effects have been identified, further mitigation measures	The Applicant notes the response.

Reference	Written Submission Comment	Applicant's response
	(referred to as secondary mitigation in IEMA, 2016) have been identified to reduce the significance of effect to acceptable levels following the initial assessment. The Applicant also produced a Biodiversity Benefit and Green Infrastructure Statement Document J7 [APP-193] to demonstrate net biodiversity benefit has been achieved as part of the Mona Offshore Wind Project and an Outline LEMP [APP-208] to provide general principles and objectives for all mitigation, enhancement, monitoring and management of the landscape and ecology.	
REP1-049.51	The Councils agree that the step-wise approach in PPW12 has been demonstrated within the Document J7 [APP-193], and the Councils agree that with the mitigation and enhancements proposed for the onshore elements of the project will provide net benefits for biodiversity. However, this is only achieved when all mitigation and habitat enhancements are fully realised, as in habitats are mature and delivering benefits for which they have been assessed for, and only if these are managed sufficiently to ensure that these net benefits are delivered for the lifetime of the development. This is not fully recognised within the Onshore Ecology Document F3.3 [APP-066], the Biodiversity Benefit and Green Infrastructure Statement Document J7 [APP-193], or the Outline LEMP Document J22 [APP-208].	The time taken for habitat creation mitigation measures to become established has been taken into account when undertaken the ecological impact assessment. For example, paragraph 3.9.2.69 of Volume 3 Chapter 3: Onshore Ecology [APP-066], in respect of the assessment of the impacts of temporary and permanent habitat loss on bats during construction, states that: "*In the long-term, once the hedgerows have established, there will be a net gain of hedgerows along the Mona Onshore Cable Corridor and improved connectivity for commuting bats between woodland blocks within the landscape, particularly south of the Onshore Substation linking to ancient woodland*."
REP1-049.52	NRW Relevant Representation [RR-011] noted '*We also note that the final LEMP (Requirement 12 of the DCO) will be approved by the LPA following consultation with NRW. We agree with this approach. However, we consider that amendments to the Outline LEMP are required to ensure that the final LEMP is based on a more robust Outline LEMP (e.g. the need for an external Ecological Compliance Audit, revised details regarding long-term monitoring and management).'*	Please see Row REP1-049.22. A revised version of the Outline landscape and ecology management plan (Document Reference J22 F02) has been submitted at Deadline 2 to confirm that long-term management, maintenance and monitoring, and reporting of actions, will be undertaken as agreed with NRW.

Reference	Written Submission Comment	Applicant's response
	The Councils agree with the advice provided here by NRW and welcome NRWs consultation prior to the discharge of Requirement 12. Further to add to NRW's comments on the outline LEMP, the Councils would also like to raise key concerns over the length of time and appropriateness of the management and monitoring for all the proposed habitat creation, reinstatement and enhancement within the outline LEMP. Key targets should be identified for the habitats being created, reinstated and enhanced within the final LEMP to allow for auditing and any associated remedial actions. For this reason, the final LEMP should be time bound but also recognise the need for adaptability to achieve and maintain the net benefits for biodiversity which are to mitigate impacts of the scheme, and for the lifetime of the scheme.	
REP1-049.53	Within the outline LEMP Document J22 [APP-208], paragraph 1.8.3.2 the Applicant states that '*Monitoring and maintenance inspections will be completed annually for a minimum of five years following initial planting. This will ensure that the requisite planting densities and health are achieved.'* The Councils welcome this, however, also recognise that most habitats, particularly habitats such as woodland and species-rich grassland and wildflower meadows will take more than 5 years to establish and will require management and maintenance for their lifetime to ensure they maintain as desired habitats, i.e. do not suffer from scrub encroachment in both grassland and woodland, and dominance from grass species in grasslands.	Please see Row REP1-049.22. A revised version of the Outline landscape and ecology management plan (Document Reference J22 F02) has been submitted at Deadline 2 to confirm that long-term management, maintenance and monitoring, and reporting of actions, will be undertaken as agreed with NRW.
REP1-049.54	The outline LEMP Document J22 [APP-208] does outline measures for the long-term management of different habitat types, however these are not time bound or provide specific details regarding condition targets and adaptive management. The Councils will seek to work collaboratively with NRW and the Applicant in developing the final LEMP, so that it is	The Applicant welcomes the opportunities for collaboration with the Councils and NRW to develop this document. Requirements 7 and 12, Schedule 2 of the draft development consent order (Document Reference C1 F04) state that NRW will be a consultee in the discharge of the final landscape and ecology management plan.

Reference	Written Submission Comment	Applicant's response
	sufficient to achieve and maintain the mitigation and enhancements proposed for the lifetime of the development.	
REP1-049.55	The pre-construction surveys for species/species group as listed in Table 1.1 of the outline LEMP Document J22 [APP-208] is welcomed by the Councils, and it is advised that these are updated in the final LEMP relative to protected species licence requirements and any further discussion and development of these with NRW or the Councils. The Councils will defer to NRW with respect to pre-construction survey, potential impacts and mitigation for protected species in relation to licencing.	Data from the various pre-construction surveys will inform revisions the preparation of the final LEMP as necessary and will also inform relevant protected species licence applications to NRW.
REP1-049.56	The Councils welcome the Outline Bird Protection Plan in Appendix E of the outline LEMP [APP-208, however would like to seek the advice from NRW regarding the use of netting of vegetation outside of the breeding bird season, and whether this presents a risk to protected species and/or wintering or migratory birds that maybe utilising the vegetation.	The Applicant notes the response regarding the netting of vegetation outside the breeding bird season as a management option within the Outline landscape and ecology management plan (J22 F02).
REP1-049.57	The Councils would like to comment on, as well as NRW, the development of a detailed reptile mitigation strategy, as identified in paragraph 1.10.2.58 outline LEMP Document J22 [APP-208] *'A detailed reptile mitigation strategy will be prepared and agreed with NRW to ensure that no reptiles are significantly harmed by the works that will be set out in the final LEMP. The strategy will include a combination of displacement, vegetation control, capture and translocation of reptiles.'*	As stated above, the final LEMP will need to be approved by the Councils in consultation with NRW as per Requirements 7 (in respect of the onshore substation) and 12 (in respect of the rest of the onshore works), Schedule 2 of the draft development consent order (C1 F04), and therefore this will enable any amendments to be incorporated to satisfy any outstanding concerns in respect of the reptile mitigation strategy, although the approach proposed is in accordance with standard guidance. The Applicant welcomes the opportunities for collaboration with the Councils and NRW to develop this document.
REP1-049.58	Post construction monitoring for protected species as outlined in the outline LEMP Document J22 [APP-208] should be agreed through the licencing process, respective to scale of impact and mitigation proposed, and the Councils will defer to NRW with respect of	The Applicant notes this response and can confirm that post-construction monitoring for protected species subject to NRW licensing will be agreed with NRW as part of the licence process.

Reference	Written Submission Comment	Applicant's response
	licensing.	
REP1-049.59	In conclusion, the outline LEMP [APP-208] presents a suite of mitigation measures that will benefit both landscape and biodiversity. The outline LEMP does not include any measures which in the Councils view are not appropriate and appears sound as a basis for development of the final LEMP. However, the document lacks clarity in places and consideration should be given to appropriate after-care, management and monitoring which will ensure and secure the mitigations and net benefits for biodiversity are actually delivered and maintained for future generations. Further to this, the Councils question whether the wording of Requirement 12 is sufficient to ensure the mitigation and enhancements are delivered for the lifetime of the development as described in the ES to mitigate and compensate any adverse impacts, and that these are adaptive and can be audited.	Please see responses REP1-049.22 and REP1-049.62 to REP1-049.63.
REP1-049.60	The Councils also note that in NRW's Relevant Representation [RR-011] that they agree with the approach taken regarding the (terrestrial) Biosecurity Protocol in that it will be approved by the LPA (Requirement 9 under CoCP). However, they *'advise that NRW (A) is consulted prior to the discharge of Requirement 9*' and 'that minor amendments to the Outline Biosecurity Protocol (APP-223) is required to be made in order to ensure that the final version of the plan is based on a more robust outline version (e.g. the Plan should consider landscape planting, diseases that may affect protected species, and preventive techniques)' and *'that it should also refer to the provisions under the Invasive Alien Species (Enforcement and Permitting) Order 2019'.* The Councils welcome NRWs proposed consultation on	The Applicant has responded to NRW's relevant representation in PDA-008 (paragraph RR-011.124). The Applicant would like to direct the Councils towards the Natural Resources Wales written representation [REP1-056], which states that: "*Further to our comments (3.4.5 of our Relevant Representation) on Outline Biosecurity Protocol (APP-223) we note the Applicant's Responses to our Relevant Representations [PDA-008] and welcome these clarifications. We note that the (terrestrial) Biosecurity Protocol will be approved by the LPA (Requirement 9 under CoCP). We agree with this approach and consider that this will appropriately manage INNS*." The Applicant also notes that NRW are already a consultee for the discharge of the outline code of construction practice as set out in Requirement 9(1), Schedule 2 of the draft development consent order (C1 F04).

Reference	Written Submission Comment	Applicant's response
	documents to be approved under Requirements 9 and 12.	
REP1-049.61	3.4.5 Summary The Councils generally support the onshore ecology and onshore and intertidal ornithology approaches and methodologies, the assessment of effects, and the mitigation and enhancements proposed for the scheme. The key concern from the Councils is regarding long-term monitoring and management of mitigation and enhancements to be provided in the final LEMP, to ensure that deliver the net benefits for biodiversity they are design for, and that these are secured and maintained for the lifetime of the development. The Councils will seek to work with NRW and the Applicant regarding the development of the final LEMP relating to the discharge of Requirement 12, as well as the possible re-wording of Requirement 12. As detailed in this section, there remain some points of further information or clarification that are required to address the Councils concerns and/or previous concerns raised by NRW, RSPB and elected Council Members (as detailed in previous S42 response), including: • Breeding bird survey methodology, particular relating to barn owls. • Wintering and migratory bird survey methodology. • The potential for heat radiation from the underground cables to affect animal health. • The use of netting of vegetation outside of the breeding bird season.	Responses are provided above to address the Councils concerns and/ or previous concerns raised by NRW and RSPB. Please refer to responses REP1-049.22, REP1-049.35, REP1-049.37, REP1-049.48, REP1-049.56 and REP1-049.62 to REP1-049.63. .
REP1-049.62	Elected Members reiterate the need for clearly defined mitigation measures and expected outcomes within the DCO application, such that they can be monitored and managed effectively to ensure their success. Elected Members remain concerned that a lack of specific detail at this stage does not provide sufficient confidence that impacts to the local community and environment would be appropriately mitigated. It is considered that the	See Rows REP1-049.52 to REP1-049.54.

Reference	Written Submission Comment	Applicant's response
	successful delivery of biodiversity net benefit must also be achieved, particularly in the context of a project that is presented as part of the solution to tackling the climate emergency and to be of overall environmental benefit. The Councils would continue to defer to NRW with respect to impact (including cumulative impacts), assessment and mitigation associated with protected species and protected sites. The Councils welcome NRWs consultation relating to Requirements 9 and 12.	
REP1-049.63	3.5 Highways, traffic and transport 3.5.1 Information Reviewed This section of the review presents observations in respect of the highways, traffic and transport assessment and supporting documents. In undertaking this review the following documents are referenced and have been reviewed: • E3.1 Consultation Report Appendices - Part 3 (D.25 to F) [APP-040] • E4.3 Technical Engagement Plan Appendices - Part 3 (N to S) [APP-044] • F3.8: Traffic and Transport [APP-071] • F5.5.1: Cumulative effects screening matrix [APP-084] • F7.8.1: Description of network links and sensitivity [APP-171] • F7.8.2: Base traffic flows [APP-172] • F7.8.3: Personal injury accident locations [APP-173] • F7.8.4: Public Transport Network [APP-174] • F7.8.5: Construction vehicle trip generation assumptions [APP-175] • F7.8.6: Traffic flows with construction traffic [APP-176] • F7.8.7: Traffic and transport figures [APP-177] • J26.17 Outline Public Rights of Way Management Strategy [APP-229] • J26.13 Outline Construction Traffic Management Plan [APP-225] • J26.16 Outline Highways Access Management Plan [APP-228]	The Applicant notes the response.

Reference	Written Submission Comment	Applicant's response
	• B15 Street Works and Access to Works Plan [APP-020] • J1 Other Consents or Licences Required [APP-185] • Relevant statutory consultation responses and Relevant Representations	
REP1-049.64	3.5.2 Assessment Methodology and Baseline The Councils, Welsh Government and the North and Mid Wales Trunk Road Agent have raised several points through the pre-application consultation process. These points were evidently used to inform the scope of transport work undertaken by the Applicant. The assessment methodology has been based on best practice guidance and applies the two key rules outlined by the Environmental Assessment of Traffic and Movement (IEMA, 2023). It is in line with industry standards. A comprehensive policy review has been undertaken and appraisal of where the relevant policy has been considered and complied with is included. During the Scoping exercise both the operational and decommissioning effects have been scoped out of the assessment. This is considered appropriate for a development of this nature. Table 8.8 of the ES Chapter F3.8 [APP-071] provides appropriate justification for the scoped-out elements. However, the study area being set to 1km from the Onshore Mona Development Area does mean that a wider, more strategic assessment has not been undertaken. This is pertinent to the Cumulative Effects Assessment (CEA) which has been limited as a result. The impact on the local and specifically the Strategic Road Network could reach out significantly beyond 1km. Whist the extent of the traffic and transport study area was agreed, it is considered that the CEA should not be based on the same area. The Councils consider	The traffic and transport study area has been agreed with Conwy County Borough Council, Denbighshire County Council, Welsh Government and the North and Mid Wales Trunk Road Agent as set out in Section 8.4.4 of Volume 3, Chapter 8: Traffic and Transport (APP-071). It includes all access routes where construction traffic would not yet have dispersed across the highway network and thus encapsulates the parts of the highway network where potential impacts are most likely to occur. The study area was defined using the principle above: the points of the highway network where construction traffic has dispersed was the key consideration in setting the 1 km distance from the Mona Onshore Development Area. Indeed, traffic disperses at the A55 as it is the Strategic Road Network and the Applicant cannot define the route of construction traffic from that point; notwithstanding, the A55 is included within the traffic and transport study area. In terms of the local road network, all access routes that construction traffic would utilise along it are included as part of the traffic and transport study area. The A55 is the only nearby road that forms part of the Strategic Road Network. The traffic and transport study area includes the A55 corridor between Llanddulas and St Asaph as these are the points at which construction traffic would join / leave the Strategic Road Network and thus allow for an assessment of the Strategic Road Network where potential impacts and potential cumulative impacts are most likely to occur. Table 8.38 of Volume 3, Chapter 8: Traffic and Transport (APP-071) includes emerging development proposals that would generate material volumes of traffic along the local road network or along the A55 corridor within the traffic and transport study area during the construction of the Mona Offshore Wind Project. The location of those emerging developments included within the Cumulative Effects Assessment was not limited to those within the traffic and transport study area. All sites on the cumulative development long list (APP-084) were filtered to identify those that could generate material volumes of traffic into the traffic and transport study area during the construction of the Mona Offshore Wind Project and thus create potential cumulative impacts. As a consequence, relevant sites that are located outside of the traffic and transport study area (located more than 1km from the Mona Onshore Development Area) were identified and included within the assessments.

Reference	Written Submission Comment	Applicant's response
	this matter would benefit from further justification by the Applicant.	For locations farther away along the A55 (further outside of the traffic and transport study area and far more than 1km from the Mona Onshore Development Area where there are one or more junctions along the A55 in between the developments), the construction traffic generated by the Mona Offshore Wind Project would further disperse and become lower than those within the traffic and transport study area. On a similar basis, for those locations further away along the A55, the traffic generated by other cumulative developments would not be as dispersed and be higher than those within the traffic and transport study area. The contribution of the Mona Offshore Wind Project to the cumulative impacts reduce outside of the traffic and transport study area t and the contribution of other cumulative developments increases. Thus, the Cumulative Effects Assessment within the traffic and transport study area allows for a proportionate Cumulative Effects Assessment of the Mona Offshore Wind Project. On the same basis as the assessments contained within Volume 3, Chapter 8: Traffic and Transport (APP-071), the selection of sites for Cumulative Effects Assessment are not limited to those that are located within a traffic and transport study area. Their selection is based upon those that would generate material volumes of traffic into a traffic and transport study. Therefore, there is no requirement to expand a traffic and transport study area to undertake Cumulative Effects Assessment and a proportionate assessment is undertaken for each project by considering the traffic generation of a development rather than its location. The assessments contained within Volume 3, Chapter 8: Traffic and Transport (APP-071) were undertaken on this basis and there is therefore no requirement to expand the traffic and transport study area to undertake the Cumulative Effects Assessment.
REP1-049.65	In addition, the basis of the rationale used to justify sites inclusion/exclusion from the CEA from a traffic and transport perspective is vague. The Councils have concerns that the Applicant's approach appears to be based on not including sites where information is not readily available. The Councils suggest a more robust approach would be to include sites and make appropriate assumptions around trip generation. The Councils consider this matter would benefit from further justification by the Applicant. This is	The selection of emerging developments included within the Cumulative Effects Assessment has been undertaken to identify those that could generate material volumes of traffic into the traffic and transport study area during the construction of the Mona Offshore Wind Project and thus create potential cumulative impacts. The cumulative development long list (APP-084) was filtered and the Cumulative Effects Assessment was undertaken in accordance with the Planning Inspectorates Nationally Significant Infrastructure Projects Advice Note Seventeen: cumulative effects assessment relevant to nationally significant infrastructure projects. Sites were identified as being tier 1, tier 2 or tier 3 in accordance with that advice note and details on each of the sites were reviewed. The selection of sites to include within the Cumulative Effects Assessment was not based upon the level of information that was available for each site. The selection of

Reference	Written Submission Comment	Applicant's response
	reflective of general concerns raised around the CEA in Section 3.10.	sites was based upon those that would generate a material volume of traffic into the traffic and transport study area during the construction period of the Mona Offshore Wind Project. Where limited or no information was available on any sites, judgement was applied based upon land use and development quantum to consider whether any such sites could generate material volumes of traffic into the traffic and transport study area during the construction of the Mona Offshore Wind Project. The Cumulative Effects Assessment does not therefore exclude sites for which there is limited or no information available. The Cumulative Effects Assessment is undertaken in accordance with the Planning Inspectorates Advice Note 17 to include relevant sites that would generate a material volume of traffic into the traffic and transport study area during the construction period of the Mona Offshore Wind Project.
REP1-049.66	The Applicant has provided a suitable baseline on which to base assessment. The method for determining the Future Baseline Scenario is valid and is deemed to be appropriate with suitable filtering and cross check of committed development and the TEMPro software program. The committed developments included within the assessment generally appear appropriate. However, two sites that had been previously requested to be included are omitted as follows: • 46/2021/0159 PF - Glascoed Road, St Asaph Business Park • 40/2021/0825 PF - Residential Development Denbighshire Whilst not considered explicitly in the ES Chapter F3.8 [APP-071], after review of the Applicant's Transport Assessment it is assumed by the Councils that this is due to minimal highway impact. The reasoning behind the omissions should however be provided by the Applicant for completeness.	The development site at Glascoed Road St Asaph Business Park (46/2021/0159 PF) is consented, considered as a committed development and forms part of the future year baseline scenario. Its predicted traffic generation, as taken from its planning application, was added in as part of the future year baseline traffic flows. Upon reviewing Table 8.14: Committed developments of Volume 3, Chapter 8: Traffic and Transport (APP-071), the Applicant notes there is a typographical error whereby the row for application reference 46/2019/0806 (Development of 0.75 ha of land for residential purposes) should in fact read 46/2021/0159 PF (Glascoed Road, St Asaph Business Park). The Applicant has included an erratum to confirm this. Notwithstanding, the traffic generation from 46/2021/0159 PF (Glascoed Road, St Asaph Business Park) has been added in as part of the future year baseline traffic flows. The residential development Denbighshire (40/2021/0825 PF) is consented, considered as a committed development and forms part of the future year baseline scenario. It was part occupied at the time of undertaking traffic surveys and so its traffic generation is already included within those. The traffic generation from any residual homes that were not yet occupied at the time of the traffic surveys are covered by way of traffic growth rates (which include for new development) within the future year baseline traffic flows. Thus, the future year baseline traffic flows include for both 46/2021/0159 PF (Glascoed Road, St Asaph Business Park) and the residential development Denbighshire (40/2021/0825 PF).
REP1-049.67	3.5.3 Potential Effects The potential effects focus correctly on the construction phase and the effect of additional vehicle movements or related works required to facilitate construction of the	Please refer to the applicant's response to 3.5.2 which provides a response to the Cumulative Effects Assessment.

Reference	Written Submission Comment	Applicant's response
	project. ES Chapter F3.8 [APP-071] identifies and assesses the following impacts: • The impact upon driver (including public transport) and pedestrian/non-motorised user delay and fear and intimidation (non-motorised user amenity) for users of the LRN and SRN. • The impact upon severance for users of the LRN and SRN. • The impact upon road safety for users of the LRN, SRN and other transport receptors. • The impact of AILs on the safety of and delay to users of the LRN, SRN and other transport receptors. The Councils consider that the impacts identified are appropriate and cover the key areas for assessment. The Councils and their Elected Members retain concerns over the cumulative impact associated with the larger developments planned for the area and the combined impact that they together with the proposed development will have on the local and Strategic Network. This is of particular relevance given concerns over the methodology used for the study area and the CEA as raised in the preceding section of this LIR.	
REP1-049.68	3.5.4 Mitigation / Management Proposals The design measures adopted by the project to mitigate impact and effect are outlined within Table 8.22 of the ES Chapter. ***Public Rights of Way (PROW) closure type and reinstatement mechanism and programme*** Measures outlined within the Outline Public Rights of Way Management Strategy [APP-229] provide an appropriate level of detail in relation to the identification of the impacted routes and the proposed management and/or temporary diversions. Acknowledging that a detailed PRoW Management Strategy will be provided	Requirement 9 of the Draft DCO includes the provision of the public rights of way management strategy as part of the Code of Construction Practice and states that "no stage of the onshore works can commence until for that stage a code of construction practice has been submitted by the relevant planning authority following consultation with NRW and the relevant highways authority as appropriate". The outline public rights of way management strategy (APP-229) also states that at paragraph 1.2.1.5 that "the detailed PRoW Management Strategy would be developed in accordance with the Outline PRoW Management Strategy and subject to the approval by the relevant local planning authorities, including National Resources Wales and PRoW Officers from Conwy County Borough Council and Denbighshire County Council. The role of the local planning authorities in the development and implementation of the PRoW strategy is therefore secured through requirement 9 and the outline public rights of

Reference	Written Submission Comment	Applicant's response
	post consent, it would be beneficial to agree at this stage the process and mechanisms through which temporary works, management and reinstatement of PRoW will be achieved, and the role of the Councils.	way management strategy that has been submitted (APP-229) for which the implementation will be agreed post-consent with the local planning authorities as part of the discharge process.
REP1-049.69	***Construction Traffic Management*** The Outline Construction Traffic Management Plan provides a suitable level of detail of appropriate mitigation and is broadly accepted. However, the Councils do have concerns regarding working hours which are relevant to potential impacts and management of construction traffic, and are outlined in more detail in Section 4 of this LIR.	Please see the applicant's response to Section 4 (REP1-049.153) which provides a response to the proposed working hours.
REP1-049.70	***Road Safety*** The Outline Highways Access Management Plan introduces both potential highway speed limit changes and multiple traffic management and junction mitigation schemes. These items are to be sufficiently secured through Requirement 9 of the DCO and include for the Road Safety Assessment process and ultimate approval of any scheme from the Councils as highways authority, as named DCO consultee. It is noted in J1 Other Consents or Licences Required [APP-185] that the Applicant is seeking to disapply the Road Traffic Regulation Act 1984 through the DCO. The Councils seek justification and further discussion on this matter and reserve their position on the disapplication proposed until the approach is clarified.	The Applicant has reviewed the Outline Highways Access Management Plan and the Other Consents and Licences Required in light of the comments raised and intends to update these documents at Deadline 3 to clarify the process for approvals for both street works and the creation of site accesses. The Applicant is not seeking to disapply the Road Traffic Regulation Act 1984 and intends to meet with the local highway authority to discuss the approach to traffic regulation orders, as well as explaining the approvals process for street works and the creation of site accesses.
REP1-049.71	3.5.5 Summary Generally, the assessments are well structured. The scope of the assessments and the extent and granularity of the baseline drawn is appropriate and proportionate to the proposed development. There are some items of clarification that remain as summarised below: • Provision of further reasoning on the CEA approach adopted for assessment of Traffic and Transport; • Outline details of the PRoW temporary works and	The Applicant notes the response.

Reference	Written Submission Comment	Applicant's response
	reinstatement mechanism; • Further discussion and agreement on the construction delivery hours and application of processes outlined within the Road Traffic Regulation act 1984 through the DCO. Specifically, the defined route for obtaining approval for any speed limit alteration and the Road Safety Audit process.	
REP1-049.72	3.6 Water environment 3.6.1 Information reviewed In undertaking this review the following documents are referenced and have been reviewed: • F3.1: Geology, Hydrogeology and Ground Conditions [APP-064] The focus of the review was on the hydrogeological elements of this chapter. • F7.1.1: Aquifers, groundwater abstractions and ground conditions [APP-115] • F7.1.2: Hydrogeological risk assessment for groundwater supply sources [APP-116] • F3.2: Hydrology and flood risk [APP-065] • F7.2.1: Flood consequences assessment [APP-117] • F7.2.2: Surface watercourses and NRW flood zones [APP-118] • F7.2.3: Surface water abstraction licences, discharge consents and pollution incidents [APP-119] • F7.2.4: Water Framework Directive surface water and groundwater assessment [APP-120] • J1 Other Consents or Licences Required [APP-185] • Relevant statutory consultation responses and Relevant Representations This section presents observations in respect of the assessment of effects upon the water environment. Both ES Chapters, F3.1 Geology, Hydrogeology and Ground Conditions [APP-064] and F3.2 Hydrology and Flood Risk [APP-065], contain information pertinent to this review. The subsequent sections of the review are split into sections that cover each of these chapters separately.	The Applicant notes the response.

Reference	Written Submission Comment	Applicant's response
REP1-049.73	3.6.2 Assessment Methodology and Baseline ***F3.1: Geology, Hydrogeology and Ground Conditions*** The methodology set out for hydrogeology is in line with industry standards. The baseline provides sufficient information to inform the assessment. It is noted that two private water supplies (PWS 06 and PWS 07) have been identified but not located. The assessment appendix subsequently takes an appropriately conservative approach to assessment for these supplies (assumes high risk of impact) and includes mitigation (consultation and survey) to address at a future date.	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. Appropriate mitigation measures will be developed for private groundwater supply sources based on the hierarchy set out in paragraphs 1.10.4.9 of the Outline Code of Construction Practice (Document Reference J26 F02) which is secured by Requirement 9 of the draft Development Consent Order (Document Reference C1 F04).
REP1-049.74	***F3.2: Hydrology and flood risk*** The methodology set out is in line with industry standards. As noted in the relevant representation from NRW [RR-011], there is no baseline information presented on the fluvial geomorphology of the Ordinary Watercourses that may be affected by the construction or operation of the scheme. Evidence to support statements such as in paragraph 2.7.2.3 "*For crossings of smaller watercourses (that are frequently dry) and drainage channels, open cut trenched techniques may be used*" is important to ensure that the assessment has adequately considered potential effects relating to the watercourse crossings. The Councils request further baseline data provided in relation to fluvial geomorphology.	The Applicant acknowledges that fluvial geomorphological survey data has yet to be presented for ordinary watercourses within the study area. The Applicant intends to collate a baseline of existing geomorphological information to be presented with a photographic record for the benefit of the Local Authorities and NRW. This will be provided to the Examination.
REP1-049.75	3.6.3 Potential Effects ***F3.1: Geology, Hydrogeology and Ground Conditions*** The assessment of significant effects within Chapter 1 [APP-064] adequately considers the range of potential effects to hydrogeology and private water supplies.	The Applicant notes the response.
REP1-049.76	***F3.2: Hydrology and flood risk*** The Councils consider the assessment of significant	The Applicant acknowledges that additional mitigation may be required to mitigate temporary changes in runoff during construction along the haul road route. Additional

Reference	Written Submission Comment	Applicant's response
	effects within F3.2 Hydrology and Flood Risk [APP-065] does not adequately consider the range of potential effects to surface waters. As noted in the relevant representation from NRW [RR-011], the assessment does not consider effects to fluvial geomorphology of the Ordinary Watercourses crossed by the route or impacted by temporary activities such as the haul roads. Paragraph 2.7.2.2 notes the "*use of permeable gravel overlying a permeable geotextile membrane".* This also references Table 2.20 which describes the gravel for the haul road as *semi-permeable*. It is unlikely that a compacted gravel track would be as permeable as the previous land use (mainly permanent pasture) along the haul road route. This would result in there being more runoff generated during storm events and potential for changes in flood risk downstream. The Councils consider there to be a need for additional mitigation to mitigate temporary changes in runoff during construction. This would likely take the form of temporary attenuation features such as roadside swales and/or basins. This is unlikely to alter the outcome of the assessment but needs to be fully considered as part of the commitments in Table 2.20 during detailed design.	detail of construction phase drainage is presented within the Outline Code of Construction Practice Section 1.10.4.3 (Document Reference J26 F02) which details measures to control the increased flood risk from surface water runoff by the installation of suitable pre-construction drainage to ensure land drainage flow is maintained. The draft development consent order (Document Reference C1 F04) (Draft DCO) contains in Requirement 9, Schedule 2 an obligation to submit a code of construction practice to the relevant planning authority for approval prior to commencing a stage of the onshore works. This includes, as described in Requirement 9(2)(h) an Outline construction surface water drainage plan and means a final construction surface water drainage plan will be prepared in accordance with the outline Construction Surface Water and Drainage Management Plan (Document Reference J26.6 F02). This outlines the installation of surface water drainage measures in further detail, including the installation of drainage either side of Mona Onshore Cable Corridor and installation of interceptor drains where the hail road crosses watercourses or public highways. Further consideration to the drainage of haul roads will be made at detailed design. The Applicant intends to collate a baseline of existing geomorphological information to be presented with a photographic record of the watercourses that will be crossed by haul roads and where the installation by trenching is still an option. The design and construction of the haul road will be confirmed during detailed design. The management of surface runoff will be managed within the Order limits in line with the Outline Construction Surface Water and Drainage Management Plan (Document Reference J26.6 F02).
REP1-049.77	Section 2.7.3 considers the *"impact of increased flood risk arising from the diversion of the ordinary watercourse at the Onshore Substation".* The accompanying text for this section appears to consider the impact to the fluvial geomorphology (the form and function) of the watercourse rather than flood risk.	The Applicant notes the watercourse to be permanently diverted to accommodate the Onshore Substation Platform has a very small hydrological catchment and as a result in ephemeral in nature, only conveying flows as a response to high rainfall events. Flood risk is described in Volume 7, Annex 2.1 Flood Consequences Assessment (APP-117) section 3 'Onshore substation Platform Flood Consequences Assessment'. Flood risk will be adequately managed by ensuring the diversion is sized appropriately. The Applicant has also accounted for a buffer or easement to be provided between the banks of the diverted watercourse and the proposed Onshore Substation platform. For more information see the Outline Operation Drainage Management Strategy (APP-231) which must be submitted to the relevant planning authority for approval under Requirement 18 of the draft development consent order (Document Reference C1 F04).

Reference	Written Submission Comment	Applicant's response
REP1-049.78	Section 2.7.6 only considers the risk of pollution to watercourses during the construction of watercourse crossings. The wider risk of sediment runoff and spillages as result of construction activities such as construction compounds, the haul roads and their associated crossings are not considered. The Councils encourage the use of sustainable drainage techniques as part of a holistic construction water management plan. The Councils agree with the Relevant Representation made by NRW [RR-011].	The Applicant acknowledges that watercourse crossings were used as the 'maximum design scenario' within 'Volume 3, Chapter 2: Hydrology and flood risk' for assessing impacts arising from construction activities. As such, construction runoff has been assessed within the risk of pollution to watercourses. Runoff from will be managed in accordance with the measures set out in the Outline Surface Water and Drainage Management Plan (Document Reference J26.6 F02).
REP1-049.79	3.6.4 Mitigation / Management Proposals ***F3.1: Geology, Hydrogeology and Ground Conditions*** The Councils note that mitigation is proposed to address potential impacts to private water supplies. This is secured via the Outline Code of Construction Practice [APP-212] to be developed further post-consent and prior to commencement of works.	The Applicant notes the response.
REP1-049.80	***F3.2: Hydrology and flood risk*** Paragraph 2.7.2.5 of Chapter 2 Hydrology and Flood Risk states that *"The Outline Construction Method Statement (Document reference J26.15) includes outline methods for the proposed crossings. The crossings will be constructed broadly in line with the method statement: the methodologies will be developed further (in discussion with NRW) during the detailed design stage."* The Councils note that as the watercourses being crossed are Ordinary Watercourses then the Councils as lead local flood authority or LLFAs should be consulted, alongside NRW, in the development of the construction methodologies during detailed design. The Councils note the commitments in Table 2.20 and welcome consultation as the LLFA during detailed design and construction.	The Applicant acknowledges that paragraph 2.7.2.5. does not account for consultation with the Lead Local Flood Authorities. The draft development consent order (Document Reference C1 F04) (Draft DCO) contains in Requirement 9, Schedule 2 an obligation to submit a Code of Construction Practice to the relevant planning authority for approval prior to commencing a stage of the onshore works. This includes, as described in Requirement 9(2)(q) an Outline Onshore Construction Method Statement and means a final Onshore Construction Method Statement will be prepared in accordance with the Outline Onshore Construction Method Statement (Document Reference J26.15 F02). The detailed Construction Method Statement will be submitted to the Local Planning Authority for discharge prior to the commencement of construction. The LLFA in this case is the same as the Local Planning Authority so can be consulted in the discharge of Requirement 9.

Reference	Written Submission Comment	Applicant's response
REP1-049.81	It is noted in J1 Other Consents or Licences Required [APP-185] that the Applicant is seeking to disapply the Land Drainage Act 1991 through the DCO, in obtaining Ordinary Watercourse Consent. Document J1 identifies that discussions are required with the Councils on this matter. The Councils reserve their position regarding this proposal until these discussions have taken place.	The Applicant acknowledges the Councils' position regarding this proposal until additional discussions regarding the disapplication of the Land Drainage Act have taken place. The applicant is currently in liaison with the Councils' to agree Statements of Common Ground (SoCGs) for which it is intended will be submitted to the Examination at Deadline 3. The SOCGs will seek to reach agreement on these matters.
REP1-049.82	3.6.5 Summary Generally, the assessments are well structured. The scope of the assessments and the extent and granularity of the baseline drawn is appropriate and proportionate to the proposed development. The Councils note the potential effects to private water supplies. This is secured via the Outline Code of Construction Practice [APP-212] to be developed further post-consent and prior to commencement of works.	The Applicant notes the response.
REP1-049.83	Whilst the assessment methodology appears to be robust, the assessment of effects does not adequately consider the range of potential effects to surface waters. The principal omissions are an assessment of effects to the fluvial geomorphology of the watercourses impacted by construction or operation and water management during construction.	The Applicant acknowledges that fluvial geomorphological survey data has yet to be presented for ordinary watercourses within the study area. The applicant intends to collate a baseline of existing geomorphological information to be presented with a photographic record for the benefit of the Local Authorities and NRW. This will be provided to the Examination. The applicant acknowledges that additional mitigation may be required to mitigate temporary changes in runoff during construction along the haul road route. Additional detail of construction phase drainage is presented within the Outline Code of Construction Practice (APP-212) Section 1.10.4.3 which details measures to control the increased flood risk from surface water runoff by the installation of suitable pre-construction drainage to ensure land drainage flow is maintained. The Outline Construction Surface Water Drainage Plan (APP-227) discusses outlines the installation of surface water drainage measures in further detail, including the installation of drainage either side of Mona Onshore Cable Corridor and installation of interceptor drains where the hail road crosses watercourses or public highways. Further consideration to the drainage of haul roads will be made at detailed design.

Reference	Written Submission Comment	Applicant's response
REP1-049.84	The omission of any baseline information on the fluvial geomorphology (the form and function of) the ordinary watercourses in the study area should also be addressed. The Councils are concerned that the omissions from the assessment mean that the water environment effects are not fully reported.	The Applicant acknowledges that fluvial geomorphological survey data has yet to be presented for ordinary watercourses within the study area. The applicant intends to collate a baseline of existing geomorphological information to be presented with a photographic record for the benefit of the Local Authorities and NRW. This will be provided to the Examination. The two watercourses that have the potential to be crossed using trenched construction methodologies have been assessed as low sensitivity, heavily modified and incapable of supporting fish or macroinvertebrates based on the information provided in Volume 7, Annex 3.6: Aquatic invertebrate survey technical report (APP-126) and Volume 7, Annex 3.15: Fish and eel survey technical report (APP-138) of the Environmental Statement). Therefore, notwithstanding the applicant's commitment to providing the collation of existing geomorphological information, the applicant is confident that the assessment of effects undertaken within Volume 3, Chapter 2: Hydrology and flood risk (APP-065) and Volume 7, Annex 2.4: Water Framework Directive surface water and groundwater assessment (APP-120) will remain unchanged as a result of the collation of existing geomorphological information given the low sensitivity of the ordinary watercourses traversed by the onshore elements of the Mona Offshore Wind Project.
REP1-049.85	The following are to be secured via DCO Requirements and the Councils agree with these Requirements. • mitigation to prevent impacts to private water supplies; • a detailed plan for the management of water during construction; and • a detailed plan for the protection and retention of watercourses crossed by the scheme.	The Applicant notes the response.
REP1-049.86	3.7 Noise and vibration 3.7.1 Assessment Methodology and Baseline This section considers ES Chapter F3.9: Noise and Vibration [APP-072] and the associated annexes and figures. Overall, the noise and vibration assessment reported is appropriate and has applied methods in line with current guidance and best practice. Section 9.2 provides a summary of relevant legislation and policy, but no reference is made to Noise and Soundscape Plan for Wales 2023-2028, although the Environment (Air Quality and Soundscapes) (Wales) Act only came into force in April 2024, which is after the DCO	The Applicant acknowledges that the Environment (Air Quality and Soundscapes) (Wales) Act which came into force in April 2024 and the Noise and Soundscape Plan for Wales 2023-2028 which forms the national strategy as required by Part 2 of the Act. As the application was submitted and accepted prior to the Act coming into force, no reference was made to it within ES Volume 3 Chapter 9 (APP-072). Noise and Soundscape Plan for Wales 2023-2028 outlines the national strategy on assessing development in the context of the sound environment as perceived or experienced by people. Section 1.1 of the guidance outlines the 'ways of working' when undertaking activities that may affect soundscapes in Wales. These primarily relate to the need for long-term sustainable noise control solutions and the need to work actively with the public and relevant stakeholders when determining appropriate solutions. The Applicant will continue to liaise closely with the Local Authorities to ensure significant

Reference	Written Submission Comment	Applicant's response
	application was submitted and accepted. The Act requires local authorities in Wales to consider the policies in the soundscape plan. The Councils consider the following matters require further consideration by the Applicant:	adverse noise effects are minimised at nearby receptors through the Outline Construction Noise and Vibration Management plan (J26.3 F02) and adherence to Requirement 17 of the DCO (C1 F04). Annex E of the Noise and Soundscape Plan for 2023-2028 refers to best practice guidance that is compatible with the requirements of Welsh Government and local government policy. Section 9.4.1 of Volume 3, Chapter 9 of the ES (APP-072) outlines all relevant guidance adopted for the assessment of noise and vibration impacts. The guidance adopted for all of the noise and vibration assessments for all phases of the Mona Offshore Wind Project aligns with those outlined in Annex E of the Noise and Soundscape Plan for 2023-2028 and thus the Applicant considers the assessment to be compatible with the requirements of Welsh Government and local government policy.
REP1-049.87	***Construction noise*** The construction noise assessment follows the relevant British Standard (BS5228:201945) and makes assumptions about plant and working methods. Further consideration and detail of plant and working methods will be required if the proposals go ahead to ensure that agreed noise limits are achieved. This is normal practice at the application stage of projects and the Councils acknowledge their role as consultee on the noise and vibration management plan under requirement 9 of the DCO. Assessment has been based on existing ambient sound levels using an established approach to defining criteria as lowest observed adverse effect levels (LOAEL) and significant observed adverse effect levels (SOAEL). Table 9.18 of the F3.9 [APP-072] sets out the criteria applicable at each receptor. For Gwrych House, Sirior Bach and Dinorben Farm, the SOAEL is incorrectly stated as 45dB; they should be 50dB, however, given the low predicted construction noise levels at these receptors, this is not expected to materially alter the outcomes of the assessment.	The Applicant acknowledges the incorrect application of the night SOAEL level of 45dB $L_{Aeq,8h}$ to Gwrych House, Sirior Bach and Dinorben Farm and confirms the SOAEL for each of these receptors should be 50dB $L_{Aeq,8h}$. However, this correction does not result in a change to the night period impacts reported in Table 9.25 of ES Volume 3 Chapter 9 [APP-072]. This is reflected in errata (S_PD_1 F03).
REP1-049.88	***Construction vibration*** Groundborne vibration can generate audible sound,	The Applicant refers to paragraphs 1.5.1.13 and 1.3.1.15 of ES Volume 7 Annex 9.2 [APP-179] which confirms that the potential construction vibration impacts from vibratory

Reference	Written Submission Comment	Applicant's response
	'groundborne sound', inside dwellings by causing elements of buildings to vibrate and radiate sound at vibration levels that would be otherwise imperceptible. For works at the ground surface, this is often masked by airborne sound. For subsurface construction activity, there may be little or no airborne sound so groundborne sound may require assessment. Environmental Statement Volume 5, Annex 5.4: Onshore Crossing Schedule sets out the locations at which subsurface trenchless construction will be required, possibly by horizontal directional drilling, which has the potential to create groundborne sound. The risks from groundborne sound are not considered, however the proposed locations all appear to be sufficiently far from residential property that no significant effects would be expected. The methods used to assess construction vibration are described in ES Volume 7, Annex 9.2: Construction Noise and Vibration Technical Report [APP-179]. These are taken from the relevant standard and are appropriate. Table 9.31 of ES Volume 3 Chapter 9 on page 72 presents the vibration impact magnitudes for dynamic compaction46 and vibratory piling. The impact magnitude bands are defined as low, medium and high, with the number of properties within each band determined to assess the extent of any effects. The impact magnitude band distances appear to have been incorrectly calculated, i.e. the width of each band is underestimated, and so the number of impacted receptors within each band is fewer than it should be.	rollers and piling, respectively, have been undertaken using the guidance within BS 5228-2:2009+A1:2014. The use of this guidance, which sets out the methodology for predicting free- field Peak Particle Velocity (PPV) levels at ground-floor level, is in accordance with guidance within Paragraph 3.32 of Design Manual for Roads and Bridges (DMRB) – LA 111 – Noise and Vibration upon which the construction vibration impact magnitude criteria are based. The Applicant also refers to paragraphs 9.9.8.9 to 9.9.8.10 of ES Volume 3 Chapter 9 [APP-072] which describe how the assessment of impacts from construction vibration has been undertaken from the boundary of the Mona Onshore Development area. This approach has resulted in a worst case scenario being presented, with actual construction works either likely to be undertaken further away or, when located at the boundary, will only occur for a short period of time. In addition, the assessment has not included measures to mitigate levels of construction vibration due to the high degree of uncertainty in quantifying any reduction in vibration levels, as noted in paragraph 9.9.8.11 of ES Volume 3 Chapter 9 [APP-072]. Consequently, the Applicant considers the approach it has taken in the assessment of construction vibration, and the overall level of significance of minor adverse, to be robust and appropriate.
REP1-049.89	Furthermore, the empirical predictors determine magnitude of vibration at the ground surface whereas the vibration criteria apply to the point at which they are	The Applicant refers to response (REP1-049.88) above in respect of construction vibration.

Reference	Written Submission Comment	Applicant's response
	experienced by people; normally within a building. When groundborne vibration interacts with a building structure, amplification of floors can occur such that vibration in dwellings is likely to be higher than that at the outdoor ground surface. This appears not to have been considered in the methods described which would potentially lead to appreciable underestimation of the vibration experienced by building occupants and further underestimation of the impact band distances and number of receptors impacted. It is considered that the above points should be clarified by the Applicant and any impact on the outcome of the assessment reported to ensure effects are correctly reported and appropriately mitigated.	
REP1-049.90	***Operational noise*** The assessment of operational noise has been undertaken in line with BS4142:2014+A1:2019 which is appropriate for plant of this nature, however, Figure 1.4 of ES Vol 7, Annex 9.3: Operation Noise Assessment [APP-180] illustrates a 'typical high voltage transformer noise emission spectrum' showing a distinct tone at 100Hz, which is noted in the text and referred to in the assessment. No consideration has been given to specific risks from this low frequency sound and BS4142 states that the standard is not applicable to the assessment of low frequency sound. The standard refers to NANR45, a University of Salford report prepared for Defra[47]. Given the transformer sound level spectrum presented, low frequency sound should have been assessed, otherwise there is a risk that likely significant adverse effects may have been overlooked. The Councils assume that sufficient mitigation will be included within the transformer design to address low	The Applicant refers to paragraphs 1.2.1.16 - 1.2.1.23 in ES Volume 7 Annex 9.3 (APP-180) which include consideration of the 100 Hz component of typical high voltage transformers and their mitigation, such as the use of acoustic enclosures. The Applicant acknowledges the point raised regarding the use of BS 4142 for the assessment of low frequency sound and the reference to NANR45. However, NANR45 is not applicable to planning decision making and more directed at nuisance investigations. Therefore, the Applicant considers the approach it has taken in both the assessment and mitigation of operational noise to be appropriate and that the recommended use of NANR45 as not applicable to this Application.

Reference	Written Submission Comment	Applicant's response
	frequency sound, and request the Applicant to confirm this as it is not clear in the assessment.	
REP1-049.91	***Operational vibration*** No assessment of operational vibration has been undertaken, however, it is noted that the Scoping Opinion[48] Section 3.22 states: With regards to the onshore substation, the Inspectorate is not in a position to agree to scope out this matter as the location of the substation is yet to be determined the distance to any human receptor or historic asset is unknown. Notwithstanding this, in view of the distance to the closest dwellings, it is considered unlikely that vibration from operation would give rise to any significant adverse effects. This should be confirmed by the Applicant.	The Applicant acknowledges the comment made with regards to the omission of an assessment of operational vibration. The Applicant considers that significant adverse effects resulting from vibration during the operation of the Onshore Substation will be avoided through measures adopted to control vibration at source during the design process. Example measures include avoiding direct contact between the equipment and the ground using vibration isolating pads or by mounting the equipment above ground level, as with the oil bunds required for the transformers. Based on the above, in conjunction with the distances to the nearest receptors, The Applicant considers that significant effects due to operational vibration are unlikely, as confirmed in the Councils' comments.
REP1-049.92	3.7.2 Potential Effects Potential adverse effects that could arise are noise and vibration from construction (including construction traffic on the public highway) and from operation of the proposed development. These have been assessed appropriately in general, however, no consideration of potential impacts on soundscapes has been provided. Whilst acknowledging that the Environment (Air Quality and Soundscapes) (Wales) Act 2024 came into force following DCO application and acceptance, the Councils request that the ExA consider whether the Applicant should provide a supplementary assessment which considers impact to soundscapes.	The Applicant acknowledges the comment raised and refers to the response above in REP1-049.86. The Applicant also welcomes the direction from the ExA on the requirement for a Soundscape assessment.
REP1-049.93	***Construction noise*** The approach to assessing construction noise follows appropriate methods and reports minor adverse residual effects which would be not significant. It is likely that construction noise can be sufficiently mitigated that this would be the case although particular attention will be needed to mitigation, including close	The Applicant notes the response.

Reference	Written Submission Comment	Applicant's response
	consultation and engagement with residents, especially in the areas where ambient sound levels are very low.	
REP1-049.94	***Construction vibration*** There appears to have been no consultation regarding vibration limits but assessment criteria have been defined based on an established approach. As noted above, however, the vibration impact magnitudes and number of receptors appear to have been incorrectly calculated and the potential effects therefore under reported. There are methods by which vibration can be minimised although these could extend the duration of the works, for example using static rather than vibratory rollers for compaction; or using hydraulic press-in piling in place of vibratory methods. Methods will need to be developed as part of the Noise and Vibration Management Plan to ensure best practicable means of working are used and impacts are mitigated and minimised as far as is practicable.	The Applicant refers to the response above REP1-049.88 in respect of construction vibration with regard to the reassessment of vibration impacts and effects.
REP1-049.95	***Operational noise*** As noted above, there appears to have been no consideration to low frequency sound, despite the example spectrum for transformer noise indicating a clear tone at 100Hz. If the sound levels indicated in the spectrum are representative of the transformers to be installed, the sound level could be sufficient to exceed the criterion curve for low frequency sound provided in NANR45 at the closest noise sensitive receptors. This is particularly the case given the low ambient and background sound levels. Elected Members have highlighted that local residents have raised concerns regarding existing substation operational noise, and therefore this matter should be addressed by the Applicant within the assessment.	The Applicant refers to the response REP1-049.90 above in respect of operational noise with regard to low frequency sound from the transformers, its mitigation and comparison with NANR45 criteria.

Reference	Written Submission Comment	Applicant's response
REP1-049.96	***Operational vibration*** The Councils agree with the conclusions of F3.9 [APP-072] that there would not be any significant effects from vibration during operation of the proposed development.	The Applicant acknowledges this agreement with its findings.
REP1-049.97	***Cumulative effects*** The cumulative effects assessment is reported in Section 9.11 in F3.9 [APP-072]. It has considered the construction, operation and decommissioning of the proposed development and what is reported appears to be generally appropriate. There is, however, no information on any cumulative effects of noise and vibration from construction traffic, which could potentially be significant if construction programmes overlap and common access routes are used. The Councils consider that the Applicant should clarify why this has not been included.	Although the construction of the proposed development overlaps with that of the Awel y Mor Offshore Wind Farm, a review of the construction traffic noise assessment – local road network for the Awel y Mor scheme identified that reported construction traffic noise impacts were negligible to low, with traffic noise level changes predicted to be below 1dB on a majority of the routes. Consequently, the Applicant concluded that cumulative significant construction noise and vibration effects from construction traffic from both the Awel y Mor scheme and the proposed development were unlikely to be occur and therefore were screened from further assessment.
REP1-049.98	3.7.3 Mitigation / Management Proposals Section 9.3 of F3.9 [APP-027] describes embedded mitigation measures that would be incorporated as part of the scheme, which are appropriate and would be expected to mitigate and minimise impacts. Additional mitigation measures required are described in Section 9.9 where required. It should be possible to mitigate construction noise and vibration through the development of a robust Code of Construction Practice (CoCP) / Construction Environmental Management Plan (CEMP), which includes traffic noise impacts. Essential to this will be early and effective engagement with residents and business owners, particularly given the very quiet locations of much or the works. Further consideration of construction vibration is, however, needed to ensure that all potentially affected properties are included in the assessment and design of	An Outline Code of Construction Practice (CoCP) has been prepared (Document Reference J26) which includes measures to control construction impacts, The CoCP is supported by an Outline Construction Noise and Vibration Management Plan (Document Reference J26.3) which sets out general measures to control construction noise and vibration. The Outline Construction Noise and Vibration Management Plan also includes examples of measures that can be applied to specific construction activities. The implementation of these measures has been assessed in the Construction Noise and Vibration Technical Report (Document Reference F7.9.2), which takes into account baseline sound levels. The Applicant will engage with the relevant planning authority to define these measures (including vibration measures) during the detailed design process and will be agreed with the relevant planning authority. The Construction Noise and Vibration Management Plan is part of the CoCP, which is secured through the DCO (See Mitigation and Monitoring Schedule – Document Reference J10 F02). Local residents will be kept informed when construction works will take place and the duration of the works (as set out in the Outline Communication Plan (Document Reference J26.4)). The Applicant refers to the response above with regard to the consideration of low frequency sound during operation. .

Reference	Written Submission Comment	Applicant's response
	mitigation. Mitigation of operational noise impacts will need to consider in particular the low frequency sound emitted by transformers, although it is stated in paragraph 9.9.9.17 that appropriate enclosures can be provided to reduce the sound at 100Hz by 20dB, which may be sufficient. It is understood that the provision of such enclosures is secured via the design principles document and requirement 5 of the DCO.	
REP1-049.99	3.7.4 Summary Overall, the approaches and assessment are appropriate but further consideration of construction vibration is required to ensure adequate mitigation is provided. Construction noise will be clearly audible in many locations, although it is likely working within appropriate criteria should be achievable. Sensitive and early engagement with local communities will be essential to minimise complaints. Construction vibration has been incorrectly assessed such that the magnitude and extent of impacts has been underestimated. Low frequency operational sound from the transformer compound will need to be adequately mitigated. No consideration of impacts on the soundscape have been considered, which are now required under the very recently introduced Soundscape Act. The cumulative effects assessment has not considered noise and vibration from construction traffic, which could potentially be significant if construction programmes overlap and common access routes are used.	The Applicant notes the comments in CCBC and DCC's LIR and confirms that its response is provided in REP1-049.86, REP1-049..88 and REP1-049.95.
REP1-049.100	3.8 Trees and arboriculture 3.8.1 Assessment Methodology and Baseline In undertaking this review the following documents are referenced and have been reviewed:	The Applicant notes the response.

Reference	Written Submission Comment	Applicant's response
	• F7.6.6 Tree survey and arboriculture impact assessment [APP-160-167] • B14 Tree and Hedgerow Plan [APP-019] • J22 Outline Landscape and Ecology Management Plan [APP-208] • J26 Outline Code of Construction Practice [APP-212] • J26.18 Outline Arboriculture Method Statement [APP-230] • F5.4.3 Onshore Crossing Schedule [APP-083] • Consultation Report E3 [APP037-APP040] • Relevant statutory consultation responses and Relevant Representations	
REP1-049.101	***Baseline Surveys*** A detailed survey of trees, woodlands and hedges within and within influencing distance of the Order Limits was carried out as a baseline assessment, in accordance with British Standard BS5837:2012.49 CCBC required in their pre-application consultation response (dated 16th June 2023) a full survey, to BS5837, of trees within and within influencing distance of the development in order for the impact of the proposals to be adequately assess. This is also a requirement of local planning policies: CCBC's SPG (LPD40), and DCC's Policy RD1. The survey results are reported in the Arboricultural Impact Assessment (AIA) and its appendices. Trees have been surveyed as individual trees, groups of trees and woodlands. Hedges have also been surveyed. The crown extents, heights, species, condition and main characteristics of all of these features have been assessed and reported in the Tree Schedule at Appendix 1. Root Protection Areas (RPAs) have been calculated from measured stem diameters and plotted, along with crown spreads on the Tree Survey Plan and Tree Protection Plan.	The Applicant notes the response. The Applicant notes that the method of calculating the RPA for groups of trees is in accordance with the guidance in BS5837:20132 and uses the average stem diameter of the trees within the view or the largest stem diameter. The Applicant can confirm that a combination of GPS, onsite measuring and aerial photography was used to identify the location of trees during the survey.

Reference	Written Submission Comment	Applicant's response
	The methodology for calculating RPAs for groups of trees has not been reported, but from visual observation they appear adequate. Veteran trees and ancient woodland have been afforded an additional buffer, in line with Natural England Standing Advice50. Each tree, tree group, woodland and hedge has been assigned a retention category (A, B, C, U) according to the criteria of BS5837:2012. Locations of trees on the survey have been informed by 'digital and onsite positioning'. It is presumed that this refers to GPS, onsite measuring and perhaps aerial photography, although this is not made explicit. No topographical survey information on trees has been provided. However, given the nature of the Order Limits in terms of size, the approach taking to tree plotting and the level of accuracy is reasonable and acceptable.	
REP1-049.102	However, according to section 1.8.1.2 of the AIA, around one third of the Order Limits (the Onshore Cable Corridor) was not accessible for the surveyors, and in this area, trees have been surveyed from afar and plotted using aerial photography. As no ground-level survey was conducted, most of the characteristics of these trees, including their RPAs, stem diameters, veteran status, age class, estimated life expectancy and condition, have been estimated. Impacts on these trees can therefore only be assessed in general terms. A generic methodology has been proposed to deal with trees in these areas by which trees are subjected to an assessment of their likelihood to constrain development based on their likely proximity to construction activities (a BRAG system). This is not an adequate substitute for a detailed assessment of the impact of the proposals on trees because it cannot properly take into account the required Construction Exclusion Zones needed for each tree, as these are based on RPAs which could not be calculated, or veteran status (veteran trees are afforded	The Applicant notes that land access was restricted in some areas of the Mona Onshore Development Area during the 2023 survey. An understanding of the wider arboricultural landscape in North Wales and supporting information from the onshore ecology surveys were used to together with the observations from aerial photography to define a precautionary buffer to the trees in the section of the Onshore Cable Corridor ensure that where the survey could not be undertaken. The methodology of the AIA (as set out in Volume 7, Annex 6.6: Tree survey and arboricultural impact assessment (APP-160)) has applied the maximum RPA advised in section 4.6.1 of BS5837 for trees that were not surveyed. The Applicant considers that the baseline assessment of trees is adequate. The Applicant notes that the arboricultural survey on the remaining land parcels was completed in July 2024 and a clarification note on the survey findings will be submitted at Deadline 3. The note will confirm that the baseline information presented in the DCO application is sound and the results will be used to inform the detailed design of the Onshore Cable Corridor. .

Reference	Written Submission Comment	Applicant's response
	specific protection under PPW 12) and also require an extended buffer zone around their RPAs. Section 1.6.1.1 of the AIA states that trees in the areas that could not be accessed will be surveyed during the pre-construction stage. However, at that stage it may be too late to modify the design to avoid the removal of or unacceptable impacts on irreplaceable habitat (veteran trees) or high value (Category A) trees. Insofar as can be judged without on-site verification, for the areas (roughly two thirds of the Order Limits) subject to detailed survey, the baseline assessment of trees is acceptable, and conforms to both BS5837:2012, CCBC's SPG (LPD40), and DC's Policy RD1. The Councils suggest that for the areas that could not be accessed, the information is inadequate to assess the true impacts. Access should be sought by the Applicant, and a detailed ground-based tree survey should be conducted in accordance with BS5837: 2012 prior to the emergence of the detailed design for the Onshore Cable installation.	
REP1-049.103	***Statutory Protection*** A desktop exercise to establish the existence of statutory protections covering the trees/woodlands within the Order Limits is presented within the AIA. There are no Tree Preservation Orders (TPOs) covering trees within or within influencing distance of the Order Limits within Denbighshire County. Several TPOs potentially cover trees within Conwy Borough to the north of the Order Limits; however, the positional data supplied by CCBC does not match the physical location of trees plotted in the survey in this area. The AIA therefore is not able to identify which trees may be covered by TPO. The areas identified on the TPO are few in number, and it should therefore be possible to avoid negative impacts on TPO trees; however, this	The Applicant has plotted as accurately as possible the TPO positional data supplied by CCBC and the physical locations of the trees mapped in the survey. The Applicant notes there are some instances where the TPOs identified in the CCBC data are inconsistent with the tree survey data (e.g. the trees are no longer present). The Applicant will review the tree survey data and the TPO positions from the CCBC and provide a clarification in the tree survey note to be submitted at Deadline 3. The Applicant notes that Conservation Area designations are reported in Volume 7, Annex 5.1: Desk based assessment (APP-143). The closest Conservation Area is the Abergele Conservation Area, however, it is outside the Mona Onshore Development Area.

Reference	Written Submission Comment	Applicant's response
	cannot be accurately assessed without additional work to match the TPO records with the tree survey data. This exercise should be undertaken by the Applicant. Conservation Area designations are not reported, and so are presumed to be absent within the Order Limits. This should be expressly stated in the assessment for avoidance of doubt.	
REP1-049.104	***Special Designations*** Ancient woodland and veteran trees are afforded special protection from development in section 6.4.43 of PPW12. Ancient woodland within or within influencing distance of the Order Limits has been identified with reference to DataMap Wales (a dataset based on the national Ancient Woodland Inventory) and is identified on the Tree Survey Plan, Tree and Hedge Protection Plan and Tree and Hedgerow Plan in sufficient detail for the effects on Ancient Woodland to be assessed. Veteran trees are identified on the Tree and Hedgerow Plan (B14), based on acceptable criteria set out in the AIA. Of the 12 veteran trees identified during the survey, only 3 are within the order limits. However, the presence of veteran trees within the area assessed with reference to aerial photography has not been assessed, and therefore the data is incomplete in this regard. No reference has been made to the Ancient Tree Inventory to cross-reference the surveyed data with this dataset, as recommended in PPW12. This exercise should be undertaken by the Applicant. Important hedges covered by the Hedgerow Regulations (1997) are identified on the Tree and Hedgerow Plan (B14) in sufficient detail for the impacts to be assessed.	The Applicant has used the DataMap Wales to identify the location of the ancient woodland, which has informed the site selection process (as described in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-016)). Where ancient woodland interacts with the red line boundary, the ancient woodland has been collectively surveyed in line with section 4.4.2.3 of the BS5837.
REP1-049.105	3.8.2 Potential Effects ***Construction Phase*** The construction phase will have several negative effects on trees, woodland and hedges.	The Applicant confirms that a temporary haul road within the Onshore Cable Corridor has been considered in the AIA, however it is not shown on the Tree and Hedgerow Protection Plan because location of the haul road will be confirmed during detailed design.

Reference	Written Submission Comment	Applicant's response
	Removal of an estimated 55 trees will be required to secure the installation of the substation and compounds, including associated site access, as identified in the AIA at section 1.10.1.5. It is not clear whether the assessment in the AIA also considers the temporary haul road, which is not shown on the Tree and Hedge Protection Plan. This should be clarified by the Applicant. Although shown on the Tree and Hedge Protection Plan, tree removals are difficult to assess in terms of landscape impact and BS retention category as they are not tabulated. It would be helpful for the trees recommended for removal were tabulated along with their retention categories. It would also be helpful if the scale of this drawing were to match the Tree Survey Plan and the sheets numerated for ease of reference. Further, the precise number of trees that will require removal cannot be ascertained until the precise route of the onshore cable and the means of installation are known (only the maximum extents of the cable corridor/Order Limits are currently shown on the relevant plans), and the roughly one third of the Order Limits that has been assessed with reference to aerial photography only has been subject to a detailed survey.	The Applicant notes that a final Tree Removal and Protection Plan will be prepared during the detailed design stage for the relevant stage of work that will show the location and category of trees to be removed but as noted by CCBC and DCC. Detailed information is not available at this stage so that information cannot be produced until post-consent detailed design has taken place. The final Tree Removal and Protection Plan will be included within the final Arboricultural Method Statement. The Arboricultural Method Statement forms part of the Code of Construction Practice which is secured through Requirement 9 of the DCO.
REP1-049.106	50 of the trees will be removed from the Onshore Substation area, representing around 25% of the total 222 individual trees surveyed in this locality. The remaining 5 will be removed to facilitate the construction of one of the site compounds, and represent a small proportion of the total number of trees within the Order Limits. Given the scale of development, the number of tree removals as stated in the AIA is acceptable. However, given the lack of detailed assessment of the impacts of the cable route	The Applicant refers to its response to REP1-049.102 to explain how a precautionary buffer has been applied to the trees within the Onshore Cable Corridor that were not included in the 2023 survey. This has been used to inform the assessment within the tree survey and arboricultural impact assessment.

Reference	Written Submission Comment	Applicant's response
	on retained trees, the true number of trees that will require removal cannot be assessed.	
REP1-049.107	Construction compounds are generally located in areas with few trees. Where larger trees are located at the peripheries of the construction compounds, these trees have been proposed to be retained with their RPAs/canopy extents fenced off by tree protection fencing, effectively removing these areas from use within the compound. This is an appropriate measure and impacts of the construction compounds, aside from the 5 trees to be removed noted above) will therefore be negligible provided that protection measures are followed.	The Applicant notes the response.
REP1-049.108	Installation of the Onshore Cable will have a negative impact on trees and hedges growing along the cable corridor, particularly at field boundaries, due to encroachment on their RPAs, which could lead to root damage, and removal of hedge lengths. The Tree and Hedge Protection Plan and Onshore Obstacle Crossing Plan give relatively precise locations of field boundary crossings (small circles coloured red, orange or green to denote trenched, trenched/ trenchless and trenchless installation, respectively), suggesting that a draft cable route has been planned out, yet the actual linear route is not shown on either drawing. If a route has been chosen then it should be displayed and the precise impacts tabulated to clearly demonstrate the impacts.	The Applicant notes that the Onshore Crossing Schedule (Document Reference F5.4.3 F03) identifies the indicative location of existing obstacles along the Onshore Cable Corridor and notes how these obstacles will be crossed. The type of crossings set out in the Outline Crossing Schedule have been used to provide a maximum design scenario for the assessment. The field boundary crossing locations provided in the Onshore Crossing Schedule (Document Reference F5.4.3 F03) are indicative, the precise locations of the crossings and the finalised cable route within the (Onshore Cable Corridor) will be determined during detailed design.
REP1-049.109	Trenchless installation will be used in many places to avoid having to remove or damage trees or hedges, which is favourable. However, it is not clear why some field boundaries will be traversed using trenched vs trenchless techniques, what the constraints may be to the successful use of trenchless techniques, and how a decision will be made between the two options where the trenched/trenchless option is indicated. In principle, a commitment to trenchless	Trenchless techniques are significantly more expensive and complex than open-cut trenching, therefore it is not possible for the Applicant to commit to crossing all hedgerows using trenchless techniques. The Applicant has committed to crossing all ecologically important hedgerows (as defined in the Hedgerow Regulations 1997) using trenchless techniques (see Onshore Crossing Schedule (Document Reference F5.4.3 F03). For those hedgerow crossings where both trenching and trenchless techniques are still being considered, a decision will be made during detailed design depending on the outcome of engineering surveys such as ground investigations as to the most appropriate technique.

Reference	Written Submission Comment	Applicant's response
	techniques to avoid damage to, or the removal of, all trees and hedges affected by the cable installation (including location of the temporary haul road) should be made, a requirement previously set out by DCC in its pre-application response.	As set out in the Onshore Crossing Schedule, where trenching is used to cross hedgerows, detailed design will seek, where practicable to minimise hedgerow removal by using existing gaps in hedgerows (section 1.7.3.1 of the Outline landscape and ecology management plan (Document Reference J22 F02)). The detailed design will also seek where practicable to avoid the root protection zones of trees at these crossings. The Outline landscape and ecology management plan is secured through Requirements 7 and 12 of the DCO. The Applicant can confirm that along the Onshore Cable Corridor all hedgerows that require removal for the purposes of onshore export cable installation will be re planted following completion of construction, as confirmed in the Outline Onshore Construction Method Statement (Document Reference J26.14 F02). The Onshore Construction Method Statement forms part of the code of construction practice, which is secured through requirement 9 of the DCO.
REP1-049.110	The cable route passes through Gwrych Castle Wood, which has been identified as a Plantation on Ancient Woodland Site (PAWS). The Tree and Hedge Protection Plan and Onshore Obstacle Crossing Plan indicate that trenchless installation will be carried out to span the approximately 150 m distance across the woodland. Whilst trenchless drilling can in theory be achieved for such spans, it is not clear how this would be achieved given the relatively steep gradient of the wood, which could hinder the use of directional drilling. The consequences should trenchless installation not be feasible would be the cutting of a wide swathe through the woodland and extensive tree removal, as well as damage to the complex soil of ancient woodland that remains beneath the more recently planted trees, which is the chief value of PAWS. The Councils would like to request a feasibility report on the use of directional drilling through Gwrych Castle Wood, including details of the depth of the drilling and the location of the launch and reception pits and equipment compounds to demonstrate that adverse impacts to this Ancient Woodland can be avoided.	The Applicant commissioned an outline feasibility report which has assessed the suitability of trenchless techniques for the drill below Gwrych Castle Wood. The output of the report has indicated that it will be possible to achieve a trenchless crossing of the whole area of Ancient Woodland. The indicative profiles presented in the outline feasibility report show that the trajectory of the crossing below the Ancient Woodland varies from between 2m at the launch and reception pits to a maximum depth of 22m under the footprint of the woodland. The drill profiles, technique and trenchless technique laydown areas will be further developed during detailed design. A buffer of at least 15m will be established from the boundary of ancient woodland and any construction activities, except for where trenchless techniques pass under ancient woodland, in accordance with current UK guidance (see paragraph 1.7.2.3 of Volume 7, Annex 6.6: Tree survey and arboricultural impact assessment (Document Reference F7.6.6) and the Outline LEMP (Document Reference J22 F02).

Reference	Written Submission Comment	Applicant's response
REP1-049.111	There do not appear to be any impacts on veteran trees insofar as this could be assessed from the incomplete data.	The Applicant notes the response.
REP1-049.112	Document B14 Tree and Hedgerow Plan [APP-019] identifies hedges likely to be removed to facilitate the Onshore Cable installation, including hedges identified as Important under the Hedgerow Regulations (1997). These hedges are also itemised as consented for removal in the draft DCO. No attempt has been made to tabulate the total length of hedges to be removed. It is also unclear whether the entire lengths of the hedges identified for removal on the plan would in fact need to be removed. The maximum width of the cable trench plus construction access would presumably be a matter of a few metres in width rather than the full 74-100 m span of the cable corridor. Further, the removal of hedges on the Tree and Hedgerow Plan appears to be inconsistent with the Tree Protection Plan and the Onshore Crossing Obstacles Plan, which indicate that trenchless installation will be used at various locations that would avoid the need for hedge removal. Hedge crossings where trenchless boring will be used should be identified on the Tree and Hedgerow Plan. The Councils suggest the draft DCO should then also be revised to show the removal of only those hedges for which trenched installation cannot be avoided.	The Tree and Hedgerow Plan (APP-019) has been provided in line with the Infrastructure Planning (Applications: Prescribe Forms and Procedures) Regulations 2009, which require a plans to be submitted identifying "*any statutory and non-statutory sites or features of nature conservation*" therefore its purpose is to show important and non-important hedgerows (as defined in the Hedgerow Regulations 1997), areas of Ancient Woodland and veteran trees which are to be removed as part of the development (in line with the details set out in Schedule 11 of the draft development consent order – Document Reference C1 F04). The Onshore Crossing Schedule (REP1-007) identifies obstacles, including hedgerows, to be crossed by the haul road, onshore export cables and 400kV grid connection cables. This indicates the method by which the Applicant proposes to cross those obstacles. Crossing hedgerows using trenchless techniques does not necessarily mean that powers contained in the draft development consent order (Document Reference C1 F04) should not apply to those hedgerows as there may be circumstances in which removals are still required, for example in the event the haul road requires a section of hedgerow to be removed but the rest of the hedgerow will be retained in situ through the use of trenchless crossing techniques. There are also some hedgerows listed in Schedule 11 which will not appear on the Onshore Crossing Schedule for example within Mona Onshore Substation where there are no cable crossings. It is not possible to confirm the exact lengths of hedgerow to be removed at this stage as the final onshore cable route and installation technique has yet to be confirmed. Further, the Tree and Hedgerow Plan (APP-019) identifies the full length of the hedgerow within the cable corridor as hedgerow may be removed from a section at any point along that length. For the purposes of assessment, a worst-case scenario of 7km of hedgerow loss has been assessed, including • 5.4 km of hedgerow loss for hedgerows crossed using open trenching (73 hedgerows with a maximum width of 74 m including the haul road) • 400 m for the construction haul road through hedgerows at locations where trenchless techniques are used (57 hedgerows with a maximum width of 7 m) • 200 m of hedgerow loss to accommodate for the Onshore Substation and associated Temporary Construction Compounds • 1 km of hedgerow loss to allow access and appropriate visibility splays.

Reference	Written Submission Comment	Applicant's response
		The Applicant has provided an updated Hedgerow Clarification Note (Document Reference S_D1_5.8 F02) to further explain the approach to hedgerows and to clarify the inconsistencies highlighted in CCBC and DCC's LIR. The Applicant has also updated Schedule 11 of the draft development consent order (Document Reference C1 F04) to ensure all hedgerows which may need to be removed are listed.
REP1-049.113	***Operational Phase*** The AIA states that no trees would need be affected during the operational phase, except where their poor condition mandates removal for safety reasons. The Applicant's response to the Woodland Trust query reported in Table 1.1 of the AIA states that in the unlikely event that work near a retained tree were required during the maintenance period, a method for works to minimise damage would be agreed with the relevant tree officer. Whilst this is in principle reasonable, it is difficult to see how this might be enforced, although the likelihood of this scenario is low. The impact of radiation heat from the buried cable on the soil and roots of trees and woodlands is likely to be minimal as the cable will lie at 1.8 m deep, which is around 1 m deeper than upper 600 mm where the majority of tree roots grow. It can be concluded that the impacts of operational phase on trees and woodlands are likely to be negligible.	The Applicant notes the response.
REP1-049.114	***Decommissioning Phase*** The effects at the decommissioning stage are likely to be minimal, as the buried onshore cable will be left in situ and capped off at the ends. Access for plant and materials near trees may be required in the decommissioning of the substation, but provided that suitable tree protection is put in place prior to the commencement of the decommissioning works, the impacts should be negligible.	The Applicant notes the response.
REP1-049.115	3.8.3 Mitigation / Management Proposals ***Mitigation of Construction Impacts on Retained Trees/Woodlands/Hedges*** An Outline Arboricultural Method Statement (AMS)	The Applicant confirms that the term 'visual barriers' as referred to in the Tree and Protection Plan and the AIA relates to low specification fencing which are implemented where construction is located a reasonable distance away, but the barriers are installed only as a precautionary approach.

Reference	Written Submission Comment	Applicant's response
	[APP-230] has been produced as part of the Outline Code of Construction Practice that sets out broad principles for the mitigation of impacts through tree, woodland and hedge protection during the construction phase. A detailed Arboricultural Method Statement (AMS) would be produced prior to the commencement of construction works. The main principle followed for the tree protection is that of exclusion with physical barriers erected so as to protect the RPA/canopy extent. This principle is reasonable and follows best practice as set out in BS5837: 2012. The Tree and Hedgerow Plan and AIA also make reference to 'visual barriers'. It is not clear what is meant by these, but if it refers to low specification fencing in areas far from construction activities then this is acceptable. Clarity from the Applicant is sought on this matter.	
REP1-049.116	The issue of avoiding damage to trees, woodlands and hedges during cable installation is dealt with by reference to NJUG 4[1] which is guidance put together by the utilities industry to minimise damage to trees. In principle this is acceptable, but a decision hierarchy would be helpful to understand how decisions will be made about the retention of trees that may be heavily impacted by the installation of the cable route and should be included in the detailed AMS. Principles in the approach to minimising other construction impacts such as soil compaction, dust, and the timing and monitoring of works are all acceptable, and would be worked out in detail in the detailed AMS.	The Applicant notes the response and confirms that a decision hierarchy will be included in the final Arboriculture Method Statement. The Arboriculture Method Statement forms part of the code of construction practice, which is secured through requirement 9 of the DCO.
REP1-049.117	NPS EN-1 mandates that measures must be put in place to mitigate the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats. PPW 12 similarly	The Applicant refers to the response in REP1-049.110.

Reference	Written Submission Comment	Applicant's response
	mandates that ancient woodlands, as irreplaceable natural resources are to be protected from development that would result in their loss or deterioration. Section 1.4.1.6 of the AIA states that impacts to ancient woodland, veteran trees and their RPAs have been avoided by the direct impacts of the Onshore Cable Corridor and Onshore Substation. However, as the cable route crosses an ancient woodland (PAWS) and given the lack of detail on the feasibility of trenchless installation through this area, the absence of direct effects has not been comprehensively established, and therefore whether the mitigation proposed is suitable cannot be assessed.	
REP1-049.118	To ensure that trees, woodland and hedges can be successfully retained, a detailed arboricultural method statement should be produced prior to construction that sets out: • A schedule and plan of all trees and hedges to be removed, including maximum lengths of hedges to be removed • Locations and specification of tree protection fencing • Locations and specification of ground protection (if required) • Location and installation method of haul road • Location of launch and reception pits, construction compound for directional drilling • Timing of operations and schedule of arboricultural supervision and key sign-off milestones	The draft Development Consent Order secures the provision of a detailed Arboricultural Method Statement at Requirement 9 which will be substantially in accordance with the Outline Arboricultural Method Statement (J26.18 F02). The detailed Arboricultural Method Statement will be discharged by the Local Authorities. The location and installation of the haul road and the launch/reception pits and the construction compounds for trenchless techniques will be defined in the final Onshore Construction Method Statement. The Arboricultural Method Statement and the Onshore Construction method Statement form part of the CoCP which is secured through requirement 9 of the DCO.
REP1-049.119	***Mitigation Planting*** Extensive woodland planting is proposed around the Onshore Substation, as described and depicted in the OLEMP [APP-208]. Woodland establishment will be achieved by both planting and natural regeneration. Species chosen for planting will be mixed broadleaves, and an acceptable species palette has been provided. Final species choice should be suitable for the local soil	The Applicant notes the response.

Reference	Written Submission Comment	Applicant's response
	type. The OLEMP gives appropriate overview of the requirements for the establishment of new woodland.	
REP1-049.120	In places, there are mature trees in the areas proposed for new woodland planting. Suitable offsets between new plantings and these trees must be observed to prevent them being out competed or shaded out. New native hedge planting is also proposed around the substation and to replace removed hedges elsewhere. New hedges are to be planted with individual standard trees at intervals along their length, which is favourable, and will increase tree cover across the Order Limits. Existing hedges will be gapped up. However, no detail of these measures has been given.	The Applicant confirms that information on hedgerow planting (as set out in CCBC and DCC LIR) is not currently provided in the Outline LEMP. The Applicant considers that this information will be defined by detailed design and is not appropriate to include detailed planting information in the Outline LEMP. The Applicant will engage with the relevant planning authority to prepare a planting schedule based on the principles set out in the Outline LEMP.
REP1-049.121	Under PPW12 (section 6.4.42), any trees removed must be replaced at a ratio of 3:1, and any woodland block removed must be replaced at a stocking density of 1,600 trees per hectare. Given the lack of detail on numbers of trees planted, it is not possible to assess whether this policy has been met. The final LEMP should demonstrate that this requirement has been met by numerating the number of trees lost to development and those planted. The Councils suggest a commitment to replant open-grown trees removed from elsewhere in the cable corridor close to their original locations to mitigate the local impacts of their loss. CCBC in their S42 response requested *'tree/woodland management plans and detailed replanting or mitigation planting plans with sizes, species, locations etc. provided together with location plans were requested to be submitted as part of the application so the recovery of trees and woodland could be fully assessed'.* These details would be provided in the final LEMP.	The Applicant confirms that proposed woodland and hedgerow planting would achieve a replacement tree planting ratio of at least 3:1 as set out in the Design Principles (APP-189). The number of trees that will be planted will be defined in the planting mix that will be prepared and agreed with the relevant planning authority. The planting mix will be provided the detailed Landscape and Ecology Management Plan (in accordance with the indicative planting mixes in the Outline Landscape and Ecology Management Plan (J22 F02)) which is secured by Requirement 12 of the draft Development Consent Order.

Reference	Written Submission Comment	Applicant's response
REP1-049.122	***Maintenance*** The OLEMP sets out broad principles for the ongoing maintenance of both existing and newly planted trees, woodland and hedges (e.g., stake removal, replacement of losses, pruning for health and safety, woodland thinning, regular hedge cutting) that should, if followed, ensure the longevity of the existing and new features. Detail is lacking in some places, but the principles are sound. The required detail should be set out in the final LEMP, and detailed woodland management plans should be produced, as set out in Appendix 2 of the OLEMP, for the new woodlands.	Please see REP1-049.22.
REP1-049.123	3.8.4 Summary The tree survey baseline data where access was gained is complete and acceptable. However, the tree survey lacks a detailed survey on trees and hedges within around one third of the Onshore Order Limits, meaning that the full impact on trees and woodland cannot be adequately assessed. Completion of the survey will be required to be able to elucidate the full arboricultural impacts of the development and the AIA updated. All trees and lengths of hedges identified for removal should be tabulated.	The Applicant notes that the remaining tree survey has been completed (please see the response in REP1-049.102
REP1-049.124	Impacts on trees as currently assessed in the AIA are minimal. However, there is uncertainty over the impact of the cable installation and associated construction infrastructure. To avoid excessive tree/hedge damage or removal, a presumption towards trenchless cable installation should be adopted where trees, woodlands and hedges would be affected, with a clear rationale where such techniques are infeasible.	The Applicant refers to the response in REP1-049.109.
REP1-049.125	The feasibility of trenchless crossing of Gwrych Wood (ancient woodland) has not been established. This will be required to demonstrate that there will be no unacceptable impacts on the woodland.	The Applicant refers to the response in REP1-049.110.

Reference	Written Submission Comment	Applicant's response
REP1-049.126	Mitigation proposals involve the extensive planting of trees and woodlands. However, in the absence of a full assessment of the impacts of the development, it is not possible to determine whether adequate ratios of losses to mitigation have been achieved; this will need to be set out in the final LEMP.	The Applicant refers to the response in REP1-049.121.
REP1-049.127	The following are to be secured via DCO Requirements. • a detailed Arboricultural Method Statement; • a detailed plan for the protection and retention of existing trees and hedgerows • a detailed tree/hedge removal and retention plan • a detailed LEMP with subtending Woodland Management Plan • revised Schedule 11 (hedges to be removed)	The Applicant notes the response.
REP1-049.128	3.9 Heritage Comments on heritage matters are provided by both Heneb and the CBCC Conservation Officer. Heneb represents four merged archaeological trusts as of April 2024; Gwynedd, Dyfed, Clwyd- Powys and Glamorgan-Gwent. Heneb has engaged with the Applicant in the pre-application period through the Archaeology and Heritage Engagement Forum (AHEF). 3.9.1 Heneb The written response from Heneb is appended to this document at Appendix A. In summary, it confirms that a Statement of Common Ground (SoCG) between the Applicant and Heneb has been agreed, which reflects that there is agreement between the parties on all aspects of the environmental assessment relating to onshore archaeology and cultural heritage. Whilst trialtrenching is ongoing, this is not considered likely to result in any changes to the conclusions of the ES. Heneb is in agreement with the provisions of the draft DCO to	The Applicant notes the response. The Applicant has engaged with the Gwynydd and Clwyd-Powys arms of Heneb only as the relevant local advisory body. Details of this engagement is set out in the Statement of Common Ground with Heneb (REP1-035).

Reference	Written Submission Comment	Applicant's response
	sufficiently secure further details and implementation of archaeological mitigation post-consent.	
REP1-049.129	3.9.2 CBCC Conservation Officer comments The following documents have been assessed in detail, as well as associated plans. • F3.5: Historic environment [APP-068] • F7.5.2: Historic environment policy and guidance [APP-144] • F7. 5.7: Settings assessment (offshore infrastructure) [APP-151] CBCC's Conservation officer is supportive of the methodology used in determining the potential impacts on the historic environment. Overall, it is concluded that there will be the following likely significant effects arising from the Mona Offshore Wind Project during the construction, operations and maintenance or decommissioning phases: • Effects of up to moderate adverse significance arising from loss of, or harm to, buried archaeological remains and deposits of geoarchaeological and palaeo-environmental interest during construction • Effects of up to moderate adverse significance arising from the loss of, or harm to, the Gwrych Castle Grade II* Registered Park and Garden during construction CBCC's Conservation officer does not dispute the above.	The Applicant notes the response, it is welcome that the CCBC Conservation Officer concurs with the assessment of effects in respect on the historic environment.
REP1-049.130	When the Mona Offshore Wind Project is considered along with Tier 1 existing offshore wind farms and the consented Awel y Môr offshore wind farm, potential cumulative effects are most likely to be experienced in respect of designated heritage assets in mainland North Wales and in the area extending east from the Great Orme to Point of	The Applicant notes the response, it is welcome that the CCBC Conservation Officer is generally supportive of the proposed works.

Reference	Written Submission Comment	Applicant's response
	Ayr. Document F3.5 [APP-068] paragraph 5.12.6.6 identifies that in some cases this could result in a moderate adverse effect, which is significant in EIA terms. This is considered likely to apply to the following designated historic assets: • Creuddyn and Conwy - Registered Historic Landscape • Registered Park and Garden and Grade II* listed building • Gwrych Castle - Grade II* Registered Park and Garden and Grade I listed building • Buildings in Llandudno (including seafront), pier, lighthouse and Happy Valle RHPG	
REP1-049.131	CBCC's Conservation officer has been in previous discussions with Wardell Armstrong in regard to the proposed widening of an existing access on the listed boundary wall to Gwrych. A Listed Building Consent application will be submitted shortly. CBCC's Conservation officer is generally supportive of the proposed works. Heneb will provide more detailed comments on the adequacy of the below ground approach, however using trenchless techniques to minimise the impact on the RHPG at Gwrych is welcomed.	The Applicant can confirm that a Listed Building Consent application was submitted to CBCC's Conservation officer on Monday 5th August 2024. The reference number is PP-13228145. The application has been validated by CCBC, and the Applicant is continuing to engage with the CCBC Conservation officer in this matter. It is welcome that the CCBC Conservation Officer is generally supportive of the proposed works.
REP1-049.132	3.9.3 Summary There are no significant concerns arising in relation to heritage and archaeology.	The Applicant notes the response.
REP1-049.133	3.10 Cumulative impacts 3.10.1 Assessment Methodology and Baseline In undertaking this review the following documents are referenced and have been reviewed: • F5.5.1: Cumulative effects screening matrix [APP-084] • F1.5 EIA Methodology [APP-052] • F1 ES Non-Technical Summary [APP-047]	The Applicant notes the response.

Reference	Written Submission Comment	Applicant's response
	• J2 Planning Statement [APP-186] The Councils were consulted during the pre-application process on the list of projects to be included in the cumulative effects assessment (CEA). DCC submitted a list of projects to be added to the CEA in its S42 response in June 2023. DCC confirms that these projects have been added to the CEA provided with the DCO application. Whilst the Councils broadly concur with the assessment methodology and baseline for the CEA, the following comments and queries would benefit from clarification by the Applicant.	
REP1-049.134	***Presentation of cumulative effects*** The ES provided with the DCO application does not have a separate chapter to report on the CEA, rather, the cumulative effects are assessed and presented within each topic specific chapter. This is recognised as a valid approach. However, the Councils consider that the lack of an overarching summary or conclusion within the ES reporting on the total number of significant cumulative effects, for example in a summary or in the Non-Technical Summary [APP-047] makes it difficult to understand or appreciate the overall outcome of the CEA. The Councils have identified that the Planning Statement [APP-186] at paragraph 1.6.4.5 provides a summary list of all significant cumulative effects, however this is not split into offshore and onshore effects as per ES topics. It is requested that the Applicant clarifies the overall conclusions of the CEA across all topics, in a combined summary.	The Applicant notes that the conclusion of cumulative effects assessments for each environmental topic is reported within each topic chapter of the Environmental Statement. A summary of the cumulative effects assessment is also reported in the topic chapter sections of the Non-Technical Summary (APP-047). The Applicant notes the request for a combined summary of the overall conclusions of the cumulative effects assessment, and that a list of significant cumulative effects was included in the Planning Statement (APP-186). The Applicant confirms that no significant cumulative effects have been identified for onshore with the exception of historic environment, where significant cumulative effects were identified on the settings of terrestrial designated heritage assets from the Mona Array Area. The significance of this effect is attributed to the Awel y Mor Offshore Wind project due to its proximity to the shore rather than the contribution of the Mona Offshore Wind Project. Therefore, the Applicant considers that the combined summary of the significant cumulative effects as set out in the Planning Statement (APP-186) remains unchanged.
REP1-049.135	***Scoping of projects due to data availability*** The CEA methodology is provided in F1.5 EIA Methodology [APP-052]. Figure 5.3 of that document sets out that some projects were scoped out of the CEA due to a lack of data. This is reflected in F5.5.1 Cumulative effects screening matrix [APP-084]. The	The Mona Offshore Wind Project is being developed within a period of rapid growth in the offshore wind sector. This rapid development includes development of other Offshore Wind Leasing Round 4, ScotWind and Marine Area Consent regime in Ireland. As such, the approach to CEA has, over recent years, become an issue of increasing importance for offshore wind developers. In response, RenewableUK and the Natural Environment Research Council (NERC) have published guidelines on the undertaking of the

Reference	Written Submission Comment	Applicant's response
	Councils note that this approach is justified in document F1.5 [APP-052] with reference to Guiding Principle 7 of RenewableUK 'Cumulative Impact Assessment Guidelines: Guiding Principles for Cumulative Impacts Assessment in Offshore Wind Farms' (June 2013)[51]. The Councils consider an extract of Guiding Principle 7 below to be of relevance: *"For an assessment to be meaningful it has to be based on evidence. Where there is insufficient evidence this will necessarily preclude a meaningful quantitative assessment, as it is not appropriate for developers to make assumptions about the detail of future projects in such circumstances. However, Applicants should make some attempt to address cumulative impacts (even if only qualitatively) even when information and data may be missing or sparse, or when it is difficult to analyse the impacts of future actions. When information is missing, sparse or unavailable, it is important to ensure that the situation and rationale for assessment conclusions are adequately documented."* The Councils query whether there is sufficient justification in F5.5.1 Cumulative effects screening matrix [APP-084] for those developments that have been screened out on the basis of a lack of data. In accordance with Guiding Principle 7, the Councils would expect that in the absence of data for a quantitative assessment, at least some attempt of qualitative assessment is undertaken and if this is also not possible, the reason for this is clearly documented. The Guidance referenced relates specifically to offshore development, whilst the Councils are primarily interested in the CEA relating to onshore elements.	cumulative effects assessment (CEA) 'Cumulative Impact Assessment Guidelines' (RenewableUK, 2013) and the Planning Inspectorate have published an advice note, 'Advice Note Seventeen: Cumulative Effects Assessment' (Planning Inspectorate, 2019c). The approach to CEA undertaken for the Mona Offshore Wind Project takes into account the principles outlined in the RenewableUK guidelines and the Planning Inspectorate Advice Note, together with comments made in response to the Mona Offshore Wind Project Scoping Report and consultation. The Applicant's approach for screening projects in/out of the cumulative effects assessment is set out in Volume 1, Chapter 5: EIA Methodology (APP-052). The process considers a number of factors including spatial overlap with the Mona Offshore Wind Project. The screening process is also undertaken on a topic-by-topic basis taking into account the information on the cumulative projects that is within the public domain at the time of the assessment. The Applicant recognises that the Guiding Principle 7 quoted is specific to offshore developments. The Applicant notes that the cumulative effects assessment follows the approach as set out in Advice Note Seventeen: Cumulative Effects Assessment' (Planning Inspectorate, 2019c) to assign the developments to tiers. This is based on the availability of detail and information necessary for the assessment and reflects a diminishing degree of certainty that can be assigned to each development. Nevertheless, where full technical data from the cumulative project is not available, the Applicant has sought to assess cumulative impacts where possible. For example, the hydrology and flood risk cumulative effects assessment has considered projects for which there is little information in the public domain. However, the assessment has assumed that flood risk from other developments will be managed to an acceptable level on the basis that a flood consequences assessment will be completed and accepted by the Lead Local Flood Authority before planning consent is granted. This can be relied on in this case because it is a requirement of the planning process for a flood assessment to be undertaken and therefore likely that suitable mitigation will be put in place through the consideration of the relevant application. However, it is not appropriate to apply such assumptions to all onshore topics and as information is necessary to undertake a meaningful cumulative effects assessment.
REP1-049.136	***Progress of scoped in projects*** Table 5.10 of F5.5.1 Cumulative effects screening matrix [APP-084] lists key projects considered in the CEA. Two of those projects are now accepted DCO applications and are in the pre-examination	The Applicant is aware of updates to the status of projects identified in the CEA and has been undertaking an ongoing review of both the status of projects identified and any new projects which have emerged since the submission of the DCO application. It is the Applicant's intention to submit information to the Examination at Deadline 3 to confirm the status of cumulative projects and whether there is any consequential effect on the CEA.

Reference	Written Submission Comment	Applicant's response
	stage; these are Morgan Offshore Wind Farm Generation Assets and Morecambe Offshore Windfarm Generation Assets. The Councils therefore expect that the CEA should be updated as necessary to take into account the availability of the full DCO application information for those applications since submission of the Mona Offshore Wind Farm DCO.	
REP1-049.137	3.10.2 Potential Effects The Councils acknowledge that the CEA concludes significant adverse cumulative effects relating to: benthic subtidal and intertidal ecology; fish and shellfish (herring and cod spawning); marine mammals (bottlenose dolphin and harbour porpoise); shipping and navigation; terrestrial designated historic assets. The Councils reiterate that the presentation of the CEA within the DCO application documents, particularly the ES, is not clear. This is reflected in the list of significant adverse effects provided in the Planning Statement [APP-186] at paragraph 1.6.4.5, in which some of the effects listed as significant adverse are then described as not being significant due to further factors. This includes the significant effects to marine mammals, which are mitigated to a non-significant level through provision of relevant management plans, and the significant effects to terrestrial designated historic assts, which are identified as being caused more by Awel y Mor Wind Farm than this proposed development. The Councils consider that such reporting is ambiguous and remains unclear on the total number of significant effects (adverse or beneficial) identified in the CEA.	The cumulative effects assessment (CEA) for the Mona Offshore Wind Project has been undertaken in accordance with the staged approach set out in section 3 of the Planning Inspectorate's advice note seventeen (Planning Inspectorate, 2019) which specifically relates to undertaking CEAs for nationally significant infrastructure projects. Each chapter of the Environmental Statement includes a summary table which confirms the summary of potential cumulative environmental effects together with any necessary mitigation and monitoring: • Table 2.37 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054); • Table 3.35 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055); • Table 4.66 of Volume 2, Chapter 4: Marine mammals (APP-056); • Table 7.41 of Volume 2, Chapter 7: Shipping and navigation APP-059; and • Table 5.18 of Volume 3, Chapter 5: Historic environment (APP-068). Each table outlined above identifies the significance of effect and the significance of the residual effect following implementation of mitigation. Paragraph 1.6.4.5 of the Planning Statement (APP-186) is intended to provide a comprehensive summary describing potentially significant cumulative adverse effects, identifying, where relevant, instances where the significance of the residual cumulative effects is expected to change as a result of mitigation. In all cases, the resultant residual cumulative effect is expected to be non-significant in environmental impact assessment terms. Whilst the Applicant acknowledges that this is not explicitly stated in each bullet point under paragraph 1.6.4.5, this overall conclusion is confirmed in paragraph 1.6.5.9 of the Planning Statement (APP-186). Upon further review, the Applicant confirms that the following text presented in the first bullet point of paragraph 1.6.4.5 was included in error.

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		"*Benthic subtidal and intertidal ecology where potentially significant effects in the short to medium term relating to temporary habitat disturbance/loss are predicted to decrease to be non-significant in the long term*" This discrepancy has been recorded in the Errata Sheet (S_PD_1 F03) submitted at Deadline 2.
REP1-049.138	Notwithstanding the point above, the Councils remain concerned regarding the potential for cumulative impacts of the Mona Offshore Wind Farm and other existing and proposed energy NSIP projects in the region, in particular. As set out in Section 3.4 of this LIR, the Councils disagree with conclusions regarding the landscape and visual impact, arguing that there would be significant adverse impact. The Councils note that the Relevant Representation by the Design Commission for Wales [RR-014] also recognises the need for 'strategic coordination', particularly around the Bodelwyddan substation and its relationship to others proposed or consented in the area. Furthermore, members of the Councils, and the residents they represent, remain concerned that the construction of multiple energy NSIPs within proximity to one another could result in adverse impacts and disruption to the local community, particularly in relation to highways and construction traffic. The Councils highlight that whilst a temporal construction period overlap with screened in projects has been identified in the F5.5.1 Cumulative effects screening matrix [APP-084], the data confidence for these entries varies from low to high, and this may not accurately reflect the current programme for those projects assessed.	The Applicant notes that the methodology used to undertake the cumulative landscape and visual impact assessment has been developed in accordance with best practice guidance including GLVIA3 as detailed in responses above. The Applicant refers to its response to REP1-049.19 regarding cumulative landscape and visual effects. The Applicant notes the concerns regarding the potential cumulative impacts arising from the construction of the other energy infrastructure projects. The construction traffic from other committed developments (i.e. developments that have been through the planning process and have planning consent but are not yet generating traffic) have been taken into account in the calculation of future baseline traffic flows. Following this rationale, Awel y Môr should be assessed as part of the committed developments, however due to the close proximity of Awel y Môr to the Mona Offshore Wind Project and the use of routes the same as Mona Offshore Wind Farm this project has been considered alongside the other cumulative developments to ensure a robust development (see section 8.10 of Volume 3, Chapter 8: Traffic and Transport (APP-071)). The cumulative projects considered for traffic have been assessed as one cumulative impact rather than separate projects as this represents the maximum design scenario. The cumulative effects assessment on traffic receptors (as reported in Volume 3, Chapter 8: Traffic and Transport (APP-071)) concluded negligible adverse effects. Potential cumulative impacts with regards to human health (including impacts on community identity and culture) are assessed in Volume 4, Chapter 4: Human Health (APP-078). The chapter has also considered potential cumulative impacts that may cause disturbance, such as noise and vibration. The Applicant notes that it will adopt a proactive approach to consultation (including with the local community) as set out in the Outline Communications Plan (Document Reference J26.4 F02).
REP1-049.139	The Councils remain concerned that whilst the assessment provides a conclusion at a single point in time, based on the information available at that time, the reality at point of construction may be very different e.g. if projects have become delayed, or undergo design changes. The Councils recognise that such	The Applicant notes that many applications submitted for planning consent do not include detailed construction programmes and updates to construction programmes are rarely submitted into the public domain. To allow for flexibility within the cumulative effects assessment, the Applicant has assumed a maximum deign scenario that the construction programme of the Mona Offshore Wind Project will overlap with the construction programme of cumulative projects screened into the assessment (see Volume 5, Annex

Reference	Written Submission Comment	Applicant's response
	scenarios cannot be predicted or assessed at this stage, however remain concerned that there is insufficient flexibility or provision in the DCO to deal with such issues should they arise. The Councils make suggestions to help address these concerns below and welcome further discussion accordingly.	5.1 Cumulative Effects Screening Matrix (APP-084)). Management measures to control construction impacts are based on the maximum design scenario. These measures are set out in a series of outline management plans which will be subject to approval by the relevant planning authority. The list of management plans and how they are secured through the DCO are provided in the Mitigation and Monitoring Schedule (Document Reference J10 F02)).
REP1-049.140	3.10.3 Mitigation / Management Proposals The Councils consider that the potential for cumulative impacts should be monitored post-consent, with appropriate mechanisms to ensure that should other projects come forward at the same time as Mona Offshore Wind Farm, the Applicant is required to proactively work with other developers and the Councils to minimise adverse impacts on the environment and residents. This would provide some reassurance that any changes to both this project and others scoped into the CEA are monitored and taken into account post-consent, recognising that the assessment provided with the DCO is necessarily based on a single point of time. The Councils consider that this approach would recognise the very real possibility that other major projects in the vicinity could be delayed or undergo changes which subsequently do introduce the potential for more cumulative effects. The Council suggest that such provision could be secured through the DCO via mechanisms such as:	The Applicant is committed to working proactively with developers of the other energy infrastructure projects to minimise impacts on residents and the environment. The Applicant notes that the key mechanism for managing potential cumulative impacts during construction of the Mona Offshore Wind Project will be through the Code of Construction Practice (APP-212) and the series of management plans, which are secured as a requirement of the DCO. The final CoCP and management plans will be agreed with the relevant planning authority post consent prior to commencement of construction and will consider where necessary, any updates to the measures in light of changes to the design and programme of cumulative projects. The implementation of the measures within the management plans may be monitored, however it is not usual practice for the CEA to be monitored. The cumulative effects assessment for the Mona Offshore Wind Project is based on the maximum design scenario e.g. an overlap of construction programmes. This allows flexibility within the cumulative assessment. The Applicant does not envisage any new cumulative effects will arise.
REP1-049.141	a) Amending the wording of Requirement 4 of the draft DCO to include that any information regarding staging of construction also confirms the current understanding of other major projects under construction during the same programme period, and provides details as to how this will be managed.	The Applicant refers to the Appendix to Response to Hearing Action Points: Indicative Staging Plan F01 (REP1-014). As described within that document, information submitted under Requirement 4 of the draft development consent order (C1 F04) (Draft DCO) will be with reference to the Work Nos. as described within Schedule 1 of the Draft DCO. The Applicant is in discussion with other projects as necessary through the Examination, in particular National Grid Electricity Transmission and Awel y Mor Offshore Wind Farm, in particular through negotiations of bespoke protective provisions and will continue to communicate with those entities. However, it is not appropriate for the undertaker to provide information regarding other major projects in the vicinity of the Project to the relevant planning authorities at the time of discharging Requirement 4. It is not for the

Reference	Written Submission Comment	Applicant's response
		undertaker to speak for other projects and details of those projects will not necessarily be within the undertaker's knowledge.
REP1-049.142	b) A commitment secured through the Code of Construction Practice and other management plans, such as the Construction Traffic Management Plan, to proactively work with other developers prior to and during construction to identify and reduce any potential adverse impacts of works taking place in parallel. This could include a dedicated role within the construction team as a point of liaison, or the formulation of a developer liaison group, to work collaboratively with each other and the Councils to seek to reduce adverse impacts on the community and environment. The Councils would be supportive of relevant teams (e.g. Highways) having an active role within any future liaison.	The Applicant notes that the roles of the construction team are set out in the Outline CoCP (APP-212) and the associated management plans. The Outline Communications Plan (APP-216) includes a role for a liaison officer. Whilst this liaison will primarily be with stakeholders and residents, it will also include liaison with other developers. The Outline Construction Traffic Management Plan (APP-225) includes a role with the Highways Authorities which will also include liaison with other developers. The scope of these construction team roles will be further defined in the final CoCP and management plans and agreed with the relevant local authority as secured by requirement 9 of the draft DCO.
REP1-049.143	c) Secure the provision of appropriate landscape and visual mitigation as suggested in Section 3.3 of this LIR, for example through on-site mitigation or off-site enhancement measures.	Please see Rows REP1-049.22 to REP1-049.24.
REP1-049.144	3.10.4 Summary The Councils consider that the CEA provided in the DCO application is not particularly clearly reported and it is difficult to be certain of its overall conclusions with regard to significant effects (both adverse and beneficial). The Councils also consider that some clarification could be provided as to the screening out of some projects on data grounds, and the changes to two key projects since DCO submission. Whilst it is acknowledged that the CEA reports only limited significant adverse cumulative effects, the Councils remain concerned about the potential impacts on the community and environment of many significant energy projects occurring in close proximity and similar timeframes, as well as wider development. In particular, the Councils retain concerns regarding landscape, in	The Applicant's responses are provided above. The Applicant has provided a summary of the overall cumulative effects assessment in the Planning Statement (APP-186). Clarification on the screening of projects in/out of the cumulative effects assessment is provided in the response to REP1-049.137 to REP1-049.139. The cumulative effects assessment is based on the maximum design scenario. The Applicant confirms that the parameters of the cumulative effects assessment will not change prior to change prior to construction.

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	which the Councils do not agree with the conclusions of the CEA, and around highways and construction effects. The Councils are concerned that the parameters of the CEA assessment could change prior to construction, given that it is an assessment undertaken at a point of time and with best available knowledge, and that there are not sufficient mechanisms in the DCO to manage cumulative impacts should they occur. The Councils have suggested some mechanisms that could be adopted to provide greater confidence that concerns of cumulative effects would be considered on an ongoing basis post-consent, including through construction and detailed design.	
REP1-049.145	4. Comments on the draft Development Consent Order 4.1 Introduction This section of the LIR specifically considers the drafting of the DCO including the potential impact of the proposed articles and Requirements in the draft Order, and the DCO obligations and their potential impact on the local authorities' areas52. This is presented in a tabular format in relation to each relevant article or requirement of the DCO that the Councils' wish to comment on at this time. The comments are based on the latest version of the draft DCO submitted at Procedural Deadline A on 28 June 2024 [PDA-003/4].	The Applicant notes the response.
REP1-049.146	Part 1, Article 2 Interpretation "onshore site preparation works" means operations consisting of site clearance, demolition, early planting of landscaping works, archaeological investigations, environmental surveys, ecological mitigation, investigations for the purpose of assessing groundconditions, remedial work in respect of any contamination or other adverse ground conditions, the diversion and laying of utilities and services, site security works, the erection of any temporary means of enclosure, the erection of temporary hard standing, the erection of welfare facilities, creation of site accesses	Requirement 10 of the draft DCO provides that no new permanent means of access to a highway or any permanent alteration to an existing means of access to a highway may be formed until approval has been given by the relevant planning authority (in consultation with the relevant highway authority) in relation to the detailed design, layout and siting of that access. The access must then be constructed in accordance with the approved details. This requirement does not use the term "commence" or "commencement" as it does not extend beyond the highway accesses and is drafted to facilitate the necessary approval of these works separately to allow their use to facilitate construction works. This requirement may be triggered in relation to the onshore site preparation works, which include the

Reference	Written Submission Comment	Applicant's response
	and the temporary display of site notices or advertisements. It is unclear what is meant by 'creation of site accesses' in the definition of works excluded from commencement and defined as 'onshore site preparation works'. The Councils seek clarity as to whether this includes accesses from a highway, and relates to temporary access only, given that there is a separate requirement under Schedule 2, Requirement 10 relating to permanent access to a highway. Requirement 10 requires that details are approved prior to commencement, which is at odds with the potential scope of the definition of 'onshore site preparation works' and their exclusion from commencement.	creation of site accesses, where such accesses would involve the creation of a permanent new access or permanent alterations to an existing access. Such works would not constitute commencement of works for the purposes of many of the other DCO requirements but the wording of Requirement 10 is such that it allows the relevant planning authority to approve the detailed design of site accesses where they are permanent in nature.
REP1-049.147	Schedule 2, Requirement 4 'Stages of authorised project' 4.—(1) The onshore works may not be commenced until notification has been submitted to the relevant planning authority detailing whether the onshore works will be constructed: (a) in a single stage; or (b) in two or more stages. (2) The onshore works may not be commenced until details of the stages of the onshore works have been submitted to and approved by the relevant planning authority and the construction of the onshore works must be in accordance with the approved details. It's unclear what is meant by 'details of the stages' in paragraph (2). The Councils seek clarity as to whether the Applicant is required to provide a timescale/ programme for the implementation of each stage or whether the scope of this requirement is limited to providing a sequence for the phasing of the development. This could, and should, also include for details of the spatial extent of each stage of works. The Councils request that the Requirement wording provides a clearer scope of the details to be submitted	The Applicant refers to the Appendix to Response to Hearing Action Points: Indicative Staging Plan F01 (REP1-014). As described within that document, information submitted under Requirement 4 of the draft development consent order (C1 F04) (Draft DCO) will be with reference to the Work Nos. as described within Schedule 1 of the Draft DCO. The Councils will be able to determine the spatial extent of each stage with reference to the Works plans (onshore) (AS-003).

Reference	Written Submission Comment	Applicant's response
	and approved and consider that a more detailed works plan / programme would be useful, whether for a single stage or multiple stages.	
REP1-049.148	Schedule 2, Requirement 6 '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; (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. CBCC has previously raised concern regarding the works proposed around the Llanddulas Beach waste disposal area, and the potential for installation of cables at this point of landfall to undermine the rock armour protecting the site. Elected Members highlight issues of erosion in this area and the presence of limestone, which must be taken into consideration in the detailed design of the cabling and the construction method. CBCC therefore request that the detailed design requirement specifically requires the details of the offshore export cables at landfall, and onshore export	The draft development consent order (C1 F04) (Draft DCO) contains in Requirement 9, Schedule 2 an obligation to submit a code of construction practice to the relevant planning authority prior to commencing a stage of the onshore works. This includes, as described in Requirement 9(2)(r) a landfall construction method statement and means a final landfall construction method statement will be prepared in accordance with the outline landfall construction method statement (J26.14 F02). This commitment to submit detailed designs for the landfall construction is already secured in the Draft DCO. The Draft DCO contains in Requirement 5, Schedule 2 an obligation to submit details of the onshore substation in accordance with the design principles. The design principles (Document Reference J3 F02) states that the Applicant will engage with DCC, and the Design Commission for Wales on the emerging design to inform the development of the design guide. The Applicant is therefore committed to engaging with the Design Commission for Wales at the detailed design stage already and the commitment is secured through Requirement 5 as part of the design principles.

Reference	Written Submission Comment	Applicant's response
	cables and their installation (e.g. a Construction Method Statement), to be submitted and approved prior to commencement. The Councils recognise the involvement of the Design Commission for Wales [RR-014] and consider that this has been valuable to ensuring a high-quality development and promoting the need for strategic coordination with other projects. The Councils consider that a commitment should be secured in the DCO to the Applicant continuing to engage with the Design Commission for Wales at detailed design stage.	
REP1-049.149	Schedule 2, Requirement 7 '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 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. (3) The landscape plan must be implemented as approved. As identified in sections 3.3 and 3.4 of this LIR, the Councils consider that the Requirements relating to landscape and ecological managementare not sufficiently detailed. Revised proposed Requirements are provided in section 3.3.7.	Please see Rows REP1-049.22 to REP1-049.25. The Applicant considers the drafting of Requirement 7 (as updated – see Schedule 2 of the draft development consent order (Document Reference C1 F04)) is appropriate and no further changes are proposed.
REP1-049.150	Schedule 2, Requirement 8 'Implementation and maintenance of landscaping' 8.—(1) All landscaping works must be carried out in accordance with the landscaping schemes approved under requirement 7 (provision of landscaping). (2) Any tree or shrub planted as part of an approved landscaping scheme that, within a period of five years	Please see Row REP1-049.22 to REP1-049.25. The Applicant considers the drafting of Requirement 8 (see Schedule 2 of the draft development consent order (Document Reference C1 F04)) is appropriate and no further changes are proposed.

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	after planting, is removed, dies or becomes, in the opinion of the relevant planning authority, seriously damaged or diseased must be replaced in the first available planting season with a specimen of the same species and size as that originally planted unless a different species is otherwise agreed with the relevant planning authority. As identified in sections 3.3 and 3.4 of this LIR, the Councils consider that the Requirements relating to landscape and ecological management are not sufficiently detailed. Revised proposed Requirements are provided in section 3.3.7.	
REP1-049.151	Schedule 2, Requirement 10 'Highway accesses' Highway accesses 10.—(1) No new permanent means of access to a highway to be used by vehicular traffic, or any permanent alteration to an existing means of access to a highway used by vehicular traffic may be formed until written details of the design, layout and sitting of that new or altered access have been submitted to and approved by the relevant planning authority in consultation with the relevant highway authority. (2) The highway accesses must be constructed in accordance with the approved details. Comments in respect of the definition of pre-commencement works are provided earlier in the table. In addition to those comments, CBCC consider that Requirement 10 should ensure that the details of the visibility splays are included and that they are maintained thereafter in perpetuity.	Details of visibility splays will be included within the details of 'design, layout and siting' submitted to the relevant planning authority for approval as described in Requirement 10 of the draft development consent order (C1 F04).
REP1-049.152	Schedule 2, Requirement 12 'Landscape and ecology management plan' 12.—(1) No stage of the onshore works may commence until for that stage a landscape and ecology management plan in accordance with the outline landscape and ecology management plan as appropriate for the	Please see Row REP1-049.22 to REP1-049.25. The Applicant considers the drafting of Requirement 12 (see Schedule 2 of the draft development consent order (Document Reference C1 F04)) is appropriate and no further changes are proposed.

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	relevant stage has, following consultation with NRW, been submitted to and approved by the relevant planning authority. (2) The landscape and ecology management plan(s) submitted under sub-paragraph (1) must include an implementation timetable and must be implemented as approved. As identified in sections 3.3 and 3.4 of this LIR, the Councils consider that the Requirements relating to landscape and ecological management are not sufficiently detailed. Revised proposed Requirements are provided in section 3.3.7.	
REP1-049.153	Schedule 2, Requirement 14 'Construction hours' 1) Except as otherwise agreed in the code of construction practice and subject to subparagraphs (2) to (4), construction of the onshore works and traffic movements arriving or departing from the site of the relevant work may take place only between the hours of 0700 and 1900 from Monday to Saturday, with no activity on Sundays or bank holidays. (2) Subject to paragraph (3), construction of the onshore works and construction-related traffic movements arriving or departing from the site of the relevant work may take place outside the hours specified in subparagraph (1) for certain identified works including— (a) where continuous periods of construction are required, for works such as concrete pouring and finishing, electrical circuit pulling and jointing and testing, trenchless installation techniques, and dewatering pumps; (b) for the delivery and unloading of abnormal loads; (c) for the landfall works; (d) for any other time-critical element of the onshore works; and (e) emergency works. (3) Except as provided in sub-paragraph (4) and in relation to emergency works, all construction works which are to be undertaken outside the hours specified in sub-paragraph (1) must be agreed by giving at least 48 hours' notice in advance of the works to the relevant planning authority. (4) In respect of trenchless	This is noted, however, the Applicant does not consider the proposed construction hours to be unreasonable and notes that these are in line with typical working hours employed by the construction industry. As indicated, this period was considered suitable for the Awel y Mor Offshore Wind Farm Order 2023 and given the similarities in the location of the onshore substations for both projects, the Applicant does not consider it would be appropriate to deviate from that position. The Applicant has updated the drafting of Requirement 14, Schedule 2 of the draft development consent order (C1 F04) to clarify that there will be no heavy goods vehicle movements outside of the identified construction hours. These will not form part of the activities to take place during the mobilisation period described in the outline code of construction practice (Document reference J26 F02). See also row REP1-049.20 in relation to the lighting and visual assessment.

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	installation techniques, where continuous 24-hour working is required and has been assessed in the environmental statement, the undertaker must notify the relevant planning authority in advance of such works. (5) In the event of an emergency, notification of that emergency must be given to the relevant planning authority and the relevant highway authority as soon as reasonably practicable. (6) For the purposes of this requirement "emergency" means a situation where, if the relevant action is not taken, there will be adverse health, safety, security or environmental consequences that in the reasonable opinion of the undertaker would outweigh the adverse effects to the public (whether individuals, classes or generally as the case may be) of taking that action. Both Councils raised concerns regarding working hours in their response to statutory consultation. The Councils remain of the view that the proposed working hours are too broad and could give to concerns regarding impacts on the amenity of residents and caravan site occupiers. The Code of Construction Practice allows for 'mobilisation' one hour either side of these core working hours, making them effectively 0600 to 2000. Whilst HGVs are specified as excluded, it is considered that the broad nature of works that are defined as mobilisation could give rise tosubstantial disturbance to residents, particularly in combination, and would be difficult to enforce or monitor regarding compliance. The proposed working hours are also incompatible with statements made in the Environmental Statement regarding lighting and visual assessment, as identified in Section 3.3 of this report, and are of further concern given errors in the construction noise assessment identified in section 3.7 of this report. It is requested that the hours in paragraph (1) be modified to 0800 to 1800 from Monday to Friday, from 0800 to 1300 on Saturday and with no activity on Sunday or bank holidays. The Councils recognise that the Awel Y Mor	

Reference	Written Submission Comment	Applicant's response
	Offshore Wind DCO scheme was consented with the working hours proposed by the Applicant, however there is significant concern regarding the potential cumulative impacts of more than one DCO scheme within the same locality working to hours that exceed those usually applied through the Councils standard planning conditions.	
REP1-049.154	Schedule 2, Requirement 15 'Restoration of land used temporarily for construction' 15. Any land landward of MLWS which is used temporarily for construction of the onshore works and not ultimately incorporated in permanent works or approved landscaping or ecological works must be reinstated within 12 months of completion of the relevant stage of the onshore works in accordance with such details as have been submitted to and approved by the relevant planning authority. The requirement does not provide a timescale for the submission and approval of the reinstatement works. CBCC consider that details of the reinstatement works must be submitted to and approved by the relevant planning authority prior to the commencement of the relevant works. As reflected in its response to statutory consultation, DCC consider that Requirement 15 should include a clause which requires land condition to be recorded prior to commencement of development, and land to be restored to same or better standard than original.	The draft development consent order (Document Reference C1 F04) (Draft DCO) contains in Requirement 9, Schedule 2 an obligation to submit a code of construction practice to the relevant planning authority prior to commencing a stage of the onshore works. This includes, as described in Requirement 9(2)(k) a soil management plan and means a final soil management plan will be prepared in accordance with the outline soil management plan (Document Reference J26.8). This commitment to submit details of soil management prior to commencement of construction will allow the relevant local authority to give their approval to the undertaker's approach prior to construction. Following completion of construction Article 29 (Temporary use of land for carrying out the authorised project) of the Draft DCO requires the undertaker to return the land to the possession of the landowner after a one year period during which the temporary works are removed and the land restored to the reasonable satisfaction of the owners of the land. The land will therefore be restored in line with the agreement of the landowner. Should the landowner wish for the land not to be restored, for example if there is an improved access that has been constructed which the landowner wishes to retain, then Requirement 15, Schedule 2 of the Draft DCO would oblige the undertaker to seek approval to do so from the relevant planning authority. It would therefore not be appropriate to include a specific period in which the obligation to seek approval from the relevant planning authority will be sought because this Requirement will apply on a case-by-case basis.
REP1-049.155	Schedule 2, Requirement 15 'Control of operational artificial light emissions' 16.—(1) Work No. 22a must not be brought into operation until a written scheme for the management and mitigation of internal and external artificial light emissions from Work No. 22a has been submitted to and approved by the relevant planning authority. (2) The approved scheme for the management and mitigation of artificial light emissions must be	See row REP1-049.20.

Reference	Written Submission Comment	Applicant's response
	implemented and maintained during the lifetime of Work No. 22a. The Councils highlight that this Requirement relates to lighting, the visual impact of which has not been sufficiently assessed in the DCO application, as identified in Section 3.3 of this report.	
REP1-049.156	Schedule 12 'Approval of matters specified in requirements' Part 4 'Further information' 4.—(1) Where an application has been made under paragraph 1 the relevant planning authority has the right to request such reasonable further information from the undertaker as is necessary to enable it to consider the application. (2) If the relevant discharging authority considers further information is needed, and the requirement does not specify that consultation with a requirement consultee is required, it must, within 10 days of receipt of the application, notify the undertaker in writing specifying the further information required. (3) If the requirement indicates that consultation must take place with a consultee the relevant planning authority must issue the consultation to the requirement consultee within five working days of receipt of the application. Where the consultee requires further information they must notify the relevant discharging authority in writing specifying the further information required within 10 days of receipt of the consultation. The relevant discharging authority must notify the undertaker in writing specifying any further information requested by the consultee within five working days of receipt of such a request. (4) In the event that the relevant discharging authority does not give such notification as specified in subparagraph (2) or (3) it is deemed to have sufficient information to consider the application and is not thereafter entitled to request further information without the prior agreement of the undertaker.	The Applicant has updated the drafting of Schedule 12 to ensure there is consistent use of terms. However, the Applicant does not consider it necessary to extend the period in paragraph 4(2) within which the Councils can request additional information from the undertaker. It will be important for discharges of requirements and other approvals from the Councils to be timely in order to avoid delays to the construction programme. It is within the Applicant's interest to provide all the relevant information to the Councils when discharging requirements and this provision should be considered a fall back only.

Reference	Written Submission Comment	Applicant's response
	The Councils consider that 10 days is an insufficient period of time to request further information, and request that this is amended to 15 working days. The Councils note that Schedule 12 uses the terms 'weeks', 'days' and 'working days' which is ambiguous and inconsistent. The Councils recommend that 'working days' is used throughout Schedule 12 to ensure a simplified and consistent approach. The Councils highlight more broadly a concern regarding the potential burden of work presented through the discharge of requirements process, particularly given the timescales proposed and the level of specialist advice likely to be required to review and determine technical detailed design. The Councils would welcome a discussion with the Applicant regarding potential mechanisms to support the Councils in managing the discharge of requirements, for example through the use of planning performance agreements (PPA) or similar.	
REP1-049.157	Streetworks Part 3, Article 10 Temporary stopping up of public rights of way, Part 3, Article 13 The undertaker may, for the purposes of the authorised project, enter on so much of any of the streets specified in Schedule 3 (streets subject to street works) as is within the Order limits and may— (a) break up or open the street, or any sewer, drain or tunnel within or under it; (b) tunnel or bore under the street; (c) remove or use all earth and materials in on or under the street; (d) place and keep apparatus within or under the street; (e) maintain apparatus within or under the street or change its position; and (f) execute any works required for or incidental to any works referred to in sub-paragraphs (a) to (e). (2) The authority given by paragraph (1) is a statutory right for the purposes of sections 48(3) (streets, street works and undertakers) and 51(1) (prohibition of unauthorised street works) of the 1991 Act(c). Temporary stopping up of public rights of way 13.—(1) The undertaker may in connection with the carrying out of the authorised project, temporarily stop	The draft development consent order (C1 F04) (Draft DCO) contains in Requirement 9, Schedule 2 an obligation to submit a code of construction practice to the relevant planning authority prior to commencing a stage of the onshore works. This includes, as described in Requirement 9(2)(p) a public rights of way management strategy and means a final public rights of way management strategy will be prepared in accordance with the outline public rights of way management strategy (J26.17 F02). This includes details of various measures in relation to those PRoWs and their reinstatement following completion of the works. The outline public rights of way management strategy (APP-229) has been updated to confirm that rights of way to be brought back into use as soon as practical to do so.

Reference	Written Submission Comment	Applicant's response
	up, restrict or divert each of the public rights of way specified in column (1) of Schedule 5 (public rights of way to be temporarily stopped up or restricted) to the extent specified in column (2), by reference to the numbers and letters shown on the temporary stopping of public rights of way plan. (2) The public rights of way specified in Schedule 5 (public rights of way to be temporarily stopped up or restricted) may not be temporarily stopped up, restricted or diverted under this article unless a diversion for the stopped up section of that right of way, is first provided by the undertaker to the standard defined in the public rights of way management strategy forming part of the code of construction practice to be approved in accordance with the requirements set out in Schedule 2, to the reasonable satisfaction of the relevant planning authority. (3) The relevant diversion route provided under paragraph (2) will be subsequently maintained by the undertaker until the re-opening of the relevant right of way specified in paragraph (1). DCC raised concerns in relation to streetworks powers and potential effects on Public Rights of Way within their S42 response. It is acknowledged that the streetworks powers proposed within the draft DCO are fairly extensive but not uncommon for projects of this nature. The Councils remain concerned about potential effects on the PRoW network within this area of Denbighshire but acknowledge that any effects are proposed to be temporary in nature. The Council would like a commitment for detailed engagement on PRoW measures and the final Rights of Way Management Plan and would like this plan to include a commitment to require rights of way to be brought back into use as soon as practical to do so.	
REP1-049.158	5. Summary and conclusions As stated in Chapter 3 of this LIR, the Councils support	The Applicant has responded to the detailed points above and therefore has not responded to the individual key actions provided in the Local Impact Report summary.

Reference	Written Submission Comment	Applicant's response
	the principle of development of the Mona Offshore Wind Farm. However, as raised throughout this LIR, the Councils' appraisal of the DCO application in relation to particular topics of focus has identified a number of concerns that they believe should be addressed by the Applicant, via provision of clarifications; provision of further assessment; or via commitments secured in the DCO. These key actions are summarised to aid the ExA and the Applicant, below:	
Heneb Written Representation as an Appendix to CBCC/DCC Written Representation REP1-049.159	This letter sets out Heneb's advice to the local authorities as your archaeological advisor, to contribute to the Local Impact Report, which we understand is being prepared on your behalf by Arup. Should it be required by the Examination, this can also be taken to constitute Heneb's Written Representation for Deadline 1 of the Examination. It encompasses advice for both the Gwynedd and Clwyd-Powys areas. In our Relevant Representation (4th May 2024), we set out the following as points on which we may wish to comment, in relation to Onshore Archaeology and Heritage: • the scope and adequacy of archaeological assessment and evaluation • the assessment of impacts presented in the Environmental Statement • the suitability of proposed further investigation, mitigation and/or enhancement measures, including the draft Outline Onshore Written Scheme of Investigations • the suggested wording for proposed conditions or other means of securing such works • the content of the OLEMP, OCoCP and other scheme documents as they pertain to archaeology	The Applicant welcomes the Written Representation from Heneb, and the ongoing engagement, and responds to matters below.
REP1-049.160	All aspects of the Environmental Statement and supporting documents pertaining to Onshore Archaeology and Cultural Heritage have been agreed and a Statement of Common Ground has been agreed	The Applicant notes the Written Representation and can confirm that the programme of trial trenching is targeted to be completed in September 2024 (under the assumption that access can be obtained, and weather conditions are favourable).

Reference	Written Submission Comment	Applicant's response
	between Heneb and the Applicant. This includes acknowledgement that the trial trenching programme, which forms part of the baseline evidence, has not yet been completed, due to access and weather constraints. This work is due to take place in September, in the area of the proposed onshore substation. As this is a key location within the scheme, significant archaeological discovery could pose a concern, however evidence to date indicates this risk is low. This is based primarily on the geophysical survey of this area, which has been shown by the completed trial trenching to be reliable within the usual constraints of technique and location. The outcome of the remaining trenching is therefore expected not to affect the ES conclusions.	
REP1-049.161	As is relatively common for major infrastructure applications, the exact scope of mitigation will be agreed post-consent. The Outline Onshore Written Scheme of Investigations will need to be updated to reflect the forthcoming trial trenching results and the recent changes associated with the changes to the former Welsh Archaeological Trusts, as well as to respond to comments we have provided on the proposed mitigation methodology. The Statement of Common Ground between Heneb and the Applicant confirms that the Onshore WSI will be updated upon completion of the trial trenching.	The Outline Onshore Written Scheme of Investigation (APP-209) will be updated following completion of the programme of trial trenching.
REP1-049.162	The Draft DCO includes provision to secure implementation of the archaeological mitigation programme (Schedule 2 Requirements: Onshore Archaeology, Item 11(1) to 11(3)). The draft wording appears suitable; we would note that, if it is not to be specifically stated in the wording of the Order, it is essential that the written schemes of investigation include completion of the post -field programme and a timetable for completion. We would also note that in our discussions with the Applicant team, we have recommended cross-referencing as appropriate	The Applicant notes the Written Representation and can confirm that these points will be addressed through the submission of a revised Outline Onshore Written Scheme of Investigation (APP-209) at a suitable Deadline.

Reference	Written Submission Comment	Applicant's response
	between the Outline Onshore WSI and the Outline Code of Construction Practice and Outline Landscape and Environmental Management Plan, since there will be localised interaction between the activities covered in these documents.	
REP1-049.163	The Environmental Statement (Vol.3, Ch.5, 5.10.4.1) confirms that a listed building consent application will be submitted for the alteration to the Grade II listed Gwrych Estate Boundary Wall (ref. 19044) for construction access. We will advise on this through the normal planning process.	The Applicant can confirm that a Listed Building Consent application was submitted to CBCC's Conservation officer on Monday 5th August 2024. The reference number is PP-13228145. The application has been validated by CCBC and the Applicant is continuing to engage with the CCBC Conservation officer in this matter. The Applicant notes that the CCBC Conservation Officer is generally supportive of the proposed works and has had no objections in principle from Heneb.
REP1-049.164	For information, we have also been consulted on the marine licence application for the transmission assets for the scheme (ORML2429T). Beyond the intertidal zone, these works are outside our remit; since trenchless construction is intended for the intertidal zone, we do not anticipate any significant concerns for onshore archaeology from these works.	The Applicant notes the response.

2 ANNEX 1 – LANDSCAPE AND VISUAL RESOURCES SUMMARY TABLE

2.1 Introduction

2.1.1 This document has been prepared in response to the Conwy County Borough Council (CCBC) and Denbighshire County Council's (DCC) Local Impact Report (LIR) which was submitted to the Examination of the Mona Offshore Wind Farm Project at Deadline 1 (REP1-049).

2.1.2 This document is an Appendix to the Applicant's response to the LIR which is submitted at Deadline 2 (S_D2_5).

2.1.3 The LIR states at section 3.3.4 that:

3.3.4 Potential Effects

It should be noted that this review has not included reference to the summary assessment results presented in Table 6.24: Summary of potential landscape and visual effects, mitigation and monitoring. This is because the Councils consider there are too many errors or inconsistencies in this table, when reviewed alongside the more detailed narrative parts of the assessment.

For example, for representative viewpoint 2, construction and demolition effects are recorded as 'moderate to major' adverse (not significant) and several effects on LANDMAP Aspect Areas are

recorded as 'moderate' or 'minor' adverse (significant) as well as 'moderate 'or 'minor' adverse (not significant).

For the benefit of the reader and ExA, the Applicant should review and update this summary table to correct inconsistencies.

2.2 Response

2.2.1 The Applicant has reviewed Table 6.24 and Table 6.25 of Volume 3, Chapter 6: Landscape and visual resources (APP-069) against the assessment of significant effects and the cumulative effects assessment (as reported in section 6.9 and section 6.14) of Volume 3, Chapter 6: Landscape and visual resources (APP-069). The Applicant confirms that assessment conclusions in section 6.9 and section 6.14 are correct and remain unchanged. Where inconsistencies have been identified in Tables 6.24 and Table 6.25 these have been amended in the tables within this document.

2.2.2 Table 1.1 and Table 1.2 in this document supersede Table 6.24 and Table 6.25 in Volume 3, Chapter 6: Landscape and visual resources (APP-069).

Table 2.1: Summary of potential landscape and visual effects, mitigation and monitoring.

[a] C=construction, O=operations and maintenance, D=decommissioning

Description of impact	Phase[a]			Measures adopted as part of the project	Magnitude of impact	Sensitivity of the receptor	Significance of effect	Further mitigation	Residual effect	Proposed monitoring
	C	O	D							
Assessment of effects on the special qualities of national landscape designations										
Special qualities of the Clwydian Range and Dee Valley NL	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: High (very high for Offa's Dyke Path) O: High (very high for Offa's Dyke path) D: High (very high for Offa's Dyke path)	C: negligible to minor adverse (not significant) and Minor adverse for Offa's Dyke Path O: negligible to minor adverse (not significant) and Minor adverse for Offa's Dyke Path D: negligible to minor adverse (not significant) and Minor adverse for Offa's Dyke Path	None	C: negligible to minor adverse (not significant) and Minor adverse for Offa's Dyke Path O: negligible to minor adverse (not significant) and Minor adverse for Offa's Dyke Path D: negligible to minor adverse (not significant) and Minor adverse for Offa's Dyke Path	A LEMP will be a requirement of the DCO.
Landscape setting of the Clwydian Range and Dee Valley NL	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Small O: Small D: Small	C: Medium O: Medium D: Medium	C: minor adverse (not significant) O: minor adverse year 15 (not significant) D: negligible adverse (not significant)	None	C: minor adverse (not significant) O: minor adverse year 15 (not significant)	A LEMP will be a requirement of the DCO.

									D: negligible adverse (not significant)	
Rhyd y Foel to Abergele SLA and Elwy and Aled Valleys SLA	✓			Implementation measures set out in Table 6.20.	C: Medium	C: Medium	C: Moderate adverse (not significant)	None	C: Moderate adverse	A LEMP will be a requirement of the DCO.
Registered Parks and Gardens	✓			Implementation measures set out in Table 6.20.	C: Medium	C: Medium	C: Moderate adverse (not significant)	None	C: Moderate adverse	A LEMP will be a requirement of the DCO.
Assessment of effects on LANDMAP Aspect Areas										
DNBGHVS033 Cefn Estate Mosaic Rolling Lowland (Visual and Sensory) (Onshore Substation)	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Large O: Large D: Large	C: Medium O: Medium D: Medium	C: major adverse (significant) O: major adverse (significant) to moderate adverse (not significant) D: major adverse (significant)	None	C: major adverse (significant) O: major adverse (significant) to moderate adverse (not significant) D: major adverse (significant)	A LEMP will be a requirement of the DCO.
DNBGHGL031 Cefn Meiriadog Other (Geological Landscape) (Onshore Substation)	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible to small O: Small D: Negligible to small	C: Medium O: Medium D: Medium	C: moderate adverse (not significant) O: moderate adverse (not significant) D: moderate adverse (not significant)	None	C: moderate adverse (not significant) O: moderate adverse (not significant)	A LEMP will be a requirement of the DCO.

									D: moderate adverse (not significant)	
CNWVS052 Landudno to Kinmel Bay intertidal (Onshore Cable Corridor)	✓	x	✓	Implementation measures set out in Table 6.20	C: Medium D: Medium	C: Medium D: Medium	C: moderate adverse (not significant) D: moderate adverse (significant)	None	C: moderate adverse (not significant) D: moderate adverse (significant)	A LEMP will be a requirement of the DCO.
CNWVS062 Llandulas Urban Coast (Onshore Cable Corridor)	✓	x	✓	Implementation measures set out in Table 6.20	C: Small D: Small	C: Low D: Low	C: minor adverse (significant) D: minor adverse (significant)	None	C: minor adverse (significant) D: minor adverse (significant)	A LEMP will be a requirement of the DCO.
CNWVS070 Abergele Coastal Plain (western section) (Onshore Cable Corridor)	✓	x	✓	Implementation measures set out in Table 6.20	C: Large D: Large	C: Low D: Low	C: moderate adverse (significant) D: moderate adverse (significant)	None	C: moderate adverse (significant) D: moderate adverse (significant)	A LEMP will be a requirement of the DCO.
CNWVS021 Cefn yr Ogof and Environs (Onshore Cable Corridor)	✓	x	✓	Implementation measures set out in Table 6.20	C: Medium D: Medium	C: High D: High	C: major adverse (significant) D: major adverse (significant)	None	C: major adverse (significant) D: major adverse (significant)	A LEMP will be a requirement of the DCO.
CNWVS023 Dulas Lowlands (Onshore Cable Corridor)	✓	x	✓	Implementation measures set out in Table 6.20	C: Medium	C: Medium	C: moderate adverse (not significant)	None	C: moderate adverse (not significant)	A LEMP will be a requirement of the DCO.

					D: Medium	D: Medium	D: moderate adverse (significant)		D: major adverse (significant)	
DNBGHVS037 Limestone Valley-Cefn (Onshore Cable Corridor)	✓	x	✓	Implementation measures set out in Table 6.20	C: Medium D: Medium	C: Medium D: Medium	C: moderate adverse (not significant) D: moderate adverse (not significant)	None	C: moderate adverse (not significant) D: moderate adverse (not significant)	A LEMP will be a requirement of the DCO.
CNWVS070 Abergele Coastal Plain (eastern section) (Onshore Substation)	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: Low O: Low D: Low	C: negligible adverse (not significant) O: negligible adverse (not significant) D: negligible adverse (not significant)	None	C: negligible adverse (not significant) O: negligible adverse (not significant) D: negligible adverse (not significant)	A LEMP will be a requirement of the DCO.
DNBGHVS013 Coastal Fields near Towyn (Onshore Substation)	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: Low O: Low D: Low	C: negligible adverse (not significant) O: negligible adverse (not significant) D: negligible adverse (not significant)	None	C: negligible adverse (not significant) O: negligible adverse (not significant) D: negligible adverse (not significant)	A LEMP will be a requirement of the DCO.

DNBGHVS014 Area North and East of Bodelwyddan (Onshore Substation)	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible to small O: Negligible to small D: Negligible to small	C: Medium O: Medium D: Medium	C: negligible to minor adverse (not significant) O: negligible to minor adverse (not significant) D: negligible to minor adverse (not significant)	None	C: negligible to minor adverse (not significant) O: negligible to minor adverse (not significant) D: negligible to minor adverse (not significant)	A LEMP will be a requirement of the DCO.
DNBGHVS015 River Valley of Clwyd/Elwy – North of St. Asaph (Onshore Substation)	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: Low O: Low D: Low	C: negligible adverse (not significant) O: negligible adverse (not significant) D: negligible adverse (not significant)	None	C: negligible adverse (not significant) O: negligible adverse (not significant) D: negligible adverse (not significant)	A LEMP will be a requirement of the DCO.
DNBGHVS016 Vale Wooded Estate – South of Dyserth (Onshore Substation)	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: Low O: Low D: Low	C: negligible adverse (not significant) O: negligible adverse (not significant) D: negligible adverse (not significant)	None	C: negligible adverse (not significant) O: negligible adverse (not significant) D: negligible adverse (not significant)	A LEMP will be a requirement of the DCO.

DNBGHVS028 Clwydian Slopes South of Rhuallt (Onshore Substation)	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: High O: High D: High	C: minor adverse (not significant) O: minor adverse (not significant) D: minor adverse (not significant)	None	C: minor adverse (not significant) O: minor adverse (not significant) D: minor adverse (not significant)	A LEMP will be a requirement of the DCO.
DNBGHVS029 Graig Tremerchion (Onshore Substation)	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: Medium O: Medium D: Medium	C: minor adverse (not significant) O: minor adverse (not significant) D: minor adverse (not significant)	None	C: minor adverse (not significant) O: minor adverse (not significant) D: minor adverse (not significant)	A LEMP will be a requirement of the DCO.
DNBGHVS031 Vale of Clwyd – North of Denbigh (Onshore Substation)	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: Medium O: Medium D: Medium	C: minor adverse (not significant) O: minor adverse (not significant) D: minor adverse (not significant)	None	C: minor adverse (not significant) O: minor adverse (not significant) D: minor adverse (not significant)	A LEMP will be a requirement of the DCO.

DNBGHVS035 Wooded Parkland and Parkland Remnants (Onshore Substation)	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Small O: Small D: Small	C: High O: High D: High	C: moderate adverse (not significant) O: moderate adverse (not significant) D: moderate adverse (not significant)	None	C: moderate adverse (not significant) O: moderate adverse (not significant) D: moderate adverse (not significant)	A LEMP will be a requirement of the DCO.
DNBGHHL005 Bodelwyddan Park (Onshore Substation)	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Small O: Small D: Small	C: High O: High D: High	C: moderate adverse (not significant) O: moderate adverse (not significant) D: moderate adverse (not significant)	None	C: moderate adverse (not significant) O: moderate adverse (not significant), negligible to minor adverse at Year 15. D: moderate adverse (not significant)	A LEMP will be a requirement of the DCO.
Visual receptor groups – Onshore Substation										
Visual effects on people travelling along national trails/long distance paths – Wales Coast Path National Trail	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Small O: N/A D: Small	C: High O: N/A D: High	C: moderate adverse (not significant) O: N/A D: moderate adverse (not significant)	None	C: moderate adverse (not significant) O: N/A	A LEMP will be a requirement of the DCO.

									D: moderate adverse (not significant)	
Visual effects on people travelling along national trails/long distance paths – Offa's Dyke Path National Trail	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: Very high O: Very high D: Very high	C: minor adverse (not significant) O: minor adverse (not significant) D: minor adverse (not significant)	None	C: minor adverse (not significant) O: minor adverse (not significant) D: minor adverse (not significant)	A LEMP will be a requirement of the DCO.
Visual effects on people travelling along public rights of way and local roads	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Medium to Large O: Medium D: Medium to Large	C: Low (occupiers of vehicles) to high (walkers) O: Low to High D: Low to High	C: minor adverse (not significant) to major adverse (significant) O: minor to major adverse (not significant to significant) moderate adverse (not significant) at Year 15 D: minor adverse (not significant) to major adverse (significant)	None	C: minor adverse (not significant) to major adverse (significant) O: minor to major adverse (not significant to significant) moderate adverse (not significant) at Year 15 D: minor adverse (not significant) to major adverse (significant)	A LEMP will be a requirement of the DCO.

Receptors at representative viewpoint locations – Onshore Substation

Representative viewpoint 1 – View southeast along farm track from minor road to Tyddyn Meredydd (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 1 and 2).	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Large O: Medium D: Large	C: Low to medium O: Low to medium D: Low to medium	C: minor to moderate adverse (not significant) O: minor to moderate adverse (not significant) negligible to minor adverse (not significant) at Year 15 D: minor to moderate adverse (not significant)	None	C: minor to moderate adverse (not significant) O: minor to moderate adverse (not significant) negligible to minor adverse (not significant) at Year 15 D: minor to moderate adverse (not significant)	A LEMP will be a requirement of the DCO.
Representative viewpoint 2 – View north from minor road adjacent to Hendy Farm (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 3 and 4).	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Large O: Large (year 1) to Medium (year 15) D: Large	C: Medium to high O: Medium to hIgh D: Medium to high	C: moderate to major adverse (not significant to significant) O: major adverse (significant) at Year 1 to moderate adverse (not significant) at Year 15 D: moderate to major adverse (not significant to significant)	None	C: moderate to major adverse (not significant to significant) O: major adverse (significant) at Year 1 to moderate adverse (not significant) at Year 15 D: moderate to major adverse (not significant to significant)	A LEMP will be a requirement of the DCO.

Representative viewpoint 3 – View east-southeast from public footpath 105/6 to the southeast of Pentre-mawr (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 5 and 6).	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Medium O: Medium D: Medium	C: High O: High D: High	C: major adverse (significant) O: major adverse (significant) at Year 1 moderate adverse (not significant) at Year 15 D: major adverse (significant)	None	C: major adverse (significant) O: major adverse (significant) at Year 1 moderate adverse (not significant) at Year 15 D: major adverse (significant)	A LEMP will be a requirement of the DCO.
Representative viewpoint 4 – View southeast from public footpath 105/7 to the southwest of Waen-Meredydd (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 7 and 8).	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Small O: Small D: Small	C: High O: High D: High	C: minor to moderate adverse (not significant) O: minor to moderate adverse (not significant) negligible adverse (not significant) at Year 15 D: minor to moderate adverse (not significant)	None	C: minor to moderate adverse (not significant) O: minor to moderate adverse (not significant) negligible adverse (not significant) at Year 15 D: minor to moderate adverse (not significant)	A LEMP will be a requirement of the DCO.

Representative viewpoint 5 – View southeast from junction of farm track with minor road at Waen-Meredydd (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 9 and 10).	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Small O: Small D: Small	C: Medium (cyclists and equestrians) and Medium to high (walkers) O: Medium (cyclists and equestrians) and Medium to high (walkers) D: Medium (cyclists and equestrians) and Medium to high (walkers)	C: minor to moderate adverse (not significant) O: minor to moderate adverse (not significant) minor adverse (not significant) at Year 15 D: minor to moderate adverse (not significant)	None	C: minor to moderate adverse (not significant) O: minor to moderate adverse (not significant) minor adverse (not significant) at Year 15 D: minor to moderate adverse (not significant)	A LEMP will be a requirement of the DCO.
Representative viewpoint 6 – View northwest from minor road at Tyn y Ffordd Fawr (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 11 and 12).	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Small O: Small at Year 1 summer reducing to negligible D: Small	C: Medium (equestrians and cyclists) to High (walkers) O: Medium (equestrians and cyclists) to High (Walkers) D: Medium (equestrians and cyclists to High (walkers)	C: minor to moderate adverse (not significant) O: minor adverse (not significant) year 1 winter negligible adverse (not significant) at Year 1 summer D: minor to moderate adverse (not significant)	None	C: minor to moderate adverse (not significant) O minor adverse (not significant) year 1 winter. negligible adverse (not significant) at Year 1 summer D: minor to moderate adverse (not significant)	A LEMP will be a requirement of the DCO.

Representative viewpoint 7 – View southwest from public footpath 208/13 west of St. Asaph (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 13 and 14).	No potential for significant effects.									
Representative viewpoint 8 – View southeast from farm gate off Glascoed Road, adjacent to Bryn-celyn (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 15 and 16).	No potential for significant effects.									
Representative viewpoint 9 – View south-southeast from public bridleway 201/9 east of Bodelwyddan Park (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 17 and 18).	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible (year 1 winter) and no change (summer) D: Negligible	C: High O: High D: High	C: negligible to minor adverse (not significant) O: no change to negligible adverse (not significant) D: negligible to minor adverse (not significant)	None	C: negligible to minor adverse (not significant) O: no change to negligible adverse (not significant) D: negligible to minor adverse (not significant)	A LEMP will be a requirement of the DCO.
Representative viewpoint 10 – View south from Twthill adjacent to public footpath 206/27 / access track to Rhuddlan Castle	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape	C: Negligible O: Negligible	C: High O: High	C: negligible to minor adverse (not significant)	None	C: negligible to minor adverse (not significant)	A LEMP will be a requirement of the DCO.

(Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 19 and 20).				and Ecology Strategy Plan (Figure 6.5).	D: Negligible	D: High	O: negligible to minor adverse (not significant) D: negligible to minor adverse (not significant)		O: negligible to minor adverse (not significant) D: negligible to minor adverse (not significant)	
Representative viewpoint 11 – View west-southwest from Offa's Dyke Path, to the south of Moel Maenefa (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 21 and 22).	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: Very high O: Very high D: Very high	C: minor adverse (not significant) O: minor adverse (not significant) D: minor adverse (not significant)	None	C: minor adverse (not significant) O: minor adverse (not significant) D: minor adverse (not significant)	A LEMP will be a requirement of the DCO.
Representative viewpoint 12 – View west-southwest from Offa's Dyke Path, to the south of Pen-y-Mynydd (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 23 and 24).	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: Very high O: Very high D: Very high	C: minor adverse (not significant) O: minor adverse (not significant) D: minor adverse (not significant)	None	C: minor adverse (not significant) O: minor adverse (not significant) D: minor adverse (not significant)	A LEMP will be a requirement of the DCO.
Representative viewpoint 13 – View southwest from Cwttir Lane, south of junction with Heol Esgob (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 25 and 26).	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: High O: High D: High	C: minor adverse (not significant) O: negligible to minor adverse (not significant)	None	C: minor adverse (not significant) O: negligible to minor adverse (not significant)	A LEMP will be a requirement of the DCO.

							D: minor adverse (not significant)		D: minor adverse (not significant)	
Representative viewpoint 14 – View northwest from minor road close to junction with access track to Coed Kendrick/Wigfair Home Farm (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 27 and 28).	No potential for significant effects.									
Representative viewpoint 15 – View south from North Wales Path (public footpath 26/30) / NCN 84 northwest of Rhuddlan (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 29 and 30).	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: High O: High D: High	C: negligible to minor adverse (not significant) O: negligible to minor adverse (not significant) D: Negligible to minor adverse (not significant)	None	C: negligible to minor adverse (not significant) O: negligible to minor adverse (not significant) D: negligible to minor adverse (not significant)	A LEMP will be a requirement of the DCO.
Representative viewpoint 16 – View southwest from public footpath 206/999 to the southeast of Pengwern College (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 31 and 32).	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible (winter) to no change (summer) D: Negligible	C: High O: High D: High	C: negligible to minor adverse (not significant) O: negligible to minor adverse (not significant) in winter to no change in summer	None	C: negligible to minor adverse (not significant) O: negligible to minor adverse (not significant) in winter to no change in summer	A LEMP will be a requirement of the DCO.

							D: negligible to minor adverse (not significant)		D: negligible to minor adverse (not significant)	
Representative viewpoint 17 – View southwest from pubic footpath 208/10 to the west of Upper Denbigh Road (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 33 and 34).	No potential for significant effects.									
Representative viewpoint 18 – View southwest from Graig Fawr summit, Clwydian Range and Dee Valley NL (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 35 and 36).	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: High O: High D: High	C: negligible to minor adverse (not significant) O: negligible to minor adverse (not significant) D: negligible to minor adverse (not significant)	None	C: negligible to minor adverse (not significant) O: negligible to minor adverse (not significant) D: negligible to minor adverse (not significant)	A LEMP will be a requirement of the DCO.
Representative viewpoint 19 – View southwest from Offa's Dyke Path / public footpath 405/12, Prestatyn hillside, Clwydian Range and Dee Valley NL (Volume 7, Annex 6.5: Landscape	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: Very high O: Very high D: Very high	C: minor adverse (not significant) O: minor adverse (not significant) D: minor adverse (not significant)	None	C: minor adverse (not significant) O: minor adverse (not significant)	A LEMP will be a requirement of the DCO.

visualisations, of the Environmental Statement, Figures 37 and 38).									D: minor adverse (not significant)	
Representative viewpoint 20 – View southeast from the Wales Coast Path at Pont y Ddraig footbridge over the River Clwyd, Kinmel Bay, Rhyl (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 39 and 40).	No potential for significant effects.									
Representative viewpoint 21 – View southwest from B5429, adjacent to Criccin Cross, southeast of Rhuddlan (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 41 and 42).	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: Low O: Low D: Low	C: negligible adverse (not significant) O: negligible adverse (not significant) D: negligible adverse (not significant)	None	C: negligible adverse (not significant O: negligible adverse (not significant) D: negligible adverse (not significant)	A LEMP will be a requirement of the DCO.
Representative viewpoint 22 – View west from public footpath 210/6 north of Wern Ddu (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental	No potential for significant effects.									

Statement, Figures 43 and 44).										
Representative viewpoint 23 – View east from Wales Coast Path, to the east of Llandulas Beach	✓			Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Small	C: High	C: minor to moderate adverse (not significant)	None	C: minor to moderate adverse (not significant)	A LEMP will be a requirement of the DCO.
Representative viewpoint 24 – View west from Wales Coast Path to the west of Abergele Beach	✓			Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Small	C: High	C: moderate adverse (not significant)	None	C: moderate adverse (not significant)	A LEMP will be a requirement of the DCO.
Representative viewpoint 25 – View northeast from Moelfre Isaf summit on public footpath 19/26	✓			Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Small	C: High	C: moderate adverse (not significant)	None	C: moderate adverse (not significant)	A LEMP will be a requirement of the DCO.
Representative viewpoint 26 – View southeast from public footpath 16/14 at Tan y Gopa Road	✓			Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Small	C: High (Medium for cyclists and low for drivers)	C: minor to moderate adverse (not significant)	None	C: minor to moderate adverse (not significant)	A LEMP will be a requirement of the DCO.
Representative viewpoint 27 – View east from B5381 at Bryn-Tirion/Ffynnon Wen southwest of Cwttir Lane	✓			Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape	C: Small	C: Low (Medium for cyclists)	C: minor adverse (not significant)	None	C: minor adverse (not significant)	A LEMP will be a requirement of the DCO.

				and Ecology Strategy Plan (Figure 6.5).						
Representative viewpoint 28 – View southeast from junction of B5831, at Glascoed Road	✓			Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Small	C: Low (Medium for Cyclists)	C: minor adverse (not significant)	None	C: minor adverse (not significant)	A LEMP will be a requirement of the DCO.
Representative viewpoint 29 – View west-northwest from junction of B5381 at Glascoed Road	✓			Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Small	C: Low (Medium for Cyclists)	C: minor adverse (not significant)	None	C: minor adverse (not significant)	A LEMP will be a requirement of the DCO.
Representative viewpoint 30 – View east beyond southern end of public bridleway 208/3, adjacent to Coed Esgob (Volume 7, Annex 6.5: Landscape visualisations, of the Environmental Statement, Figures 45 and 46).	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Medium O: Small D: Medium	C: High O: High D: High	C: moderate adverse (not significant) O: moderate adverse (not significant) D: moderate adverse (not significant)	None	C: moderate adverse (not significant) O: moderate adverse (not significant) D: moderate adverse (not significant)	A LEMP will be a requirement of the DCO.

Table 2.2: Summary of potential cumulative environmental effects, mitigation, and monitoring.

[a] C=construction, O=operational and maintenance, D=decommissioning

Landscape and visual resources and receptors	Phase[a] C	O	D	Measures adopted as part of the project	Magnitude of impact	Sensitivity of the receptor	Significance of effect	Further mitigation	Residual effect	Proposed monitoring
Cumulative visual effects experienced by users of the public rights of way network and Access Land within the Clwydian Range and Dee Valley NL, together with proposed development projects										
Visual receptors – Users of public rights of way (within 1 km of the Onshore Substation)		✓		Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C:Negligible to small O: Negligible D: Negligble to small	C: Medium to high O: High to medium D: Medium to high	C: Minor to moderate (not significant) O: Moderate to minor adverse (not significant) D: Minor to moderate (not significant)	None	C: Minor to moderate (not significant) O: Moderate to minor adverse (not significant) D: Minor to moderate (not significant)	A LEMP will be a requirement of the DCO.
Visual receptors – Users of the Wales Coast Path		✓		Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: High O: High D: High	C: Negligible adverse (not significant) O: Negligible adverse (not significant) D: Negligible adverse (not significant)	None	C: Negligible adverse (not significant) O: Negligible adverse (not significant) D: Negligible adverse (not significant)	A LEMP will be a requirement of the DCO. .
Visual receptors – Users of the Offa's Dyke Path National Trail	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Small O: Small D:Small	C: Very high O: Very high D: Very hgih	C: Moderate adverse (not significant) O: Moderate adverse (not significant) D: Moderate adverse (not significant)	None	C: Moderate adverse (not significant) O: moderate adverse (not significant) D: Moderate adverse (not significant)	A LEMP will be a requirement of the DCO.

Landscape and visual resources and receptors	Phase[a] C	O	D	Measures adopted as part of the project	Magnitude of impact	Sensitivity of the receptor	Significance of effect	Further mitigation	Residual effect	Proposed monitoring
Visual receptors – Visitors to the Clwydian Range and Dee Valley NL	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Small O: Small D: Small	C: High O: High D: High	C: Moderate adverse (not significant) O: Moderate adverse (not significant) D: Moderate adverse (not significant)	None	C: Moderate adverse (not significant) O: Moderate adverse (not significant) D: Moderate adverse (not significant)	A LEMP will be a requirement of the DCO.
Cumulative effects on the <u>fabric of landscape</u> – elements and features together with proposed development projects										
Landmap Visual and Sensory Aspect Areas (DNBGHVS033 Cefn Estate Mosaic Rolling Lowland and DNBGHVS014 Area North and East of Bodelwyddan)	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Small to medium O: Small D: Small to medium	C: Medium O: Medium D: Medium	C: Minor to Moderate adverse (not significant) O: Minor adverse (not significant) D: Minor to moderate adverse (not significant)	None	C: Minor to Moderate adverse O: Minor adverse (not significant) D: Minor to moderate adverse (not significant)	A LEMP will be a requirement of the DCO.
Cumulative effects on the <u>aesthetic aspects</u> of landscape resources together with proposed development projects										
Nationally designated landscapes - Clwydian Range and Dee Valley NL: Aesthetic aspects	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Small O: Small D: Small	C: High O: High D: High	C: Moderate adverse (not significant) O: Moderate adverse (not significant) D: Moderate adverse (not significant)	None	C: Moderate adverse O: Moderate adverse (not significant) D: Moderate adverse (not significant)	A LEMP will be a requirement of the DCO.
Locally designated landscapes- Rhyd y Foel to Abergele and Elwy and Aled Valleys SLAs	No potential for aesthetic aspects of these medium senstivitiy landscape to be significantly affected.									

Landscape and visual resources and receptors	Phase[a] C	O	D	Measures adopted as part of the project	Magnitude of impact	Sensitivity of the receptor	Significance of effect	Further mitigation	Residual effect	Proposed monitoring
LANDMAP Visual and Sensory Aspect Areas (DNBGHVS033 Cefn Estate Mosaic Rolling Lowland and DNBGHVS014 Area North and East of Bodelwyddan)	✓	✓	✓	Implementation of primary and secondary measures set out in Table 6.20 within the areas shown on Figure 6.5 and reinstatement of hedgerows where open-cut techniques used for cable laying	C: Medium (direct) and Small (indirect) O: Negligble D: Medium	C:Medium O:Medium D: Medium	C: Moderate adverse (Cefn Estate mosaic rolling lowland Aspect Area) to minor adverse (Land north and east of Boddelwyddan Aspect Area) (not significant) O: Minor adverse (Cefn Estate mosaic rolling lowland Aspect Area) to negligible adverse Land north and east of Boddelwyddan Aspect Area (not significant) D: Moderate adverse (Cefn Estate mosaic rolling lowland Aspect Area) to minor adverse (Land north and east of Boddelwyddan Aspect Area) (not significant)	None	C: Moderate adverse (Cefn Estate mosaic rolling lowland Aspect Area) to (minor adverse Land north and east of Boddelwyddan Aspect Area) (not significant) O: Minor adverse (Cefn Estate mosaic rolling lowland Aspect Area) to negligible adverse Land north and east of Boddelwyddan Aspect Area (not significant) D: Moderate adverse (Cefn Estate mosaic rolling lowland Aspect Area) to minor adverse (Land north and east of Boddelwyddan Aspect Area) (not significant)	A LEMP will be a requirement of the DCO.
Cumulative effects on the <u>overall character</u> of landscape resources together with proposed development projects										
Nationally designated landscapes - Clwydian Range and Dee Valley NL: Overall character	✓	✓	✓	Implementation measures set out in Table 6.20 and within the areas shown on the Illustrative Landscape and Ecology Strategy Plan (Figure 6.5).	C: Negligible O: Negligible D: Negligible	C: High O: High D: High	C: Minor adverse (not significant) O: Minor adverse (not significant)	None	C: N/A O: minor adverse (not significant) D: Minor adverse (not significant)	A LEMP will be a requirement of the DCO.

Landscape and visual resources and receptors	Phase[a] C	O	D	Measures adopted as part of the project	Magnitude of impact	Sensitivity of the receptor	Significance of effect	Further mitigation	Residual effect	Proposed monitoring
							D: Minor adverse (not significant)			
Locally designated landscapes- Rhyd y Foel to Abergele and Elwy and Aled Valleys SLAs	No potential for aesthetic aspects of these medium senstivitiy landscape to be significantly affected.									
LANDMAP Visual and Sensory Aspect Areas (Figure 6.3): Tier 1 and 3	✓	✓	✓	None on the footprint of the substation itself. Within the landscape mitigation area – Implementation of primary and secondary measures set out in Table 6.20 within the areas shown on Figure 6.5 and reinstatement of hedgerows where open-cut techniques used for cable laying	C:Small O: Negligible to small D: Small	C: Medium O:Medium D: Medium	C:Minor adverse (not significant) O: Negligible to minor adverse (not significant) D: Minor adverse (not significant)	None	C: Minor adverse (not significant) O: Negligible to minor adverse (not significant) D: Minor adverse (not significant)	A LEMP will be a requirement of the DCO.