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MONA OFFSHORE WIND PROJECT

Response to Examining Authority's Written Questions (ExQ1)

Deadline: 3

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Image of an offshore wind farm

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Appropriate Assessment	A step-wise procedure undertaken in accordance with Article 6(3) of the Habitats Directive, to determine the implications of a plan or project on a European site in view of the site's conservation objectives, where the plan or project is not directly connected with or necessary to the management of a European site but likely to have a significant effect thereon, either individually or in-combination with other plans or projects.
Bodelwyddan National Grid Substation	This is the Point of Interconnection (POI) selected by the National Grid for the Mona Offshore Wind Project.
Competent Authority	Regulation 6(1) defines competent authorities as "any Minister, government department, public or statutory undertaker, public body of any description or person holding a public office".
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Statement (ES)	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
ADR	Alternative Dispute Resolution
AEoI	Adverse effect on integrity
ALARP	As Low As Reasonably Practicable
ALC	Agricultural Land Classification
ALO	Agricultural Liaison Officer
ATC	Air Traffic Control
BAE	British Aerospace
BEIS	Department for Business, Energy and Industrial Strategy
BNG	Biodiversity net gain
BRAG	Black-Red-Amber-Green
BoCC	Birds of Conservation Concern
CAA	Civil Aviation Authority
CAP	Conservation Advice Package
CCBC	Conwy County Borough Council
CEA	Cumulative Effects Assessment
CfD	Contract for Difference
CFLO	Company Fisheries Liaison Officer
CL:AIRE	Contamination Land Applications in Real Environment
CMS	Construction Method statement
CoCP	Code of Construction Practice
CRNRA	Cumulative Regional Navigation Risk Assessment
CSIP	Cable Specification and Installation Plan
DAS	Digital Aerial Surveys
DCLG	Department for Communities and Local Government
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
DIO	Defence Infrastructure Organisation
dML	deemed Marine Licence

Acronym	Description
ECOWind	Ecological Consequences of Offshore Wind research programme
ECRA	Export Cable Route Assessment
EMF	Electromagnetic Fields
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EnBW	Energie Baden-Württemberg AG
EWG	Expert Working Group
ExA	Examining Authority
FIR	Fishing Industry Representative
FLCP	Fisheries Liaison and Coexistence Plan
JNCC	Joint Nature Conservation Committee
HGV	Heavy Goods Vehicle
HRA	Habitats Regulations Assessment
HVAC	High Voltage Alternating Current
IEF	Important Ecological Feature
IEMA	Institute for Environmental Management and Assessment
IoACC	Isle of Anglesey County Council
ISAA	Information to support the Appropriate Assessment
GCN	Great Crested Newt
GHG	Greenhouse Gas
LAT	Lowest Astronomical Tide
LCMS	Landfall Construction Method Statement
LEMP	Landscape and Ecological Management Plan
LoS	Line of Sight
LSE	Likely Significant Effects
MCA	Maritime and Coastguard Agency
MDS	Maximum Design Scenario
MGN	Marine Guidance Note
MHWS	Mean High Water Springs
MLPD	Marine Licence Principles Document
MLWS	Mean Low Water Springs
MMP	Materials Management Plan
MMMP	Outline Marine Mammal Mitigation Protocol
MNEF	Marine Navigation Engagement Forum
MNR	Marine Nature Reserve

Acronym	Description
MNR	Marine Noise Registry
MPA	Marine Protected Area
MU	Management Unit
NAS	Noise Abatement Systems
NBB	Net Benefits for Biodiversity
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NPWS	National Parks & Wildlife Service
NRA	Navigational Risk Assessment
NRMM	Non-Road Mobile Machinery
NRW (A)	Natural Resources Wales Advisory
NRW (MLT)	Natural Resources Wales Marine Licensing Team
NSIP	Nationally Significant Infrastructure Project
NTS	Non-Technical Summary
OCTMP	Outline Construction Traffic Management Plan
OFLO	Offshore Fisheries Liaison Officer
OFTO	Offshore Electricity Transmission
OSEP	Outline Skills and Employment Plan
OSP	Offshore Substation Platform
PDE	Project Design Envelope
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
POI	Point of Interconnection
PSR	Primary Surveillance Radar
PVA	Population Viability Analysis
RR	Relevant Representations
RSPB	Royal Society for the Protection of Birds
RSP	Regional Skills Partnership
SAC	Special Area of Conservation
SEP	Skills and Employment Plan
SMZ	Scallop Mitigation Zone
SNCBs	Statutory Nature Conservation Bodies
SoCC	Statement of Community Consultation
SoCG	Statement of Common Ground
SoR	Statement of Resasons

Acronym	Description
SoS	Secretary of State
SPA	Special Protection Area
SSCs	Suspended Sediment Concentrations
SSSI	Site of Special Scientific Interest
TCE	The Crown Estate
TMZ	Transponder Mandatory Zone
ToR	Terms of Reference
TWT	The Wildlife Trusts
UKOTCF	UK Overseas Territories Conservation Forum
UWSMS	Outline Underwater Sound Management Strategy
UXO	Unexploded Ordnance
VMS	Vessel Monitoring System
VP	Viewpoint
WCSP	West Coast Sea Products
WNMP	Welsh National Marine Plan
WR	Written Representation
WTW	Wildlife Trust Wales

Units

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

1 Response Examining Authority's Written Questions (ExQ1)

1.1 Introduction

1.1.1.1 The Applicant's response to the Examining Authority's Written Questions can be found below and in the accompanying appendices, documents S_D3_25.1 through to S_D3_25.10.

2 Response to Examining Authority's Written Questions (ExQ1)

2.1 General and Cross Topic Questions

Table 2.1: Response to ExQ1: General and Cross Topic Questions

Reference	Question to	ExQ1	Applicant's response
	The Applicant *IGP Solar 21 Limited*	Cumulative effects [AS-23] from IGP Solar 21 Limited refers to the proposed construction of a battery storage facility on land at Pentre Mawr which would overlap with Works Nos 25 and 26 for the Mona OWF. Applicant: Will the proposed development be brought into the CEA? IGP Solar 21 Limited: What details are you able to submit, including anticipated timescales, into the Examination?	The Applicant notes that information on the IGP Solar 21 Limited's battery storage project has not been submitted into the public domain and therefore, the potential cumulative impacts of the project cannot be assessed at this stage.
Q1.0.1	The Applicant	**Cumulative effects** In [REP1-011] (Table 1.17), its states that a review of recently published material in relation to proposed offshore wind farms in the west Irish Sea are currently being undertaken, in light of the submissions from Meath County Council [OD-021]. • When will this review be completed? • Record any changes in an updated version of [APP-084].	A review of the Cumulative Effects Assessment (CEA) to account for recently published information on other projects, plans and activities (including those highlighted in the submission from Meath County Council (OD-021)) has been completed for Deadline 3. This is presented in the Review of Cumulative Effects Assessment and In-Combination Assessment (S_D3_18). The conclusions of this review are that none of the projects, plans and activities considered would result in any increases of significance of cumulative effects to those presented in the application. An updated version of the Cumulative effects screening matrix has also been submitted at Deadline 3 (F5.5.1 F02).
Q1.0.2	The Applicant	**Cumulative effects** Whilst the ExA notes the provision of a Cumulative Effects Screening Matrix, it would assist if a table that presents an assessment of cumulative impacts including the likely significant effects of the Proposed Development with 3rd	Please see the Applicant's response to this question in S_D3_25.1 Appendix to ExQ1 Q1.0.2 Assessment of cumulative impacts.

Reference	Question to	ExQ1	Applicant's response
		party developments was provided. The ExA would point the Applicant to [APP-177] of the Drax Carbon Capture and Storage Project as an example	
Q1.0.3	The Applicant *NRW (A)*	**NRW SoCG (Offshore)** Table 1.4 of [REP1-022] indicates that the SoCG being progressed with NRW (A) in relation to offshore matters covers 11 topics. However, REP1-025 only covers 7 of these topics. • Can the Applicant and NRW confirm whether or not the topics of commercial fisheries, shipping and navigation, marine archaeology and other sea users are to be included in any NRW SoCG?	Commercial fisheries, shipping and navigation, marine archaeology and other sea users are all out of the remit of NRW (A). These topics were erroneously marked as relevant to NRW (A) in the Statement of Commonality submitted at Deadline 1 (REP1-022). This has been added to the Errata sheet submitted at Deadline 3 (S_PD_1 F04) corrected in the Statement of Commonality submitted at Deadline 3 (S_D1_7 F02).
Q1.0.4	The Applicant	**Welsh National Marine Plan** Can the Applicant summarise how it meets the policy aim of Welsh National Marine Plan underwater noise (ENV_05) to monitor and collect evidence to improve understanding of areas of concern such as drilling and pilling, and seismic surveys including the use of sonar.	Welsh National Marine Plan (WNMP) Policy ENV_05 is: ***ENV_05: Underwater noise*** *Proposals should demonstrate that they have considered man-made noise impacts on the marine environment and, in order of preference:* *a. avoid adverse impacts; and/or* *b. minimise impacts where they cannot be avoided; and/or* *c. mitigate impacts where they cannot be minimised.* *If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.* The policy aim referred to in this Question is to: '*manage noise impacts using best available evidence and to monitor and collect evidence to improve our understanding*.' As set out in the Planning Statement (APP-186), with regard to WNMP Policy ENV_05, potential underwater sound impacts have been considered through project-specific modelling in Volume 5, Annex 3.1: Underwater sound technical report (APP-079), with the findings assessed in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055) and Volume 2, Chapter 4: Marine mammals (APP-056).

Reference	Question to	ExQ1	Applicant's response
			In alignment with clause a and b of ENV_05, the Applicant has focused on avoiding and minimising impacts. The Applicant has followed a staged site selection and design iteration process, taking into account environmental, physical, technical, commercial, and social considerations and opportunities as well as engineering requirements. Where possible, the Applicant has minimised the footprint for the Mona Offshore Cable Corridor and Access Areas and Mona Onshore Cable Corridor, avoided key sensitive features and minimised the disruption to key ecological features (Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-016)). After statutory consultation, the Applicant made major changes to reduce the potential impact of the Mona Offshore Wind Project, in particular, to reduce underwater sound (Volume 1, Chapter 3: Project Description APP-050). These included: • Reduction of the maximum number of wind turbines from 107, as proposed within the Preliminary Environmental Information Report, to a final maximum design of 96. • Removal of monopile foundations from the design envelope. • Reduction of the maximum hammer energy from 5,500kJ to 4,400kJ. • Only 64 of the total 96 foundation locations may be piled. The Applicant has also committed to the preparation of an Outline Marine Mammal Mitigation Protocol (MMMP) (APP-207) and an Outline Underwater Sound Management Strategy (UWSMS) (APP-202). The MMMP (APP-207) sets out the range of primary and tertiary measures adopted as part of the project to reduce or eliminate the risk of auditory injury effects of underwater sound (due to piling, UXO clearance and geophysical survey) during pre-construction and construction phases of the Mona Offshore Wind Project on marine mammals. The UWSMS (APP-202) provides a strategy to reduce the magnitude of impacts from elevated underwater sound from the Mona Offshore Wind Project, such that there is no significant effect on fish or marine mammals. The Applicant has, therefore, mitigated any potential impacts and is in alignment with clause c of ENV_05. In relation to fish ecology, NRW(A) state in their Written Representation (paragraph 208 of REP1-056) 'Providing the UWSMS is properly

Reference	Question to	ExQ1	Applicant's response
			developed with NRW (A) and achieves the aims of reducing the impact of noise on both herring and cod spawning, then additional validation monitoring of the impacts of the Mona project should not be required'. In relation to marine mammals, NRW(A) stated in their Written Representation (paragraph 180 of REP1-056) that 'NRW(A) confirm that for marine mammals, in view of the overall conclusions in this assessment and the commitment to an UWSMS, provided the UWSMS is produced in consultation with SNCBs during the post-consent stage, marine mammal monitoring to test the predictions made within the impact assessment would not be required from a consenting perspective although any additional data collection carried out by the applicant would be welcome'. Schedule 14, Condition 25 (2) of the Draft Development Consent Order (C1 Draft Development Consent Order F05) contains the Applicant's commitment that in the event that driven or part-driven pile foundations are proposed, monitoring, including measurements of underwater sound generated by the installation of the first four piled foundations of each piled foundation type to be installed must be carried out and must be provided to NRW MLT within six weeks of the installation of the first four piled foundations. Schedule 14, Condition 29 of the Draft Development Consent Order (C1 Draft Development Consent Order F05) contains the Applicant's commitment to provide data to the Marine Noise Registry (MNR), including the data needed to meet the 'forward look' and 'backward look' requirements as set out in the 'UK Marine Noise Registry: Information Document, Version 1 (May 2016)'. These requirements are: • The 'forward look' section collates estimated, planned information for proposed activities • The 'backward look' section collates the actual (accurate) activity information, after the activity has taken place. Following submission of this data, including underwater sound data from the first four piles, to the MNR, it will be publicly accessible. This data can thereafter be used to benchmark the modelled sound levels and in doing so will help to inform the industry by improving understanding of this area

Reference	Question to	ExQ1	Applicant's response
			of concern. The Applicant therefore intends to monitor and collect data to improve the industry understanding of underwater impacts from offshore wind projects, in alignment with the aim of ENV_05.
Q1.0.5	The Applicant	**Welsh National Marine Plan** Can the Applicant summarise how it meets the policy aim of Welsh National Marine Plan that biological and geological components of ecosystems are maintained, restored where needed and enhanced where possible, to increase the resilience of marine ecosystems and the benefits they provide.	Welsh National Marine Plan Policy ENV_01 is: ***ENV_01: Resilient marine ecosystems*** *Proposals should demonstrate how potential impacts on marine ecosystems have been taken into consideration and should, in order of preference:* *a. avoid adverse impacts; and/or* *b. minimise impacts where they cannot be avoided; and/or* *c. mitigate impacts where they cannot be minimised.* *If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.* *Proposals that contribute to the protection, restoration and/or enhancement of marine ecosystems are encouraged.* The policy aim referred to in this Question is to: *'ensure that biological and geological components of ecosystems are maintained, restored where needed and enhanced where possible, to increase the resilience of marine ecosystems and the benefits they provide.'* Paragraph 4.6.1.1 of Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-016) states that: '*Applicant has followed a staged site selection and design iteration process from inception to the point of submission of the application for Development Consent to identify the most suitable locations and configuration, based on the criteria outlined above for the Mona Offshore Wind Project infrastructure. The process has taken account of environmental, physical, technical, commercial, and social considerations and opportunities as well as engineering requirements*.'

Reference	Question to	ExQ1	Applicant's response
			As per the Planning Statement (APP-186), it has been demonstrated that the Mona Offshore Wind Project accords with WNMP Policy ENV_01 with regards to the following relevant topics: • Physical processes • Benthic subtidal and intertidal ecology • Fish and shellfish ecology • Marine mammals • Offshore ornithology. This has been achieved by ensuring that designated sites and sites of interest due to ecological importance (within the relevant topic-specific study areas) have been identified, and as per the above paragraph taken from Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-016), that the site selection and project design processes were iterative and aimed to minimise impacts on biological and geological ecosystems, thereby ensuring that these can be maintained. Where potential impacts on these sites have been identified through the robust assessments presented in the topic-specific Environmental Statement chapters and Habitats Regulations Assessment materials, the Mona Offshore Wind Project has committed to measures to avoid or minimise effects on receptors as far as possible, in order to maintain the resilience of marine ecosystems. Mitigation measures adopted as part of the Mona Offshore Wind Project are presented in the Mitigation and Monitoring Schedule submitted at Deadline 3 (J10 F03). As per ENV_01, these aim to avoid, minimise or mitigate the potential impacts of the Mona Offshore Wind Project, and include, among other measures: • Monitoring of the Mona Offshore Wind Project cables and their burial status as part of a Cable Specification and Installation Plan (CSIP) to monitor the effect of sediment transport and sediment transport pathways on cable burial.

Reference	Question to	ExQ1	Applicant's response
			• A commitment to no sandwave clearance within the Menai Strait and Conwy Bay Special Area of Conservation (SAC) to minimise potential impacts on the physical and ecological features of the Menai Strait and Conwy Bay SAC. • A commitment to not installing cable protection within Constable Bank to minimise potential impacts on the physical features of Constable Bank. • A commitment to developing an UWSMS (APP-202) to reduce the magnitude of impacts from elevated underwater sound from the Mona Offshore Wind Project, such that there is no significant effect on fish or marine mammals. Further to this, the Biodiversity Benefit and Green Infrastructure Statement (APP-193) outlines the policy relating to the provision of net biodiversity benefit and green infrastructure across the Mona Offshore Wind Project. That document also describes how green infrastructure has been incorporated and how biodiversity net benefit will be achieved across the onshore, intertidal and offshore elements of the Mona Offshore Wind Project in order to, where possible, enhance the resilience of marine ecosystems. The Applicant has identified a number of opportunities (see paragraph 3.6.3.1 in the Biodiversity Benefit and Green Infrastructure Statement (APP-193)) which could deliver additional intertidal and offshore biodiversity benefits to the Mona Offshore Wind Farm Project. The Applicant is continuing to engage with prospective project partners and stakeholders regarding marine and intertidal habitat and species restoration projects in the eastern Irish Sea.
Q1.0.6	The Applicant *DCC, CCBC, NRW(A)*	**Other Consents or Licenses Required [APP-085]** Can respective parties give a progress update on the licences and consents and advise if there are any that raise concerns that may lead to refusal.	The Applicant submitted an application for listed building consent in respect of the proposed works to the boundary wall at Gwrych Castle on Monday 25th August. The reference number is PP-13228145. The application has been validated by CCBC on 20th August 2024 and comments have been received from the CCBC Conservation Officer, CCBC Environment, Roads & Facilities and Abergele Town Council. No objections have been received to date. The application will be determined as soon as possible and is expected to be heard at an upcoming CCBC Planning Committee. The Applicant is not aware of any reasons to believe there are any barriers to consent.

2.2 Construction

Table 2.2: Response to ExQ1: Construction Questions

i) Reference	ii) Question to	iii) ExQ1	iv) Applicant's response
Q1.2.1	The Applicant	**Materials Management Plan** ES Chapter 3 (Vol 1) paragraph 3.12.1.3 [APP-050] states that in addition to a Site Waste Management Plan (SWMP), a MMP would be prepared and agreed prior to commencement of earthworks. In the Outline SWMP [APP-221], paragraph 1.4.2.12, mention is made of the MMP being prepared post consent. Can you clarify: • when it would be prepared and agreed; • whether it is intended to be relied on as mitigation; and • if so, how it would be secured?	The CL:AIRE (Contamination Land Applications in Real Environments) Definition of Waste Code of Practice (CoP) (CL:AIRE, 2011) process is a process which developers use as an alternative to obtaining an environmental permit for the movement and use of excavated material on site. This process sits separately from any consenting process. The CL:AIRE process uses a Materials Management Plan (MMP) prepared by developers as the means by which movement of excavated material is managed. This MMP is then signed off by a CL:AIRE CoP certified Qualified Person. It is not the intention that a final MMP will be submitted to the local planning authority through the process of discharging the final Site Waste Management Plan (SWMP) under Requirement 9 of the Draft development consent order (REP2-004). The MMP and CL:AIRE process are referred to within the Outline SWMP (REP2-056) as they form part of the standard construction practices which apply to the Mona Offshore Wind Project. The CL:AIRE process is one of a number of options available to Mona Offshore Wind Project to achieve the outcomes of the SWMP but the MMP is not in itself relied on as mitigation. Through the discharge of the final SWMP, the local planning authority will have the opportunity to approve the principle of relying on the CL:AIRE process but will not otherwise be involved in the approvals process for the final MMP which (as above) is approved by a qualified person under the CL:AIRE process.
Q1.2.5	The Applicant	**OCoCP [REP2-038]** Can you advise why "general accordance" rather than in accordance has been used within paragraphs 1.3.1.4, 1.5.1.3 and 1.7.6.1 of the OCoCP in relation to the final CoCP and the final LCMS and OCMS.	The Applicant notes that the term 'general accordance' has been used across all of the outline management plans submitted in the DCO application for the Mona Offshore Wind Project. The Applicant can confirm that the final LEMP, CoCP and its appendices will be prepared in accordance with (rather than in 'general' accordance with) the outline management plans. The text within the outline management plans will be

i) Reference	ii) Question to	iii) ExQ1	iv) Applicant's response
			updated at the next iteration of the documents or for the final Deadline (whichever is earlier) to reflect this change.
Q1.2.6	The Applicant	**OCoCP [REP2-038]** Section 1.7.4 refers to Principal Contractor and that its Environmental Management System would provide the process and would set out monitor compliance and effectiveness of the measures included in the CoCP. Paragraph 1.7.5.2 refers to management measures would be updated where necessary in discussion with the relevant planning authority. Can you clarify when updates are undertaken whether any Principal Contractor management plans would also be updated and issued to the relevant planning authority.	The Applicant notes that Section 1.7.4 of the Outline CoCP (REP2-038) refers to the Principal Contractor's procedures within its Environmental Management System (EMS). The EMS is a framework that provides a structured approach to monitor, control and improve environmental performance. The EMS is accredited under the British Standard ISO system that sits outside the controls in the DCO. The EMS will be used to manage and monitor the Principal Contractor's implementation of the measures within the CoCP and associated management plans as part of the construction planning and management process. These procedures will undergo internal review by the Principal Contractor as part of its EMS. The Applicant confirms that where updates are made to the measures within the CoCP and other management plans (in discussion with the relevant planning authority), the Principal Contractor's EMS procedures will also be updated to reflect these changes, where required. The EMS will not be submitted to the local planning authorities for approval as the details relevant to those discharges will be submitted through the relevant requirements of the DCO.
Q1.2.7	The Applicant	**OCoCP [REP2-038]** Paragraph 1.8.2.2 refers to activities that may be undertaken during the mobilisation period. Can the Applicant summarise: i) the typical tasks and plant involved with site maintenance; and ii) advise on the noise levels (dBA) associated with safety checking of plant and machinery.	i) The Applicant can confirm that site maintenance in this context will involve addressing the items identified during site inspections and safety checks. Examples of these items could involve the following activities: • maintenance of traffic management; such as re-setting cones and picking up signs etc.; • picking up fencing that may have been blown over in the wind; • making sure that excavations are adequately fenced • making sure that pumps that are de-watering overnight have sufficient fuel; • making sure that access gates are secured; and

i) Reference	ii) Question to	iii) ExQ1	iv) Applicant's response
			• any site signage is correctly positioned and legible. Please note that this is not an exhaustive list. Equipment used to undertake these measures will typically be a 3-tonne pickup with a two-man maintenance gang with all activities being done by hand with no plant support. ii) As stated above, no plant will be required for these activities. An indicative noise level associated with a moving 3-tonne pickup accessing the relevant site location is 102 dBA. The noise generated by a 3-tonne pickup would be similar to that already experienced on the local road network.
Q1.2.8	The Applicant	**OCoCP [REP2-038]** For extended working hours (paragraph 1.8.2.4), reference is made to time critical activities. As these activities are high level and lack detail can the Applicant explain: i) how time critical high level activities are developed into detail and shared with the relevant planning authority and the local community; ii) why advance notice to the relevant planning authority (for activities at the Onshore substation) is limited to not less than 48hrs; and iii) what is meant by a programme of safety critical operations.	i) The full list of time critical activities which may require extended working hours will be determined during detailed design. The following information will be provided to the relevant planning authority a minimum of 48 hours (as per Requirement 14 of Schedule 2 of the draft development consent order (Draft DCO) (Document Reference REP2-004)) prior to activity taking place within the extended working hours: - Scope of Work - Location of Works - Proposed Working Hours - Plant & Equipment to be used with dBA levels provided - Risk Assessment & Method Statement. This detail will be added to the Outline Code of Construction Practice at deadline 4. Key information will also be publicised via the Communication Liaison Officer (CLO), as set out in the Outline Communications Plan [REP2-046] (see paragraph 1.6.1.1 of that document). ii) Requirement 14 of Schedule 2 of the Draft DCO specifies at 14(3) that at least 48 hours' notice must be given to the local planning authority in relation to seeking approval for certain activities to take place outside of the specified construction hours. This includes activities at the onshore substation which are listed in 14(2) (save for trenchless technique works and emergency works). Mona drafted the Requirement in this way following feedback from Denbighshire County Council in their section 42 pre-application

i) Reference	ii) Question to	iii) ExQ1	iv) Applicant's response
			statutory consultation. The Draft DCO also does not specify that the period should be 48 hours precisely, only that it should be at least 48 hours' notice of seeking approval for the extended construction hours. As such, notice may be given more than 48 hours' in advance if that is possible at the time of needing to make the request. See row Mon_002_031_080623 of Consultation Report Appendices- Part 3 (D.25 - F), Table D.25.31 Draft Development Consent Order (including deemed marine licences) table of responses. iii) A 'programme of safety critical operations' has been included in the list of activities where extended working hours may be required (as per paragraph 1.8.2.4 of the OCoCP [REP2-038]) to capture any activities that have not currently been specified that may be identified during detailed design. Only activities which are required to be undertaken for a safety reason will be performed outside of the standard working hours.
Q1.2.9	The Applicant	**OCoCP [REP2-038]** Paragraph 1.8.2.5 states that emergency works may also be undertaken outside of the core working hours. Can the Applicant confirm if emergency works are those related to procedures for storing and handling potential pollutants during construction, and controlling and managing spillages, or are emergency works safety critical operations.	The Applicant can confirm that emergency works as defined in the draft development consent order (Draft DCO) (Document Reference REP2-004) and described in Section 1.8.2 of the Outline Code of Construction Practice [REP2-038] could cover the controlling and managing spillages should they occur, as described in the Outline Spillage and Emergency Response Plan [REP2-040]. However, emergency works are also those which may be required in the event of a range of other potential emergency situations, examples of which include (but are not limited to): - Traffic management vandalism - Extreme weather conditions - Equipment/Plant failure - Livestock escape - Report of security or safety breach
Q1.2.10	The Applicant	**OOCMS [REP2-068]** Can you provide a draft annotated layout plan of: i) the primary temporary construction compound; and	The Applicant has provided a draft annotated layout plan for the primary temporary construction compound in S_D3_25.3 Appendix to ExQ1 Q1.2.10 Indicative temporary construction compound layouts. Note that the drawing is indicative only and provided only to aid understanding.

i) Reference	ii) Question to	iii) ExQ1	iv) Applicant's response
		ii) the onshore substation temporary construction compound.	The primary temporary construction compound layout plan is based on the parameters as set out in the Project Description (APP-050) of 150 m x 150 m. Landscaping, topsoil storage and surface water attenuation locations may vary depending on site specific details to be agreed as part of the discharge of the relevant DCO Requirements associated with Work No. 10 and the stage it will be discharged within. Note that internal accesses within annotated areas are not shown. The Applicant has also provided a draft annotated layout plan of the onshore substation temporary construction compound in Appendix to ExQ1 Q1.2.10 Indicative temporary construction compound layouts (S_D3_25.3). Note that the drawing is indicative only and provided only to aid understanding. The layout plan aligns with Work Nos. 23 and 24within the Works Plans – Onshore (AS-003) by adding clarity over how the 150,000 m^2 defined in the Project Description (APP-050) could be used for the temporary construction compound. Areas are broadly defined by the activities undertaken within them. It should be noted that the detailed design may allocate different areas within the work areas used, and the use of each sub-area may differ than as annotated. Access between areas is not specifically defined within Appendix to ExQ1 Q1.2.10 Indicative temporary construction compound layouts (S_D3_25.3) and will be determined depending on detailed design.

2.3 Civil and Military Aviation and Defence Interests

Table 2.3: Response to ExQ1: Civil and Military Aviation and Defence Interests Questions

Reference	Question to	ExQ1	Applicant's response
Q1.3.1	*Defence Infrastructure Organisation* The Applicant	**Effects on air traffic control radar at BAE Warton** The ExA notes that the parties are actively engaging to agree a mitigation solution for potential effects on air traffic control radar at BAE Warton [REP2-089]. Given that agreement with a number of other operational and proposed OWFs is contingent upon the outcome of those discussions, the ExA requests that any progress toward agreement with the Defence Infrastructure Organisation is reported to the Examination at the earliest opportunity.	In relation to the potential effects on the primary surveillance radar at BAE Warton, the Applicant is engaging with the Defence Infrastructure Organisation (DIO) on a DCO Requirement, which has been appended to the updated Statement of Common Ground with DIO submitted at Deadline 3 (S_D2_9 F02) and remains under discussion. Regarding mitigation requirements, engagement with BAE Warton is ongoing but there is currently no further update to the position presented in DIO.AR.13 of the SoCG with DIO (S_D2_9 F02) where, mitigation is likely to include as a minimum: optimisation of the radar for Mona Offshore Wind Project, flight trials and a safety case to the Civil Aviation Authority. The Applicant can provide the latest update at the hearing on 23 October.
Q1.3.4	The Applicant	**Ronaldsway Airport Primary Surveillance Radar** The ExA notes submissions [REP1-010] that Ronaldsway Airport is currently undertaking a wider surveillance strategy in light of proposals in the Irish Sea and that there may be a dependency between potential mitigation solutions for Ronaldsway Airport Primary Surveillance Radar (PSR) and discussions currently underway with NATS (En Route) plc. In light of the findings in [APP-075], the ExA encourages the Applicant to make all endeavours with Ronaldsway Airport to clarify and confirm the position on mitigation by Deadline 7 at the latest in order that the ExA can report fully on the matter. This should include: • what form the mitigation would take; • how and by whom it would be implemented; and • how it is secured, including the wording for any DCO Requirement.	Please see the agreement statements TSC.AR.10 to TSC.AR.12 of the updated Statement of Common Ground with the Isle of Man Territorial Seas Committee (S_D1_11_F02). These have been updated to note that Ronaldsway airport are undertaking a surveillance strategy to manage air traffic safeguarding which includes consideration of the Mona Offshore Wind Project and any potential mitigation requirements. The results of this strategy are anticipated to be shared with the Applicant ahead of Deadline 4. Following this, the Applicant will engage with Ronaldsway airport on any next steps and will update the Examining Authority at the next available opportunity. Further to this update, Isle of Man Territorial Seas Committee have confirmed on 26 September that Ronaldsway Airport have now received the surveillance strategy and are in the process of reviewing it before reaching out to the Applicant directly.

Reference	Question to	ExQ1	Applicant's response
Q1.3.5	The Applicant	**Liverpool Airport Primary Surveillance Radar** The ExA notes the Applicant's submissions (summarised in [REP1-010], ID 7b) that Liverpool Airport is not actively engaged in discussions on potential interference with PSR and mitigation. Nevertheless, [APP-075] identifies a moderate adverse effect in respect of Liverpool Airport PSR which, in the absence of further mitigation, represents a significant effect in EIA terms. The ExA therefore encourages the Applicant to make all endeavours with Liverpool Airport to clarify and confirm the position on mitigation by Deadline 7 at the latest in order that the ExA can report fully on the matter. This should include: • what form the mitigation would take; • how and by whom it would be implemented; and • how it is secured, including the wording for any DCO Requirement.	A radar Line of Sight (LoS) analysis across the Mona Array Area has been completed in order to establish theoretical radar detectability of the wind turbines, placed within the Mona Array Area to selected Primary Surveillance Radar (PSR) systems based on a maximum upper blade tip elevation of 364 m over lowest astronomical tide (LAT). The full details are presented in Appendix B of Volume 8, Annex 1.1: Aviation and radar technical report (APP-181). As per Figure 1.8 of Volume 8, Annex 1.1: Aviation and radar technical report (APP-181), the Radar LoS modelling results indicate that, due to the location of the Mona Array Area, the turbines are theoretically likely to be detectable by the Liverpool Airport PSR by varying degrees across the Mona Array Area. The southeast part of Mona Array Area, which is closest to the location of the Liverpool Airport PSR, will have the greatest theoretical detectability. Volume 4, Chapter 1: Aviation and radar (APP-075) concluded that the effect to the Liverpool Airport PSR would be of moderate adverse significance which is significant in EIA terms. During engagement on 08 November 2023, the Airport agreed to provide details of the Mona Offshore Wind Project to their radar manufacturer (Raytheon) in order to seek opinion on a potential route to mitigation of effect (as per the minutes presented in section J.12.1 of the Technical Engagement Plan Appendices – Part 2 (F to M) (APP-042) (noting the airport agreed to engaging with their radar manufacturer at previous meetings in July 2022 and March 2023 as set out in Table 1.5 of APP-075)). However, further discussion with the Airport over potential mitigation requirements has not progressed as Liverpool Airport has not submitted a Relevant Representation or a Written Representation into the Examination process. The Applicant is making further attempts to reconnect with Liverpool Airport to establish their position, currently without success, as without engagement with Liverpool Airport the mitigation solution is not able to be progressed.
Q1.3.6	The Applicant	**Liverpool Airport Primary Surveillance Radar** [REP1-010], ID 7b states that "any mitigation put in place for NATS would potentially apply to Liverpool Airport as well". Can the Applicant provide an update as to the extent to which the mitigation solution currently under discussion	The NATS Primary Surveillance Radar (PSR) Systems affected are Lowther Hill, St Anne's and Great Dun Fell. Previous acceptable mitigation of wind turbine effect to these systems by other east Irish Sea offshore wind farms (such as the Burbo Bank and Walney projects) has been achieved through agreement by NATS of PSR blanking and an application for an airspace change to implement a Transponder Mandatory Zone

Reference	Question to	ExQ1	Applicant's response
		with NATS would mitigate predicted effects on Liverpool Airport PSR?	(TMZ). Radar blanking of the affected areas will selectively remove all wind turbine radar returns. However, all other radar returns in the blanked area will also be removed. To resolve the removal of radar returns through radar blanking, an application to the Civil Aviation Authority (CAA) for an airspace change and the provision of a TMZ will remove impact created by the Mona Offshore Wind Project wind turbines. This is due to the transponder equipment carried by an aircraft providing the necessary information about that aircraft to Air Traffic Control (ATC). Further detail on TMZs can be found in paragraph 1.9.3.12 of Volume 4, Chapter 1: Aviation and radar (APP-075). In the case of the Liverpool Airport PSR, and if mitigation is required, the mitigation being sought with NATS may also be applicable. The successful application to the CAA for a TMZ to be placed over the Mona Array Area will provide an interim solution for the potential effect created by radar detection of operational wind turbines, should it occur, until a technical solution can be implemented through technical optimisation of the current Liverpool Airport PSR by Raytheon, their radar provider. For the mitigation to be successful, the Liverpool Airport PSR will need to 'blanked' over the Mona Array Area.

2.4 Climate Change and Greenhouse Gas Emissions

Table 2.4: Response to ExQ1: Climate Change and Greenhouse Gas Emissions Questions

Reference	Question to	ExQ1	Applicant's response
Q1.4.1	The Applicant	**Greenhouse Gas Emissions** In [APP-076] section 2.10.4, the impact of greenhouse gas emissions arising from the manufacturing and installation of the generation and transmission assets during construction is considered to result in a moderate adverse effect, reduced to minor adverse after secondary/further mitigation. It is stated that the Applicant is committed to exploring options to reduce construction-related emissions and examples are provided of potential measures and that those measures are expected to be included in the relevant final management plans. What does the term 'expected' mean and how can the ExA be confident that the further mitigation is secured and would result in the predicted reduced effect?	The Applicant is committed to reducing the construction stage GHG emissions wherever feasible and will adopt a Greenhouse Gas (GHG) Reduction Strategy to ensure it maximises reasonable opportunities to reduce GHG emissions in line with best practice standards, such as PAS 2080, and aligned with a net zero trajectory balanced with viability of the Project. The Applicant will submit the GHG Reduction Strategy into the Examination at Deadline 4.
Q1.4.2	The Applicant	**Greenhouse Gas Emissions** In [APP-076] Section 2.10.8.2, the net lifetime saving in CO2 emissions for the Mona Offshore Wind Farm Project is stated as -129,466 tCO2e of avoided emissions. • Can you comment on the possibility of the construction emissions being greater than the operational emission saved if the actual generating capacity of the installed turbined was to be less than 1.5GW? • Should the assessment be updated to reflect the uncertainty around the exact generating capacity and the technology to be used for the turbines?	When considering the potential net emissions associated with the Mona Offshore Wind Project, the Applicant has made several conservative assumptions including: • The load factor, 34.9%, used for the assessment is lower than the targeted capacity factor of 58.4% and 63.1% through BEIS and DESNZ Allocation Framework for Round 3 and 4. As such, associated output capacity and operational-avoided emissions are likely to be higher than that stated within the Volume 4, Chapter 2: Climate Change (APP-076), thereby resulting in a greater net lifetime saving of emissions. • The net emissions figure quoted in Q1.4.2 is a conservative worst-case assumption as explained in paragraphs 2.10.6.7-2.10.6.8 of Volume 4, Chapter 2: Climate Change (APP-076). The assessment assumes grid decarbonisation because of renewable generation assets increasing in their contribution to the UK electricity Grid (in line with Policy commitments). The avoided emissions associated with the alternate scenarios (Current UK Grid average, and DESNZ 'non-renewable fuels') represent the higher thresholds around actual avoided emissions as

Reference	Question to	ExQ1	Applicant's response
			detailed in Table 2.18 Volume 4, Chapter 2: Climate Change (APP-076). This upper range represents much higher avoided net emissions. • The construction stage emissions presented are a conservative estimate for GHG emissions, as detailed in Section 2.5.3 Volume 4 Chapter 2: Climate Change (APP-076). Additionally, Mona Offshore Wind Project shall be seeking to reduce its construction stage carbon emissions through a GHG reduction strategy as far as reasonably practicable. Any reduction in construction stage emissions will result in an associated increase in net lifetime avoided emissions. The Applicant does not anticipate or intend to build out the Mona Offshore Wind Project at less than 1.5GW capacity. This is in line with the guidance provided in NPS EN-3 which encourages developers to maximise the capacity of new large-scale energy development within technological, environmental and other constraints (EN-3 paragraph 2.8.2). The Applicant concludes that an updated assessment for higher construction emissions and a different generation capacity would not alter the conclusions around significant effects presented within ES Volume 4, Chapter 2 (APP-076).

2.5 Commercial Fisheries, Fish and Shellfish

Table 2.5: Response to ExQ1: Commercial Fisheries, Fish and Shellfish Questions

Reference	Question to	ExQ1	Applicant's response
Q1.5.1	The Applicant	**Applicant's Response to Written Representation [REP2-078]** The Applicant's response to REP1-075.10 [REP2-078] states that it will commit to maintaining a Scallop Mitigation Zone (SMZ) of 57 km2 by including this commitment within an update to Table 1.2 of the Outline FLCP [APP-199] at Deadline 3. As the size is much smaller in area than what the Scottish Fishermen's Federation, the Scottish Whitefish Producers Association Ltd and the West Coast Sea Products expected can the Applicant: i) summarise the steps it took to evaluate smaller and larger sizes and how a 57 km2 SMZ area size was selected; ii) clarify if rock protection footprint for cables would have an impact on the size of the 57 km2 SMZ; and iii) explain what the effects would be on the Proposed Development if it increased the SMZ by 20- 25% in area size.	Please see the Applicant's response to this question in S_D3_25.4 Appendix to ExQ1 Q1.5.1 Scallop Mitigation Zone.
Q1.5.2	The Applicant	**Applicant's Response to Written Representation [REP2-078]** The Applicant's response to written representations reference REP1-081.4 [REP2-078] states the SMZ covers approximately 37% of scallop grounds located within the Mona Array Area. In its written representation West Coast Sea Products [REP1-081] highlighted that the overall cumulative effect with the proposed Morgan Offshore windfarm would effect 53% of 2023 Queen data. Can you summarise your position regarding: i) the effects of potential loss of revenue on scallop fishery when compared to 2023 queen data, and	i) The Applicant has noted the Written Representation from the West Coast Sea Products (WCSP) (REP1-081) and acknowledges the calculations made with regard to spatial extent of current queen scallop fishing in relation to the Mona Array Area, where WCSP highlighted that the overall cumulative effect with the proposed Morgan Offshore wind Project Generation Assets could affect 53% of activity observed within their 2023 queen scallop data. It is noted that the WCSP's calculations are based on their own plotted data, which is not publicly available, while using the Mona Array Area as presented within the Preliminary Environmental Information Report (PEIR). The calculations therefore do not consider project changes and commitments made post-PEIR, i.e. the reduction in extent of the Mona Array Area from PEIR, from approximately 450 km² to 300 km².

Reference	Question to	ExQ1	Applicant's response
		whether it would change the conclusion of your assessment; and ii) if any further mitigation measures could be added to the Outline Fisheries Liaison and Co-Existence Plan.	The cumulative effects assessment (Volume 2, Chapter 6: Commercial fisheries (APP-058)) considered the potential loss of fishing grounds from Mona Offshore Wind Project, Morgan Offshore Wind Project and Morecambe Offshore Wind Farm during the operational phase and concluded that whilst the cumulative magnitude of impact would have a regional spatial extent, be of long-term duration and continuous, with low reversibility, a minor adverse significance of effect was concluded on the basis that the reduction in access to scallop grounds resulting from the cumulative impact would not lead to more than a 5-10% reduction of the annual value of landings (informed by expert judgement that is based on data analysis, stakeholder feedback, the array layouts presented and how these would affect fishing activity). While the Applicant's response to REP1-081.4 did state that the SMZ covers approximately 37% of queen scallop grounds within the Mona Array Area, it should be noted that the SMZ was defined to fully encompass the most important queen scallop fishing grounds identified by WCSP (as described in Q1.5.1). The currently proposed SMZ seeks to achieve a balance between enabling co-existence with commercial fisheries whilst retaining sufficient space to deliver the Mona Offshore Wind Project. It is important to recognise that fishing will also be permitted in parts of the Mona Array Area that do not lie within the SMZ. Volume 2, Chapter 6: Commercial fisheries (APP-058) and Volume 6, Annex 6.1: Commercial Fisheries Technical Report (APP-097) have acknowledged the significant importance of queen scallop fishing within the Mona Array Area. Paragraph 6.8.2.64 of Volume 2, Chapter 6: Commercial fisheries (APP-058) specifically references the reliance of the 'Scottish west coast scallop' receptor group upon grounds within the Mona Array Area, stating that this may account for approximately 40% of their total annual value of landings of queen scallop within the Mona Array Area alone. This importance of queen scallop landings to the WCSP and other Scottish scallopers, who form the 'Scottish west coast scallop vessel' receptor group, was established through analysis of the latest publicly available Vessel Monitoring System (VMS) data and via extensive engagement that has been conducted since 2021, where the Applicant sought to establish the spatial distribution of the nomadic fleet. In light of the above, the 2023 data provided by WCSP on their spatial distribution of

Reference	Question to	ExQ1	Applicant's response
			queen scallop fishing activity follows a similar general trend and does not differ significantly from previous years' data. As such, the conclusions of our assessment regarding the potential loss of revenue for the scallop fishery remain valid and unchanged. ii) Based on the impact assessment and engagement undertaken with commercial fisheries stakeholders to date, no further mitigation measures are required to be added to the Outline Fisheries Liaison and Coexistence Plan (FLCP) (APP-199). The Applicant has also not received any explicit requests for further commitments through the Written Representations beyond those that fall within the scope of the Outline FLCP. The Applicant has made significant commitments to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as possible, and will continue to constructively engage with the fishing community to ensure concerns are addressed as far as reasonably practicable. Early engagement was established with fisheries stakeholders in June 2021 to understand stakeholder requirements for co-existence as summarised in Table 6.5 of Volume 2, Chapter 6: Commercial fisheries (APP-058) and detailed in Appendix H of the Technical Engagement Plan Appendices - Part 2 (F to M) (APP-042). Engagement will continue through the operations and maintenance phase of the project. A Fisheries Liaison and Co-existence Plan (FLCP) will be developed by the Applicant through ongoing consultation with fisheries stakeholders, which will be based on the Outline FLCP (J13 F02) submitted as part of the Application. Commitments are set out within Volume 2, Chapter 6: Commercial fisheries (APP-058) and the Mitigation and monitoring schedule (J10 F03). The commitments are designed to enable co-existence as far as possible during all project phases. They include commitments to not close the entire development area during the construction phase, the establishment of a SMZ, which will be free of wind turbines and offshore substation platforms (a commitment which is a 'first' for offshore wind in the United Kingdom as far as the Applicant is aware) and the orientation and spacing of infrastructure such that fishing can continue within the Mona Array Area. These design commitments are also supported by the commitment to undertake monitoring of VMS data and landings data from the study area annually for the first five years of the operations and maintenance phase.

Reference	Question to	ExQ1	Applicant's response
			As a result of these measures, commercial fishing receptor groups will be able to continue fishing within parts of the Mona Array Area during construction. During the operations and maintenance phase, the measures will provide the space for continued fishing within the Mona Array Area and allow fishing vessels to transit through the area. Fishing will also be permitted within those parts of the Mona Offshore Cable Corridor where construction activities are not taking place. This will be achieved via the use of rolling advisory exclusion zones of 500 m around the vessel(s) installing export cables. This will avoid the entire Mona Offshore Cable Corridor being closed to fishing vessels during the construction phase. Additionally, the use of 500 m rolling advisory exclusion zones will apply to the installation of inter-array and interconnector cables. The Applicant undertook recent engagement with commercial fisheries stakeholders on the mitigation and monitoring commitments set out within the Outline FLCP (APP-199) in July and September 2024 (captured in minutes during July and September 2024 consultation meetings on the Outline FLCP in parallel with the Mona Examination). Based on the feedback from these meetings, the Applicant has agreed to refine the wording of the commitments within the updated version of the Outline FLCP (J13 F02) which has been submitted for Deadline 3. These refinements specifically address: • Use of gear penetration and snagging risks as factors to determine target burial depth – incorporated into Primary Measure 1 • In response to concerns over the impact of cable protection on fishing activity and the amount of cable protection that can be used, the Applicant has set out the limits on cable protection, as assessed in Volume 2, Chapter 6: Commercial fisheries (APP-058) • The commitment to a minimum spacing of 1,400m between infrastructure has been updated to also make reference to the layout development principles and micrositing in Primary Measure 4 • Feedback highlighted the importance of using a Fishing Industry Representative (FIR) identified by the local fishing industry. The Applicant has amended the justification for Tertiary Measure 3 to note

Reference	Question to	ExQ1	Applicant's response
			that a suitable candidate for the FIR will be identified to the Company Fisheries Liaison Officer (CFLO) by fisheries stakeholders. • Feedback highlighted the importance of using a local Offshore Fisheries Liaison Officers (OFLOs) where possible. Tertiary Measure 4 has been updated by the Applicant to reflect the use of Local OFLOs where possible. • To reduce the potential for cable exposure, Tertiary Measure 10 has been updated to include consideration of likely seabed level change where possible as a factor in establishing target cable burial depth. • The commitment in Tertiary Measure 11 to undertake annual reviews for the first five years of the operations and maintenance phase of Vessel Monitoring System (VMS) data and landings data, will also be updated to include inshore VMS (I-VMS) data when available and engagement with the fishing industry on the results of the monitoring. • Concern raised over the Applicant's position that SMZ boundaries are subject to final engineering design and therefore, the final SMZ could be reduced have been mitigated by the Applicant committing to a minimum area for SMZ of 57 m^2, which is now secured in the updated Mona Outline FLCP (J13 F02). • While the Applicant acknowledges the preference of the WCSP for excluding inter-array cables (or cable protection if/where required) within the SMZ, the option to place cables and cable protection within the SMZ has been retained to ensure an efficient inter-array and transmission system. The Applicant has committed to minimising cable protection as far as practically possible. • Additionally, as part of ongoing efforts, the Applicant has also incorporated a new monitoring commitment in relation to queen scallop, as discussed in Q1.5.4, which has been included in the updated Outline FLCP (J13 F02) and Mitigation and monitoring schedule (J10 F03).
Q1.5.3	The Applicant *NRW(A)* *JNCC*	**ES Chapter 3 (Vol 2) Fish and Shellfish Ecology [APP-055]** There does not appear to be any information on wind turbine sound emissions nor vessels sound emissions	Please see the Applicant's response to this question in S_D3_25.2 Appendix to ExQ1 Q1.5.3 Fish and Shellfish Ecology.

Reference	Question to	ExQ1	Applicant's response
	NWWT	during operation in section 3.9.3. Table 3.6 states that it has been scoped out based on site specific sound information, including modelling of sound emissions from the proposed wind turbines and vessels and effects on fish and shellfish receptors as detailed in section 3.9.3. The Planning Inspectorate did not agree that operational noise of the OWF can be scoped out of the Environmental Statement. Can the Applicant provide the information stated in Table 3.6 on wind turbine sound emissions and vessels; and Can respective parties advise if they have any concerns regarding potential underwater sound during the operational phase impacting fish and shellfish receptors.	
Q1.5.4	The Applicant	**Monitoring** NPS EN-3 requires Applicants to develop an ecological monitoring programme to monitor impacts during the pre-construction, construction and operational phases to identify the actual impacts caused by the project and compare them to what was predicted in the EIA/HRA. Can the Applicant summarise how it has met this requirement for Scallops?	Mona Offshore Wind Project has committed to undertaking monitoring for queen scallop; high level details of this commitment are outlined within the Outline Fisheries Liaison and Coexistence Plan (J13 F02), and Mitigation and Monitoring Schedule (J10 F03), as updated at Deadline 3. The Offshore In-Principle Monitoring Plan (APP-201) will be updated at Deadline 4 to include this commitment. The approach to monitoring will be fully developed post-consent to encompass pre- and post-construction monitoring, for up to five years post-construction, with the application of adaptive management based upon annual monitoring results. Commercial fisheries stakeholders, including the Isle of Man Government were informed of this commitment during consultation meetings in September 2024, with positive feedback.

2.6 Compulsory Acquisition (CA) and Temporary Possession (TP)

Table 2.6: Response to ExQ1: Compulsory Acquisition and Temporary Possession Questions

Reference	Question to	ExQ1	Applicant's response
Q1.6.1	The Applicant	**BoR** Are you satisfied that that the address given in the BoR [REP2-008] for Hefin Williams [RR-026] is correct?	Dalcour Maclaren on behalf of the Applicant confirmed the address of Hefin Williams through a Land Interest Questionnaire in July 2023 and again through the Confirmation Schedule in January 2024 that the address in the book of reference is correct.
Q1.6.7	The Applicant	**Category 3 persons** At Section 11 b of the BoR [REP2-008] you explain the rationale for listing "Category 3" persons in Part 2 thereof. Can you: • either signpost or explain the methodology you used in identifying such persons? and • explain why the owners of Tyddyn Meredydd, Cefn, St Asaph and Cae Llywd, Cefn, St Asaph were included but not that of Pentre Meredydd, which is located between the two?	Category 3 persons include those who may have: (a) a relevant claim for compensation under Part 1 of the Land Compensation Act 1973, compensation for depreciation of land value by physical factors caused by the use of the Project. These include: • Noise • Vibration • Smell • Fumes • Smoke • Artificial lighting • Discharge of any solid or liquid substance onto land (b) a relevant claim for compensation for injurious affection during construction and operation of the Project, including persons with potentially affected / interference with rights of access under section 10 of the Compulsory Purchase Act 1965 and/ or section 152(3) of the Planning Act 2008. The Applicant applied a multidisciplinary and precautionary approach to the identification of potential Category 3 persons. This involved input from the Applicant's land agents Dalcour Maclaren, environmental consultants and the Mona project team. As part of this identification process, the respective subject matter experts combined to: i. confirm what could constitute a relevant claim; ii. advise on matters arising from the construction or operation of the project which may give rise to a claim;

Reference	Question to	ExQ1	Applicant's response
			iii. undertake due diligence on properties where it was perceived a claim could possibly be made; and iv. identify the properties potentially impacted and the likelihood of success of any claims. The Applicant determined that noise impacts typically have a wider geographical effect than any of the other physical factors identified in Part 1 of the Land Compensation Act 1973, and any properties potentially experiencing such effects would capture and exceed any disturbance caused by other factors. The Applicant applied a quantitative approach to identification based on noise modelling data, which identified potential noise receptor locations that could be affected by noise from the works (on the basis of the assessment of impacts of low, moderate and major magnitude taking account of proposed mitigation). In addition to this quantitative assessment, a qualitative assessment was undertaken to review the list of potential claimants and reduce the land referencing limits to include only those properties that the Applicant believes would or might be able to make a relevant claim, as defined by section 44 and section 57 of the Planning Act. This assessment considered the type and nature of activities occurring at each location, the natural topography and landscape that may increase or decrease the impact of nearby residences such as hills, valleys and trees, along with the proposed engineering methods and duration. The Applicant understands that the building Pentre Meredydd is a redundant farm building that is located within HMLR title CYM568240. Site visits have been undertaken to substantiate the use of the building along with engagement with the agent on behalf of Lois Williams. To date, no further information or evidence has been provided that supports an interest in the land which differs from the HMLR title documents. The freeholder owners of title CYM568240 are a Category 1 interest, they should not therefore be duplicated as a Category 3 interest.
Q1.6.8	The Applicant	**Alternative Dispute Resolution (ADR)** Paragraphs 27 and 28 of 'Planning Act 2008 Guidance related to procedures for the compulsory acquisition of	It is noted that the Planning Act 2008 Guidance related to procedures for the compulsory acquisition of land', September 2013, Department for Communities and Local Government (DCLG) refers to the use of ADR

Reference	Question to	ExQ1	Applicant's response
		land', September 2013, Department for Communities and Local Government (DCLG), state that applicants are urged to consider offering full access to ADR techniques for those with concerns about CA of their land. Have you done so or considered other means of involving those affected? If so, give details.	techniques in paragraphs 27 and 28. The Guidance also includes reference to other recommended steps which Applicants should consider during the pre-application phase and other means of involving those affected. This includes reference to statutory requirements around pre-application consultation and other early, informal consultation with those who may be or are affected owners. As demonstrated in the Consultation Report (Document Reference APP-037) the Applicant has satisfied the consultation requirements and undertaken a number of informal consultation processes, including with affected owners. The Guidance further includes reference to seeking to acquire land by negotiation. As demonstrated in the Consultation Report (Document Reference APP-037) (for example section 7) the Applicant undertook extensive consultation and engagement with affected landowners prior to the DCO application being made and as described in the Land Rights Tracker (Document Reference S_PD_5 F05) the Applicant continues to meaningfully engage with affected owners to agree voluntary agreements and will continue ongoing engagement. Together, the Applicant's efforts in relation to consultation and engagement on voluntary agreements have provided affected owners with means of engaging with the application process and overall have met the expectations of the Guidance without the need to engage with ADR techniques. In the event of a dispute arising and if the circumstances indicate it would be the most appropriate method of resolving that dispute, the Applicant would be willing to engage in ADR.
Q1.6.9	The Applicant	**Alternatives** In light of the DCLG guidance, in particular paragraph 8, can you: • Advise how the Secretary of State can be assured that all reasonable alternatives to CA (including modifications to the scheme) have been explored; and	As set out in the Statement of Reasons (Document Reference APP-029) and the Applicant's Response to s51 Advice - Site Selection and Consideration of Alternatives (Document Reference AS-016), the Applicant has followed a staged site selection and design iteration process from inception to the point of submission of the application for development consent to identify the most suitable locations and configuration. Wherever possible and practicable, the Applicant has sought to accommodate preferences and concerns raised by stakeholders through the site

Reference	Question to	ExQ1	Applicant's response
		Set out in summary form, with document references where appropriate, what assessment / comparison has been made of the alternatives to the proposed acquisition of land or interests in each case.	selection process whether by adjustments to the development boundary, areas of works, or designs being considered, with examples of this regard to stakeholder comments set out in the Environmental Statement. Furthermore, the site selection process and alternatives considered have been through a process of detailed analysis of environmental, social, and engineering constraints, with key feasible alternatives taken forward for consultation. Extensive consultation was undertaken, as well as engagement with the wider public. This has also helped to ensure that the Order Land comprises the smallest area necessary to deliver the Mona Offshore Windfarm Project (as confirmed at paragraph 1.6.1.11 of the Statement of Reasons). Furthermore, through consultation, its site selection procedures and design refinement, the Applicant has sought to minimise the impact on those affected by the Mona Offshore Wind Project, including those who will be affected by the use of compulsory acquisition powers (paragraph 1.6.1.13 of the Statement of Reasons). As noted in paragraph 25 of the Guidance, "*Where proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear Schedule) it may not always be practicable to acquire by agreement each plot of land*". Mona is one such project and for this reason, compulsory acquisition powers have been included in the development consent order on a precautionary basis, to secure all of the interests in land necessary to develop the Mona Offshore Wind Project within a reasonable timeframe. This is to ensure that the Project can be delivered in the event that all necessary interests in the land cannot be secured by agreement, the landowner or occupier defaults on that agreement or where unknown interests in the land emerge. Further details are set out in the Statement of Reasons (APP-029). This also confirms that an important consideration of the site selection process and location for the Mona Offshore Wind Project was the objective of minimising the need for the compulsory acquisition of interests in land and the extent of that acquisition or interference with the rights of others.

Reference	Question to	ExQ1	Applicant's response
			As confirmed in the Statement of Reasons (Document Reference AP-029), the Applicant has proportionately limited the powers sought, relying on temporary possession to construct the majority of the development (excluding the Onshore Substation), so as to ensure that permanent rights will only be taken over the land needed to protect the cables, to maintain ecological mitigation works and for operational access. This therefore mitigates impacts on affected persons. The Statement of Reasons also clearly sets out the package of rights needed for each plot, thereby justifying the case and need for compulsory acquisition. Negotiations with affected parties are ongoing and are summarised in Section 1.9 of the Statement of Reasons, which confirms that all persons with an interest in the Order Land were consulted, the Applicant, through its agents Dalcour Maclaren, has engaged relevant landowners and occupiers in negotiations to secure the necessary interests in land required by voluntary agreement in accordance with the requirement of paragraph 25 of the Guidance. However, in order to give the Applicant and the Secretary of State certainty that all of the necessary land will be secured within a reasonable timeframe, powers of compulsory acquisition are sought as a fallback measure. This approach is endorsed by paragraph 25 of the Guidance. Negotiations with landowners will continue, but as outlined above, without powers of compulsory acquisition, it may not be possible for the Applicant to secure all of the interests in land necessary to develop the Mona Offshore Wind Project within a reasonable timeframe and the inclusion of compulsory acquisition powers offers certainty against this risk. There is clear national and local policy support for the development of the Mona Offshore Wind Project and the use of compulsory acquisition powers would be a proportionate and legitimate means of securing the necessary interests in land where they cannot be acquired through voluntary agreement.
Q1.6.11	The Applicant	**Temporary possession** Section 1.10.1.19 of the SoR [APP-029] says that temporary possession powers apply to all of the Order Land: • How does the dDCO provide for this? The Annotation on the Land Plan (Onshore) is consistent with this statement but seemingly at odds with Table 1 of	The draft Development Consent Order (Document Reference AS-010), at Article 29 sets out rights in respect of temporary use of land for carrying out the authorised development. Article 29(1)(a)(i) allows for "The undertaker… in connection with the carrying out of the authorised project [to] enter on and take temporary possession of the land specified in column (1) of Schedule 7". In addition

Reference	Question to	ExQ1	Applicant's response
		the Book of Reference [AS-015] where temporary possession / occupation is not mentioned in respect of the rows relating to land coloured Pink, Blue and Green on the Land Plans. Given that, by virtue of Schedule 15 of the dDCO [REP2-004] both documents are to be certified, can you reconcile this apparent inconsistency?	to this, Article 29(1)(a)(ii) allows for "The undertaker… in connection with the carrying out of the authorised project [to] enter on and take temporary possession of any other Order land" provided no notices of entry or general vesting declarations have been served in relation to that land. Together these provisions provide for the undertaker to take temporary possession or land within Schedule 7 and all other land within the Order limits (subject to the caveat noted above). The Land Plans show the highest class of rights that could apply to each plot, with the pink plots covering all interests and rights in land (including temporary), the blue plots permanent rights (and where necessary a right to impose restrictive covenants), the green plots show hedgerow enhancement rights (and where necessary a right to impose restrictive covenants). These plots all include rights of temporary possession, whereas the yellow plots are temporary only. Table 1 of the Book of Reference (Document Reference D4 F05) has been updated to refer to "Land Subject to Temporary Occupation and Use and Acquisition of Permanent Rights" in relation to blue land, "Land Subject to Temporary Occupation and Use and Acquisition of Permanent Rights - Hedgerow Enhancement" in relation to green land and "Land Subject to Temporary Occupation and Use and Freehold Acquisition" in relation to pink land to align with the land plans (onshore) (Document Reference AS-005).
Q1.6.12	The Applicant	**Clarification** In the SoR [APP-029] you say at paragraph 1.11.1.18 that: 'Permanent access rights to access the cable corridor are sought over Plots [xx].' Can you address this omission.	The Applicant has provided an updated Statement of Reasons (SoR) at Deadline 3 (D3 F02) to address this question.
Q1.6.14	The Applicant *CCBC* *DCC*	**Open Space** Notwithstanding the conclusion at paragraph 1.11.1.20 of the SoR [APP-029], is the Proposed Development consistent with s132(3) of PA2008 given: • The length of time during which the Open Space at Pensarn/Abergele Beach, shown on the Special Category Land Plan [AS-007], could be subject to TP:	

Reference	Question to	ExQ1	Applicant's response
		• The potential for conflict between its proposed use and movements by visiting motorists, pedestrians and cyclists using the informal parking area, beach, promenade, cycle and coast paths; and The proposed fencing of Plot 01-003, the uses subject of Work No.7 and further associated development set out in Schedule 1, Part 1 of the dDCO [REP2-004].	
Q1.6.15	The Applicant	**Gwrych Castle** At paragraph 1.11.1.6 of the SoR [APP-029] reference was made to further survey work during the pre-Application period on Welsh Government land and to on-going negotiations in respect of land rights required over operational and non-operational extents of the A55 and an area of woodland at Gwrych Castle. What progress has been made on those outstanding matters and do you envisage the need for any associated change to the Application in respect of land rights?	The Applicant can confirm that the survey work referenced at paragraph 1.11.1.6 of the SoR [APP-029] was successfully undertaken in April 2024. In relation to the land rights required over the operational and non-operational extents of the A55, the Applicant refers to the Land Rights Tracker (S_PD_05 F05) for the latest update on negotiations with the Welsh Ministers. Dalcour Maclaren on behalf of the Applicant have been negotiating with the agent representing the freeholder of Gwrych Castle. The heads of terms for the land rights sought have been recommended for signing by their land agent and the Applicant is hopeful that heads of terms negotiations will conclude shortly. Dalcour Maclaren on behalf of the Applicant have been engaging with Natural Resources Wales (NRW) (as occupier of the woodland) to obtain an occupier's consent for the land rights sought. NRWs professional representatives have been reviewing the occupier's consent document and the Applicant's appointed agent has prompted for a response and are hopeful the heads of terms for a voluntary agreement will be concluded in the coming weeks.
Q1.6.22	The Applicant	**Enabling Works** In your Response to Written Submissions made at Procedural Deadline ([REP1-011], page 31) you referred to possible mitigation works to reduce disturbance to farming practices; how would these be secured through the dDCO?	The mitigation measures referred to in PDA-048.17 (REP1-011) will be bespoke depending on the type of farming practices undertaken by individual landowners and occupiers. It will be the role of the Agricultural Liaison Officer (ALO) to engage with landowners and occupiers to discuss practical matters on site so that farming operations can continue as far as reasonably practicable. The ALO is secured through the Outline Code of

Reference	Question to	ExQ1	Applicant's response
			Construction Practice (REP2-038, paragraphs 1.6.1.9 and 1.6.1.10) and will be appointed prior to the commencement of onshore site preparation works to ensure appropriate measures to reduce disturbance to farming practices are in place for all stages of work. Examples of measures which may be implemented to reduce disturbance to farming practices include providing gated crossings at points along the onshore cable corridor, as described in section 1.6.4 of the Outline Fencing Management Plan (REP2-048).
Q1.6.26	*Tan-y-Mynydd Trout Fishery* The Applicant	**Alternative route** In the WR [REP1-080] mention is made of the 'alternative route to the immediate North of the fishery'. With reference to the relevant documents in the Examination Library, please signpost where this was identified and considered.	The 'alternative route to the immediate North of the fishery' (in relation to the Tan-y-Mynydd Trout Fishery) is identified as Section 3N within Figure 1.5 of Volume 5, Annex 4.2: Site Selection BRAG Report of the Environmental Statement (APP-082). Section 3N is also considered within Table 1.3 of APP-082. This proposed section of the onshore cable route was considered as an option to avoid the high pressure gas main and overhead lines that run immediately south of Glascoed Road. Alternative routes were proposed north and south. The southern option (Section 3S) was selected over the northern option (Section 3N) for a number of factors which are outlined in Table 1.3 and explained in more detail below. The factors that led to the choice of section 3S were: the landscape and ecological features along the western extent of Section 3N (such as mature trees, woodland blocks and connecting hedgerows with potential habitat for bats and dormice) that would have resulted in habitat loss and fragmentation if an onshore cable route haul road was established during construction; and engineering feasibility associated with a high risk crossing (the high pressure gas main) and a number of moderate risk crossings (including a number of trenchless techniques to potentially avoid ecological / landscape features). The Tan-y-Mynydd Trout Fishery is referenced in the BRAG of section 3N in relation to flood zones in the area near the trout fishery. Flood zones

Reference	Question to	ExQ1	Applicant's response
			represent an engineering feasibility concern as they restrict windows for construction due to potential flooding. The BRAG of section 3N also identifies avoiding general proximity to the trout fishery in relation to potential impacts on the groundwater fed lakes. All of the factors outlined above in relation to Section 3N were attributed a Red in the Black-Red-Amber-Green (BRAG) scoring. Comparatively, Section 3S had fewer potential impacts associated with ecology and landscape (and avoided the flood zones around the trout fishery). As a result, Section 3S was selected as the more suitable option for the onshore cable route in this area.
Q1.6.28	*G Lloyd Evans & Sons* *The Applicant*	***Alternatives*** *The written submission [REP2-103] refers to 2 proposed routes put forward in 2022, that are referred to as 'the northern route' and 'the southern route'. With reference to the relevant documents in the Examination Library, please signpost where:* • *these were identified and considered; and* *alternative potential construction methods evaluated.*	The Applicant refers to Figure 1.5: Onshore Cable Route Option Locations (Section 7N and 7S) in the Site Selection BRAG Report (APP-082). This figure shows the two onshore cable route options that were considered at this location. Table 1.3 of the same document provides the BRAG assessment for the two options. This assessment considered the use of trenchless techniques, the accommodation of a haul road, and directing open cut trenches in gaps between existing trees. The Applicant also refers to para 1.4.2.5 of APP-082 which provides the summary on why Section 7N was discounted.

2.7 Draft Development Consent Order (dDCO)

Table 2.7: Response to ExQ1: Draft Development Consent Order (dDCO) Questions

Reference	Question to	ExQ1	Applicant's response
Q1.7.1	The Applicant	**Article 8** In line with section 5.11.25 of NSIP Advice Note 15: Drafting DCOs, provide clear justification within the EM for the inclusion of such provisions in the particular circumstances, including whether the views of any relevant authority or government department have been sought. Article 8(a) and (c) both require consent from the regulator in line with s150 of the PA2008. Can you confirm that this consent has been obtained?	The Applicant is in communications with the local authorities in relation to the disapplications set out in Article 8 of the Draft DCO and intends to confirm consent to those disapplications through the statement of common ground process. The Applicant is seeking further information from the local authorities regarding their concerns with the disapplications and a route to resolve those.
Q1.7.2	The Applicant	**Articles 29(2) and 30(3)** In your Response to Relevant Representations [PDA-008] you expressed a commitment to give 3 months' written notice of work on their land to APs within the Heads of Terms of voluntary agreement. Do you intend to make the correspondent amendment to Articles 29 and 30 of the dDCO [REP2-004]? If not, please give reasons for your answer.	The Applicant does not intend to make an amendment to the requirement under Articles 29 and 30 of the dDCO to provide not less than 28 days before entering on and taking temporary possession of land. The 28-day requirement is a sufficient period of advanced notice and is a well-established precedent in offshore wind DCOs. The Applicant and individual landowners may decide to agree different time periods for different activities in any voluntary agreement.
Q1.7.3	The Applicant	**Design parameters in ES Chapter 3 and Tables 2 and 4 of the dDCO (Sch 2)** There are some inconsistencies between the ES and Tables 2 and 4 of Sch 2: • ES Table 3.1 identifies the maximum lengths of the offshore inter-array cables and interconnector cables as 325km and 50km, respectively. They are shown as such in dDCO Sch 14 Table 4 and also as a combined total figure (375km). However, in dDCO Sch 2 Table 2 the two parameters are shown only as a combined total (375km); • the maximum number of inter-array (67) and interconnector cable crossings (10) are set out as separate figures in the ES (Tables 3.19 and 3.25,	The Applicant has considered the issues identified and confirms the following, so as to ensure consistency between the application documentation: • An update will be made at Deadline 4 to draft development consent order (Document Reference REP2-004) (Draft DCO) Schedule 2 Table 2, to include the two individual parameters (offshore inter-array cables and interconnector cables as 325km and 50km, respectively), so as to ensure consistency with ES Table 3.1 and Draft DCO Schedule 14 Table 4. • An update will be made at Deadline 4 to Draft DCO Schedule 2 Table 2 and Schedule 14 Table 4 to include the separate figures for the inter-array (67) and interconnector cable crossings (10), so as to ensure consistency with the ES (Tables 3.19 and 3.25, respectively).

Reference	Question to	ExQ1	Applicant's response
		respectively). Only a combined total (77) is shown in dDCO Sch 2 Table 2 and Sch 14 Table 4; • dDCO Table 2 identifies the maximum number of offshore export cable crossings as 14, however this is shown as 24 in ES Table 3.22; • dDCO Sch 2 R6(3)(b) provides, in respect of the onshore substation, that the highest part of any external electrical equipment (excluding lightning rods) must not exceed 12.5m above finished ground level and R6(3)(d) specifies that the total number of lightning rods within the fenced compound must not exceed 12m. These parameters are not set out in ES Ch 3 although other substation parameters are reflected therein (Table 3.34). Para 3.6.2.1 of the Design Principles document is consistent with the dDCO in respect of the lightning rods, however it identifies a 15m maximum height for the electrical equipment. Can the Applicant correct or explain the inconsistencies?	• The correct number of cable crossings is 24. This was corrected in the Project Description, please see S_PD_1 Errata Sheet F03 (Document reference REP2-090). Therefore, no changes are proposed. • To clarify, Schedule 2 R6(3)(d) of the Draft DCO specifies that the total number of lightning rods within the fenced compound must not exceed 12 and the height of any lightning rod must not exceed 30 metres above finished ground level (rather than 12m which is incorrectly referenced in the query). On this basis, this is consistent with paragraph 3.6.2.1 of the Design Principles document and so will remain unchanged. The parameter for external electrical equipment (excluding lightning rods) of 12.5 m, set out at Draft DCO Schedule 2 R6(3)(b), is correct. The Design Principles (REP2-026) will be updated to reflect this (replacing the value of 15 m currently stated) at a future Deadline.
Q1.7.4	The Applicant	**Deemed Marine Licence** Part 2 Condition 18(1)(d)(i)(bb) of the DML [REP2-004] states that a cable burial risk assessment will identify if there is >5% reduction in navigable depth. It refers to consultation with MCA and Trinity House. Table 1.13 of the Stage 2 SAC Report [APP-032] states that approval for any such navigable depth reduction is required. Does the DML wording need to be updated to reflect this?	Condition 18(1)(d) of Part 2, Schedule 14 of the draft development consent order (Document Reference REP2-004) (Draft DCO) requires the undertaker to submit an offshore construction method statement to the licensing authority prior to commencement of the authorised scheme. This offshore construction method statement will contain details of cable specification, installation and monitoring including (as specified by Condition 18(1)(d)(i)(bb)) a detailed cable specification and installation plan (CSIP) for the authorised scheme. This CSIP will incorporate a cable burial risk assessment encompassing the identification of any cable protection that exceeds 5 percent of navigable depth. In the event that any area of cable protection does exceed 5 percent of navigable depth, details of what measures will be taken to ensure existing and future safe navigation will be identified. As set out in 18(1)(d)(i)(bb), this process would involve consultation with the MCA and Trinity House. The approval of the offshore construction method statement from the licensing authority is required and would not be forthcoming in the event there was a reduction of navigable depth that exceeds 5 percent unless through consultation with the MCA and Trinity House it was confirmed

Reference	Question to	ExQ1	Applicant's response
			there would be no compromising of safe navigation. As the requirement to obtain approval is prior to commencement, the undertaker could not commence works until that approval is obtained. This effectively places a maximum reduction of 5% of navigable depth on the cable construction unless approval is otherwise obtained. For the above reasons, the condition drafting is appropriate, and no changes are proposed.
Q1.7.5	The Applicant	**Deemed Marine Licence** Tables 1.84 and 1.152 of [APP-032] state that a Marine Mammal Mitigation Protocol and an Underwater Sound Management Strategy are proposed to secure measures for injurious effects and disturbance from piling, unexploded ordnance (UXO) clearance and some geophysical activities. These are to be secured in the dDCO [REP2-004] through Part 2 Condition 18(1)(hi) and Part 2 Condition 20, respectively; however, neither Condition refers to geophysical activities. Can the Applicant amend the conditions accordingly?	Tables 1.84 and 1.152 of the Stage 2 SAC Report (APP-032) refer to the marine management mitigation protocol (MMMP) as a document which will secure mitigation for geophysical activities. There is no reference to the Underwater Sound Management Strategy. The Applicant will update the deemed marine licence drafting in the draft development consent order at Deadline 4 to secure the approval of an MMMP for geophysical activities.

2.8 Habitats Regulations Assessment

Table 2.8: Response to ExQ1: Habitats Regulations Assessment Questions

Reference	Question to	ExQ1	Applicant's response
Q1.10.1	The Applicant	**Isle of Man Ramsar sites** Can the Applicant confirm whether any consideration has been given to the potential for effects on the following Isle of Man Ramsar sites (potential and listed) and the conclusions in this regard? • Ballaugh Curragh Ramsar • Central Valley Curragh proposed Ramsar • Dalby Peatlands proposed Ramsar • Gob ny Rona, Maughold Head and Port Cornaa proposed Ramsar • Southern Coasts and Calf of Man proposed Ramsar • The Eyres proposed Ramsar Bullet.	The process for identifying relevant European sites for consideration in the Habitats Regulations Assessment (HRA) Stage 1 Screening Report (REP2-012) involved a review of the sites listed on the JNCC's data hub, in addition to Natural England, NatureScot and NRW open data sites. With regards to protected sites on the Isle of Man, the Applicant used the maps data provided on the official Isle of Man Government website (https://www.gov.im/maps/). The Applicant consulted on the scope of the HRA throughout the pre-application phase via the Evidence Plan Steering Group and Expert Working Groups (EWGs) which resulted in updates to features, sites or impacts being included in the HRA Stage 2 ISAA Part 2: Special Areas of Conservation (SACs) Assessments (APP-032) and HRA Part 3: Special Protection Areas (SPAs) and Ramsar sites Assessments (REP2-010). The Applicant also consulted on the scope of the HRA during the Section 42 consultation. The results of this consultation are detailed in the Consultation Report Appendices - Part 3 (D.25 to F) (APP040) and as a result of feedback received from NRW, several Welsh onshore ornithological sites were added and considered within the HRA Part 3: SPAs and Ramsar sites Assessments (REP2-010). The Applicant can confirm that the Ballaugh Curragh Ramsar was considered in the pre-screening of sites but was screened out from further consideration at this initial pre-screening stage on the basis that there is no potential for a receptor-impact pathway for any of the features of the Ramsar site (i.e., peatlands, corncrake *Crex crex*, the asilid fly *Epitryptus cowini* and hen harrier *Circus cyaneus*). With regards to the five proposed Ramsar sites listed by the ExA on the Isle of Man, the Applicant notes that these sites are not included in the maps data provided on the official Isle of Man Government website (https://www.gov.im/maps/). The only reference that the Applicant is aware

Reference	Question to	ExQ1	Applicant's response
			of relating to these sites is in the UK Overseas Territories Conservation Forum (UKOTCF) (2005a) review of existing and potential Ramsar sites in UK Overseas Territories and Crown Dependencies and associated Annex 2 of draft Ramsar Information Sheets (UKOTCF, 2005b). As explained in the Consultation Report (APP-037) and the SoCG between Mona Offshore Wind Project and the Isle of Man Government submitted at Deadline 1 (Mona and Isle of Man Government – Territorial Sea Committee SoCG (REP1-024)), the Isle of Man Government was consulted throughout the pre-application phase of the Mona Offshore Wind Project and were active participants in the Benthic, Fish and Shellfish and Physical Processes EWG and the Offshore Ornithology EWG. Throughout the pre-application consultation, including the Section 42 consultation responses, the Isle of Man Government requested consideration of the Isle of Man Government Marine Nature Reserves (MNRs) in the Environmental Impact Assessment (EIA). At no point during pre-application consultation, or in its Relevant Representation (RR-018), did the Isle of Man Government raise the five proposed Ramsar sites to the Applicant, nor request consideration of these in the HRA Stage 1 Screening Report (REP2-012). The Applicant has, therefore, focussed on the Isle of Man MNRs in the EIA. With regards to the Central Valley Curragh proposed Ramsar and the Dalby Peatlands proposed Ramsar, the Applicant notes that there is no potential for a receptor-impact pathway for any of the features of the Central Valley Curragh proposed Ramsar (i.e., shrub-dominated riverside curraghs) or the Dalby Peatlands Ramsar site (i.e., heath and bog habitat) and so these sites would have been screened out from further consideration. The Applicant notes that the Isle of Man MNRs, which were designated in 2018, provide coverage of most of the coastline of the Isle of Man, including the areas proposed to be covered by the Gob ny Rona, Maughold Head and Port Cornaa proposed Ramsar, the Southern Coasts and Calf of Man proposed Ramsar and The Ayres proposed Ramsar. The Applicant also notes that the proposed features of these three proposed Ramsar sites are now designated under the Isle of Man MNRs. The

Reference	Question to	ExQ1	Applicant's response
			Applicant has given due consideration to the potential for impacts to features of the Isle of Man MNRs, as identified as priorities by the Isle of Man Government, in the EIA.
Q1.10.2	The Applicant *NRW (A)* *JNCC*	**Screening** Can the Applicant provide further reasoning to its statement that 'the likelihood of the Mona Array Area resulting in barrier effects for qualifying features of SPAs are low' (paragraph 1.4.6.25 of [REP2-012]. *Does NRW (A) and JNCC agree with the Applicant's statement and that barrier effects can be screened out?*	The Statement of Common Ground (SoCG) between Mona Offshore Wind Project and the JNCC submitted at Deadline 1 (Initial SoCG between Mona and Joint Nature Conservation Committee SoCG (REP1-028)) and NRW (Initial SoCG between Mona and Natural Resource Wales (Advisory) - Offshore (REP1-025)) confirms that the JNCC and NRW(A) agree with the screening of impacts for the HRA for offshore ornithology. The likelihood of the Mona Array Area resulting in barrier effects for qualifying features of SPAs was considered to be low because of the large foraging ranges used by seabirds and the large distances from the Mona Array Area at which the SPAs are located (paragraph 1.4.6.25 of HRA Stage 1 Screening Report (REP2-012). Any additional flight cost associated with avoidance of the wind farm during migration or commute between breeding grounds and foraging grounds would result in a very negligible increase in energy expenditure. The Applicant wishes to highlight that NatureScot (2023) identifies that the assessment of disturbance and displacement at offshore wind farms includes an element of barrier effect impact. Disturbance and displacement is considered in the HRA Stage 1 Screening Report (REP2-012) and in the HRA Stage 2 ISAA Part Three: Special Protection Areas and Ramsar sites Assessments (REP2-010).
Q1.10.3	The Applicant *NRW (A)* *JNCC*	**Screening** The ExA notes the Applicant's commitment to assessing in-combination effects where no LSE from the project alone has been concluded in section 1.4 of the HRA Stage 1 Screening Report [REP2-012]. Can the Applicant provide such an assessment, where this has not been done within the HRA and identify the projects or plans considered.	The Applicant would highlight that a highly precautionary approach has been adopted for the screening of European sites for the Mona Offshore Wind Project in the HRA Stage 1 Screening Report (REP2-012). For example, for breeding birds, all sites and features where mortalities associated with collision or displacement are predicted to be more than zero (>0.0 (rounded to one decimal place)) have been screened in for further assessment in the HRA Stage 2 ISAA Part Three: Special Protection Areas and Ramsar sites Assessments (REP2-010). Also, for marine mammals, the OSPAR Region III Interim Management Unit (MU)

Reference	Question to	ExQ1	Applicant's response
		Does NRW (A) and JNCC consider that there is the potential for an in-combination LSE for any site/feature where the Applicant has excluded a LSE from the project alone?	was considered in the screening of sites for grey seal, as requested by NRW (A). The Applicant notes that the Statement of Common Ground (SoCG) between Mona Offshore Wind Project and NRW (A) submitted at Deadline 1 (Initial SOCG between Mona and NRW(A) - Offshore (REP1-025)) and the initial SoCG between Mona Offshore Wind Project and the Joint Nature Conservation Committee (JNCC) submitted at Deadline 1 (REP1-028), confirms that NRW (A) and JNCC are in agreement with the approach used for determining Likely Significant Effects (LSE) on European sites. The LSE test requires consideration of the Mona Offshore Wind Project alone and in-combination with other plans and projects. Therefore, it is not necessary at the LSE stage to consider sites/features for which an LSE 'alone' has already been identified, as in-combination effects will be considered in the Appropriate Assessment. The LSE in-combination test in the HRA Stage 1 Screening Report (REP2-012) therefore focussed on sites/features for which no LSE alone was concluded, but there is potential for an LSE in-combination with other plans and projects (e.g. where contributions are made by one or more external projects as well as the Mona Offshore Wind Project). Given the highly precautionary approach to the screening of the Mona Offshore Wind Project alone, the Applicant has concluded that no additional LSEs on any European sites or features would be identified as a result of considering the Mona Offshore Wind Project in-combination with any other plans and projects. In light of this, the Applicant does not consider there to be a need to provide any further in-combination LSE assessment beyond that which has already been provided in the HRA Stage 1 Screening Report (REP2-012).
Q1.10.4	The Applicant	**Screening** Can the Applicant confirm that it has consulted with relevant nature conservation advisers for SPAs in Irish and Scottish waters and UK Marine Protected Area (MPA) that are screened for which a LSE has been identified.	The Applicant confirms that consultation with all relevant nature conservation advisers for SPAs in Irish and Scottish waters and UK Marine Protected Area (MPA) (Section D.4, E3.1 Consultation Report Appendices - Part 2 (D to D.24) (APP-039)) has been undertaken for the Mona Offshore Wind Project. The Applicant notes NatureScot and the Department of Agriculture, Environment and Rural Affairs (Northern Ireland) have been assigned 'Other Persons' status in the examination of the Mona Offshore Wind Project. The Applicant also notes that the Examining Authority invited

Reference	Question to	ExQ1	Applicant's response
			NatureScot and the Department of Agriculture, Environment and Rural Affairs (Northern Ireland) as 'Other Persons' to the Preliminary Meeting (which was held on 16 July 2024) for the Mona Offshore Wind Project examination, which neither party attended. NatureScot, National Parks & Wildlife Service (NPWS) and the Department of Agriculture, Environment and Rural Affairs (Northern Ireland) were included in the statutory section 47 consultation (Section D.4, E3.1 Consultation Report Appendices - Part 2 (D to D.24) (APP-039)) for the Mona Offshore Wind Project in June 2023 but did not provide a response. The Republic of Ireland responded to the Planning Inspectorate's Regulation 32 notification (Section D.24.3 of Consultation Report Appendices - Part 2 (D to D.24) (APP-039)) on 19 December 2022. The Republic of Ireland accepted the Applicant's invitation to participate in the transboundary EIA consultation procedure in relation to the proposed development. It is standard practice within the industry to consult with wider stakeholders which may have jurisdiction over the sites potentially affected by the development.
Q1.10.5	The Applicant *NRW(A)*	**Conservation objectives** The Stage 2 SAC Report [APP-032] notes that condition assessments are not available for a number of SACs. Can the Applicant and NRW(A) confirm whether condition assessments have since become available/ are likely to become available during the course of the examination for any of the following: • River Derwent and Bassenthwaite Lake SAC • Solway Firth SAC • North Anglesey Marine/Gogledd Môn Forol SAC • North Channel SAC • Murlough SAC	The Applicant is not aware that condition assessments for any of the Annex II marine mammal or diadromous fish features of the SACs listed in the ExA's question have become available since the submission of the development consent order application for the Mona Offshore Wind Project.

Reference	Question to	ExQ1	Applicant's response
		• The Maidens SAC • Bristol Channel Approaches/Dynesfeydd Môr Hafren SAC • Lundy SAC • Isles of Scilly Complex SAC	
Q1.10.6	The Applicant	**Conservation Objectives** The ExA will be considering the potential for adverse effects on European sites in light of their conservation objectives. Can the Applicant provide conservation objectives for all European sites for which a Likely Significant Effect has been identified.	The Applicant has responded at Deadline 3 in Appendix to ExQ1 Q1.10.6 Part A, Conservation objectives for SACs screened in for Likely Significant Effects (S_D3_25.5) for the conservation objectives for SACs for which a likely significant effect was identified and Appendix to ExQ1 Q1.10.6 Part B, Conservation objectives for SPAs screen in for Likely Significant Effects (S_D3_25.6) for the conservation objectives for SPAs for which a likely significant effect was identified.
Q1.10.7	The Applicant *NRW(A)*	**Conservation Objectives** The Stage 2 SAC Report [APP-032] identifies sites and features in unfavourable condition. However, the condition of SPA's/Ramsar's has not been stated within the Stage 2 SPA Report [REP2-010]. Can the Applicant and NRW(A) advise if this information is available?	The UK's statutory nature conservation bodies (SNCBs) are responsible for assessing the condition of the habitats and species features of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Whilst condition assessments are routinely published for habitats and species features of SACs (as shown in Part Two: SACs Assessment (APP-032), the information is currently published for comparatively few marine SPA's/Ramsar sites. The Applicant has presented in section 1.6.2 of the Information to Support an Appropriate Assessment Part Three: SPAs and Ramsar sites Assessments (REP2-010) site descriptions, conservation objectives and condition assessment (if relevant) of the Liverpool Bay/Bae Lerpwl SPA and Isles of Scilly SPA which were identified for further assessment (integrity test: Step 2). Integrity test: Step 2 is the stage of the HRA process where it is appropriate to consider the assessment of the LSE of the project on the integrity of the site and its conservation objectives. The Applicant notes that NRW has produced indicative assessments of the condition of marine features in SPAs in Wales in 2018 (NRW, 2018). Although the waterbird assemblage was not assessed, red-throated diver and common scoter were found to be in favourable status in Liverpool Bay/Bae Lerpwl SPA (NRW, 2018). This information was not included in Section 1.6.2 of the Information to Support an Appropriate Assessment

Reference	Question to	ExQ1	Applicant's response
			Part Three: Special Protection Areas and Ramsar sites Assessments (REP2-010) as it was considered out of date. However, section 1.6.2 presents the latest Conservation Advice Package (CAP) document for Liverpool Bay/Bae Lerpwl SPA (Natural England, NRW and JNCC, 2022), which contains revised and updated conservation objectives for the features of the Liverpool Bay/Bae Lerpwl SPA, site-specific clarifications and advice in order for the conservation objectives to be achieved, and advice on management required to achieve the conservation objectives. Therefore, the Applicant considers that the latest information available has been included in the assessment presented in Information to Support an Appropriate Assessment Part Three: SPAs and Ramsar sites Assessments (REP2-010), and the 2018 condition assessment for Liverpool Bay would not alter the conclusions of the assessment. There is no condition assessment available for the Isles of Scilly SPA, but the site is legally underpinned by a number of SSSI sites (Annet SSSI, Big Pool & Browarth Point (St. Agnes) SSSI, Castle Down (Tresco) SSSI, Chapel Down (St. Martin's) SSSI, Eastern Isles SSSI, Gugh SSSI Norrard Rocks SSSI, Pentle Bay, Merrick and Round Islands SSSI, Samson (with Green, White, Puffin & Stony Islands) SSSI, Shipman Head & Shipman Down (Bryher) SSSI, St. Helen's (with Northwethel & Men-A-Vaur) SSSI, Tean SSSI, Western Rocks SSSI, and White Island (off St. Martin's) SSSI). Annet SSSI is the only SSSI with great-blacked backed gull listed as a notified feature; the most recent condition assessment in 2017 was 'Favourable' due to a 'large increase' reported. However, due to the age of the condition assessment and the subsequent publication of the Seabird Count data (Burnell *et al*, 2023) the condition assessment was not presented in the Information to Support an Appropriate Assessment Part Three: SPAs and Ramsar sites Assessments (REP2-010).
Q1.10.8	The Applicant	**Conservation Objectives** Can the Applicant confirm whether any qualifying features of the European sites assessed in the Stage 2 SPA Report [REP2-010] are in unfavourable condition and/or has a restore Conservation Objective (CO) target?	As detailed in the HRA Stage 1 Screening Report (REP2-012), a total of 36 SPAs (and Ramsar sites) designated for ornithological features were taken through to the Information to Support an Appropriate Assessment Part Three: SPAs and Ramsar sites Assessments (REP2-010). Only two of these SPAs (and Ramsar sites) (Liverpool Bay/Bae Lerpwl SPA and the Isles of Scilly SPA) were assessed in Step 2, which takes into

Reference	Question to	ExQ1	Applicant's response
			consideration the features of the site and provides a full assessment against the conservation objectives of the site. The Applicant can confirm that red-throated diver has a restore Conservation Objective target in Liverpool Bay/Bae Lerpwl SPA as presented in the Conservation Advice Package (CAP) document (Natural England, NRW and JNCC, 2022). The restore target is specifically in regard to the species distribution within the site. As stated within the CAP: "*Restore is used here because existing evidence shows the feature to have been displaced from previously used areas of the site. Therefore, we have set the target to prevent further displacement, while recognising current impacts to the feature, and where possible existing influences should be addressed.*" The Applicant has assessed displacement within the HRA Stage 2, and concluded no adverse effect on site integrity, while taking account this restore objective. Conservation Objective targets are listed respectively in Table 1.49 and Table 1.50 of HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (REP2-010) for Liverpool Bay/Bae Lerpwl SPA and Isles of Scilly SPA.
Q1.10.9	The Applicant	**Stage 2 assessment** The Applicant's Stage 2 SAC Report [APP-032] relies upon measures in an Offshore Construction Method Statement (CMS) to avoid adverse effects on Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC. An outline offshore CMS has not been submitted and at present there is no separate marine licence for the cable corridor. The ExA therefore lacks confidence these measures have been secured. Can the Applicant provide an outline Offshore CMS, which encapsulates all relevant measures, can be certified within the DCO and referred to within relevant requirements	Table 1.5 of The Applicant's HRA Stage 2 Part Two: Special Areas of Conservation (SACs) Assessments (APP-032) identifies that mitigation through development and adherence to an Offshore Construction Method statement (CMS) which includes a Cable Specification and Installation Plan (CSIP) that does not permit sandwave clearance within the Menai Strait and Conwy Bay SAC is secured within the deemed marine licence in Schedule 14 of the draft development consent order (REP2-004) and expected to be secured within the standalone NRW marine licence. However, the Menai Strait and Conwy Bay SAC is only relevant to the Natural Resources Wales (NRW) standalone marine licence area so reference to the being secured in the deemed marine licence is an error and has been added to the Errata Sheet (S_DP_1 F04) at Deadline 3.

Reference	Question to	ExQ1	Applicant's response
			The Mitigation and Monitoring Schedule (J10 F03) sets out (see reference number 5 in this document) that it is anticipated that this commitment will be included in the NRW standalone marine licence. Following a request from the Examining Authority to include it, the Mitigation and Monitoring Schedule is now a certified document within the draft development consent order (Schedule 15) (REP2-004) and this commitment will therefore be identifiable as part of the development consent order. It is appropriate for the submission of a final Offshore construction method statement for the offshore works which fall under the standalone marine licence to be secured within the standalone marine licence only. As indicated by the Marine Licence Principles Document (MLPD) (REP2-029), the Applicant anticipates that the NRW marine licence will include a condition which secures an Offshore construction method statement which, in turn, will include a restriction on sandwave clearance within the Menai Strait and Conwy Bay SAC. The drafting of the standalone NRW marine licence is within NRW marine licensing team's discretion. However, the MLPD has been provided by the Applicant to assist the examination by identifying the conditions the Applicant anticipates will be secured in the standalone marine licence and how this will align with the deemed marine licence. For these reasons, no further changes are proposed to the deemed marine licence. Further, the Applicant does not consider it necessary or proportionate to prepare an outline offshore construction method statement for the examination as the commitment is clearly identified within the Mitigation and Monitoring Schedule.
Q1.10.10	The Applicant	**Stage 2 assessment** The Applicant has stated that no sandwave clearance would take place within the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC. Can the Applicant provide assurances and demonstrate that installation will still be possible without sandwave clearance, particularly given the mobile nature of sandwaves?	Under Schedule 14, Condition 18(1)(d) of the draft development consent order (REP2-004), the Applicant has committed to the development of, and adherence to, an Offshore Construction Method Statement (CMS) including a Cable Specification and Installation Plan (CSIP). The CSIP includes a commitment to not undertake sandwave clearance within the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC as well as a commitment to cable burial where possible. This was made in accordance with the specific policies set out in the Welsh Marine Plan (Welsh

Reference	Question to	ExQ1	Applicant's response
			Government, 2019) and additionally the North West Inshore and North West Offshore Coast Marine Plans (MMO, 2021). The overlap between the Mona Offshore Cable Corridor and Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC is very small. Cable burial depth is influenced by seabed sediment structure and the predominantly sandy sediments present within the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC, as well as the sandwaves, identified by preliminary geophysical surveys in 2021 and 2022 (section 1.7.3 of Volume 6, Annex 2.1: Benthic subtidal and intertidal ecology technical report (APP-087)) indicate that cable burial will be possible within the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC without sandwave clearance. While sandwaves are mobile, they move slowly. The length of time between the preliminary geophysical surveys taking place and the installation of the offshore export cables will not be sufficient for significant migration to occur and for sandwaves to move into this area and require clearance. The preliminary survey results provide a robust indication of seabed features that are expected to be encountered at the point of construction (i.e. that there are no sandwaves that would require clearance in the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC). In the event that cable burial is not possible, cable protection will be installed. Within the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC the Offshore CMS which includes a CSIP will not permit the percentage of export cable requiring cable protection to exceed 10% of the total length of the export cable within the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC.
Q1.10.11	The Applicant	**Stage 2 assessment** Paragraph 1.5.3.9 of Stage 2 SAC Report [APP-032] states that site clearance activities will only occur outside of the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC. Section 3.5.4 of the ES project description [APP-050] implies site preparation is required across the entire application site. There is a small overlap of the SAC with the application site. Can the Applicant confirm if site	Volume 1, Chapter 3: Project Description (APP-050) provides an overview of the Mona Offshore Wind Project as a whole and does not provide details regarding the site preparation activities within the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC. As outlined in the Mitigation and Monitoring Schedule (J10 F03), the Applicant has committed to the development and adherence to an Offshore Construction Method Statement (CMS), including a Cable Specification and Installation Plan (CSIP) that does not permit sandwave clearance within the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC (Table 1.5 in the HRA Stage 2

Reference	Question to	ExQ1	Applicant's response
		clearance will be restricted in the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC, and if so how will this be controlled?	Information to Support the Appropriate Assessment, Part 2: Special Areas of Conservation Assessments (APP-032)). This measure will control the magnitude of the impacts which may occur within the SAC. The HRA has therefore been conducted on the basis of this commitment. This commitment is expected to be secured in the standalone Natural Resources Wales marine licence.
Q1.10.12	The Applicant	**Stage 2 assessment** The Applicant's Stage 2 SAC Report [APP-032] and Stage 2 SPA Report [REP2-010] rely upon measures in an Offshore Environmental Management Plan (EMP) to avoid adverse effects on marine mammal and offshore ornithological qualifying features. Can the Applicant provide an outline Offshore EMP to provide assurance that all measures relied upon to avoid AEoI are secured?	The Applicant does not consider it necessary to provide an outline Offshore Environmental Management Plan (EMP) to provide assurance that all measures relied upon to avoid an adverse effect on integrity on marine mammal and offshore ornithological qualifying features are secured. This is because the key measures, relevant to marine mammals and offshore ornithology, to be included within the Offshore EMP are fully detailed in the Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels (J17 F02) document, which the Applicant highlights has been updated at Deadline 3. All other measures which will be included in the Offshore EMP of relevance to marine mammals and offshore ornithological features (e.g. a Marine Pollution Contingency Plan) are committed to in the Mitigation and Monitoring Schedule (J10 F03) which is now a certified document within the draft development consent order (Schedule 15) (REP2-004.
Q1.10.13	The Applicant	**Stage 2 in-combination assessment** Can the Applicant explain why Table 1.3 contains Minesto Tidal Kite and Molaris Tidal project in Table 1.3 as Tier 1 projects, but these are not included in Table 1.57. Similarly, TwinHub Floating Offshore Wind Farm is included in Table 1.3 as a Tier 2 project but is not included in Table 1.57. Can the Applicant confirm whether or not these projects have been included in the in-combination assessment?	Table 1.57 within HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (APP-033) is now Table 1.63 within HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (REP2-010) in the updated document submitted at Deadline 2. Therefore, the Applicant has only referred to Table 1.63 in this response. Minesto Tidal Kite and Molaris Tidal Project have been listed in Table 1.3 of the HRA Stage 2 Information to Support an Appropriate Assessment Part Three: SPAs and Ramsar sites Assessments (REP2-010) as being projects with *potential* for in-combination effects on offshore ornithology. However, they are not included in Table 1.63 of the HRA Stage 2

Reference	Question to	ExQ1	Applicant's response
			Information to Support an Appropriate Assessment Part Three: SPAs Special Protection Areas and Ramsar sites Assessments (REP2-010) as there is no pathway for impact between the tidal projects and the Liverpool Bay/Bae Lerpwl SPA and Isles of Scilly SPA. Thus, the Minesto Tidal Kite and Molaris Tidal Project were not included in the in-combination assessment and were therefore omitted from Table 1.63 of the HRA Stage 2 Information to Support an Appropriate Assessment Part Three: SPAs and Ramsar sites Assessments (REP2-010) as this table only lists those other projects and plans that were included in the in-combination assessment. TwinHub Floating Offshore Wind Farm was incorrectly excluded from Table 1.57 of the HRA Stage 2 Information to Support an Appropriate Assessment Part Three: SPAs and Ramsar sites Assessments (APP-033) and Table 1.63 of the HRA Stage 2 Information to Support an Appropriate Assessment Part Three: SPAs and Ramsar sites Assessments (REP2-010). This has been included in the Errata Sheet (S_PD_1 F04) submitted at Deadline 3. However, Hub Floating Offshore Wind Farm has been included in Tables 1.44, 1.45, 1.46 and 1.47 of the HRA Stage 2 Information to Support an Appropriate Assessment Part Three: SPAs and Ramsar sites Assessments (REP2-010), which presents the in-combination assessments for four SPAs (Isles of Scilly SPA, Lambay Island SPA and Howth Head Coast SPA and Ireland's Eye SPA, respectively). Therefore, the Applicant can confirm that the three projects outlined in the Examining Authority's question have been considered within the in-combination assessment and included where relevant.
Q1.10.14	*NRW (A)* *JNCC*	***Stage 2 in-combination assessment*** *Is NRW (A)/JNCC content with the projects included in the in-combination assessments as detailed in:* *• Annex I habitats – Table 1.21 and Figure 1.9 of [REP2-012]*	Annex I habitats: The Statement of Common Ground (SoCG) between Mona Offshore Wind Project and NRW (A) submitted at Deadline 1 (Initial SoCG between Mona and Natural Resource Wales (Advisory) - (REP1-025)) confirms that NRW(A) are in agreement with the projects screened into the in-combination assessment of the Habitats Regulations Assessment (HRA) for benthic subtidal and ecology (please refer to NRW.HRA.9 within REP1-025). The Applicant notes that, as outlined in the SoCG between Mona Offshore Wind Project and the JNCC submitted at

Reference	Question to	ExQ1	Applicant's response
		• *Annex II diadromous fish species – Table 1.58 and Figure 1.9 of [REP2-012]* • *Annex II marine mammals – Table 1.154 and Figure 1.13 of [REP2-012]* *Offshore ornithological features – Table 1.57 and Figure 1.21 of [REP2-010]*	Deadline 1 (REP1-028), no sites designated for Annex I habitats occur in the offshore area (past 12 nm) of the Mona Offshore Wind Project. The JNCC, therefore, had no comments to make on the in-combination assessment for European sites with Annex I habitat features and has deferred inshore (within 12 nm) matters to NRW. Annex II diadromous fish: The SoCG between Mona Offshore Wind Project and NRW(A) submitted at Deadline 1 (Initial SoCG between Mona and NRW(A) - Offshore (REP1-025)) confirms that NRW(A) are in agreement with the projects screened into the in-combination assessment of the HRA for fish and shellfish ecology (please refer to row NRW.HRA.17 within REP1-025). Note that fish and shellfish ecology is outside of the remit of the JNCC. Therefore, no agreement for this topic has been sought with this stakeholder. Annex II marine mammals: The SoCG between Mona Offshore Wind Project and JNCC submitted at Deadline 1 (Initial SoCG between Mona and JNCC (REP1-028)) confirms that the JNCC agree that the list of projects screened into the in-combination assessment in the HRA reflects projects currently known about in respect offshore waters, however, defer to NRW (A) regarding whether all projects in territorial waters have been accounted for (see JNCC.MM.26). The Applicant confirms that NRW(A) agrees with the list of projects screened into the in-combination assessment for marine mammals, as detailed in row NRW.HRA.24 in the SoCG between Mona Offshore Wind Project and NRW(A) submitted at Deadline 1 (Initial SoCG between Mona and NRW(A) – Offshore (REP1-025)). Offshore Ornithology: The SoCG between Mona Offshore Wind Project and NRW submitted at Deadline 1 (Initial SoCG between Mona and NRW(A) – Offshore (REP1-025)) notes the list of projects screened into the in-combination assessment in the HRA is an ongoing point of discussion. Whilst NRW(A) agrees with the projects screened into the EIA in-combination assessment, NRW(A) has concerns regarding the lack of data for the projects screened into the assessment (see row NRW.OO.19-20 in REP1-025).

Reference	Question to	ExQ1	Applicant's response
			The SoCG between Mona Offshore Wind Project and JNCC submitted at Deadline 1 (Initial SoCG between Mona and JNCC (REP1-028)) confirms that the JNCC agrees that the list of projects screened into the in-combination assessment in the HRA is appropriate (see row JNCC.OO.29 in REP1-028)). Noting SNCBs concerns raised pre- and post-application with respect to the potential contribution of historical projects to the offshore ornithology CEAs, the Applicant has undertaken a 'gap-filling' exercise in accordance with SNCBs advice (which is presented in Section D.6.13 of Appendix D of Technical Engagement Plan (APP-042)) to generate indicative estimates for currently unquantified impacts from historical projects. This information is intended to further facilitate the SNCB's understanding of the total quantitative cumulative impact for offshore ornithology. The Applicant has submitted the results of the gap-filling exercise at Deadline 3 (see the Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (S_D3_12)). The Applicant has undertaken a review of new information on cumulative plans and projects in the public domain since the Mona Offshore Wind Project was submitted and has considered whether the new information would alter the conclusions of the cumulative effects assessment and in-combination assessment. This Review of Cumulative Effects Assessment and In-combination Assessment (S_D3_18) has been submitted at Deadline 3.
Q1.10.15	The Applicant	**Stage 2 in-combination assessment** Meath County Council responded to the Secretary of States transboundary consultation under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 [OD-021]. This identified two offshore windfarms applications (Oriel and North Irish Sea Array) have ES and HRA information available on their website. However, the Mona HRA states that only Scoping Report information is available for these two projects. Can the Applicant explain	At the time the Mona Offshore Wind Project application was written, only the scoping reports for the Oriel and North Irish Sea Array offshore wind projects were available in the public domain. In accordance with the Planning Inspectorate's advice note on cumulative effects assessments (Planning Inspectorate, 2024), both the Oriel and North Irish Sea Array offshore wind projects were categorised as Tier 2 cumulative projects in the in-combination assessment on the basis that no application had been published at the time of the assessment. As outlined in Volume 1, Chapter 5: Environmental Impact Assessment Methodology (APP-052) the list of

Reference	Question to	ExQ1	Applicant's response
		whether the information provided for these two offshore windfarms has any implications for the Mona OWF HRA? Can the Applicant confirm if it will be updating the in-combination assessment? (including the cumulative effects assessment?).	cumulative projects was finalised three months before submission of the Environmental Statement (on 21 November 2023). The Applicant notes that the applications for the Oriel offshore wind project and the North Irish Sea Array offshore wind project were submitted to An Bord Pleanála in May 2024 and June 2024, respectively. The Applicant has undertaken a review of new information on cumulative plans and projects in the public domain since the Mona Offshore Wind Project was submitted and has considered if the new information would alter the conclusions of the CEA and in-combination assessment. This review (Review of Cumulative Effects Assessment and In-combination Assessment) (S_D3_18) has been submitted at Deadline 3 and concludes that the update from Tier 2 to Tier 1 for the Oriel and North Irish Sea Array offshore wind projects does not alter the conclusions of the assessments within the application with respect to Annex I habitats and Annex II diadromous fish and marine mammals. The Applicant is, therefore, confident that there is no change to the conclusions of the HRA Stage 2 ISAA Part 2: Special Areas of Conservation (SACs) Assessments (APP-032). The Review of Cumulative Effects Assessment and In-combination Assessment) (S_D3_18) notes that further assessment of impacts to offshore ornithological features is required to understand the potential in-combination effects and that this will be undertaken at Deadline 4.
Q1.10.16	The Applicant	**NatureScot** In response to NatureScot [AS-024] submission can the Applicant: I. respond to problems with the quality of the application; and II. undertake an assessment on European sites in Scotland to accord with relevant Scottish guidance stated by NatureScot (particularly different thresholds for triggering PVA of relevant qualifying species from Scottish Special Protection Areas).	The Applicant has responded to NatureScot's submission (AS-024) at Deadline 3 (see the Response to NatureScot (S_D3_11)) but has provided specific information in relation to points I. and II. in the Examining Authority's question below. I. The Applicant acknowledges that NRW(A) and the JNCC have identified discrepancies within the Environmental Statement and Habitats Regulations Assessment (HRA) application materials in their relevant representations (RR-011 and RR-033, respectively) and written representations (REP1-056 and REP1-066/REP1-067, respectively). The Applicant acknowledges NatureScot's additional submission (accepted at the discretion of the Examining Authority) (AS-024). The Applicant has responded to this at Deadline 3 (see the Applicant's Response to NatureScot (S_D3_11)). Appreciating the need for clarity in the application material, the Applicant

Reference	Question to	ExQ1	Applicant's response
			submitted revised offshore ornithology application EIA and HRA material (as tracked and clean versions) at Deadline 2 to address the errata. This included: • Volume 2, Chapter 5: Offshore Ornithology (REP2-016) • Volume 6, Annex 5.2: Offshore Ornithology Displacement Technical Report (REP2-018) • Volume 6, Annex 5.3: Offshore Ornithology Collision Risk Modelling Technical Report (REP2-020) • Volume 6, Annex 5.5: Offshore Ornithology Apportioning Technical Report (REP2-022) • Volume 6, Annex 5.6: Offshore Ornithology Population Viability Analysis Technical Report (REP2-024) • HRA Stage 1 Screening Report (REP2-012) • HRA Stage 2 Information to Support an Appropriate Assessment (ISAA) Part Three: Special Protection Areas (SPAs) and Ramsar Sites Assessments (REP2-010) • HRA Integrity Matrices (REP2-014). The Applicant also submitted, alongside the revised application documents, a Schedule of Changes to the Offshore Ornithology EIA and HRA Documents (REP2-087). This document describes the changes made to the offshore ornithology EIA and HRA application materials including a summary of the change, details of where the change has been made, the reason for the change and how it corresponds to the errata identified in the Errata Sheet (REP1-044) submitted at Deadline 1. Several additional minor errata have been identified since submission of the updated application materials at Deadline 2 although none impact the HRA application materials. These have been recorded in the Errata Sheet (S_PD_1 F04) and an Offshore Ornithology Errata Clarification Note (S_D3_26) submitted at Deadline 3. None of the errata identified in the application materials alter the conclusions presented in Volume 2, Chapter 5: Offshore Ornithology (REP2-016) and the HRA Stage 2 Information to Support an Appropriate Assessment (ISAA) Part

Reference	Question to	ExQ1	Applicant's response
			Three: Special Protection Areas (SPAs) and Ramsar Sites Assessments (REP2-010). Furthermore, the Applicant has also submitted an Offshore Ornithology Supporting Information Technical Note (S_D3_19) at Deadline 3, which brings together the key assessment information, with clear signposting to where this and further supporting details can be found within the application documents. In addition, it presents additional information in accordance with advice from the statutory nature conservation bodies (SNCBs). The Applicant has engaged with the JNCC and NRW on the scope and presentation of this clarification note to ensure this sufficiently addresses the SNCBs concerns and the Examining Authority's Request for Further Information – Rule 17 (PD-012/PD-012a). II. Whilst the Applicant has consulted with NatureScot (Section D.4, E3.1 Consultation Report Appendices - Part 2 (D to D.24) (APP-039)), the Applicant has followed guidance recommended by the SNCBs which have jurisdiction in the Mona Offshore Wind Project location (i.e. NRW and the JNCC). It must be emphasised that the JNCC has a UK remit, and therefore the JNCC's advice is relevant to European sites in Scotland in waters wholly or partly in waters beyond 12nm. The Applicant acknowledges that there are some differences between the NatureScot's guidance (as highlighted in the Applicant's Response to NatureScot (S_D3_11) submitted at Deadline 3) and the approach recommended by NRW and the JNCC which has been followed at application, notably the threshold at which PVAs are undertaken. A threshold for undertaking PVA of a 1% increase in baseline mortality has been used for the Mona Offshore Wind Project. Using this percentage increase in baseline mortality is in line with English and Welsh guidance (Parker et al, 2022) and has been accepted by NRW and JNCC (Technical Engagement Plan Appendices - Part 1 (A to E) (APP-042)). It has also been widely applied in EIAs and the Secretary of State's HRAs for UK offshore wind farm projects. In addition, this threshold was presented through the pre-application consultation in the Preliminary Environmental Information Report and at application and the Applicant has not received any advice from SNCBs or wider stakeholders that a 1% increase in baseline mortality threshold should not be used. The Applicant does not

Reference	Question to	ExQ1	Applicant's response
			consider it necessary or appropriate to present a second threshold, and therefore, does not intend to present a separate assessment using the survival rate change threshold as set out in NatureScot guidance. Furthermore, the Applicant notes that the use of the NatureScot's guidance threshold has not been requested by NatureScot in their submission (AS-024).

2.9 Historic Environment

Table 2.9: Response to ExQ1: Historic Environment Questions

Reference	Question to	ExQ1	Applicant's response
Q1.11.1	The Applicant	**Gwrych Castle Boundary Wall** Provide an update on the status of the Listed Building Consent for modification (to facilitate construction traffic) of the listed boundary wall at Gwrych Castle including the prospective timeline for this application. If consent is not granted, what are the implications for the Proposed Development?	The Applicant can confirm that a Listed Building Consent application was submitted to CBCC on Monday 5th August 2024. The reference number is PP-13228145. The application has been validated by CCBC and the comments have been received from the CCBC Conservation Officer, CCBC Environment, Roads & Facilities and Abergele Town Council. No objections have been received to date. The application will be determined as soon as possible and is expected to be heard at an upcoming CCBC Planning Committee. If consent for the Listed Building Consent is not granted then it is likely the Mona Offshore Wind Project would re-apply once detailed design information is available, by looking to address the reasons for refusal in an updated design. This would be within the confines of what is assessed within the Environmental Impact Assessment and allowed within the powers of the Development Consent Order. The existing access into the landfall construction area is capable of being used in its existing configuration. The proposed works to the listed boundary wall are, however, the optimal solution as they will provide for a wider access to optimise the configuration for HGV movements and provide for safety considerations and associated with visibility splays.
Q1.11.2	The Applicant	**Archaeological Surveys** In [APP-068], Section 5.6.3, concerning further investigation into the archaeological potential of land on parts of the Mona Onshore Development Area, it is stated that further archaeological investigations have begun. Can you provide an update on progress and any implications for the outcomes presented in the ES.	The further archaeological investigations referenced in Section 5.6.3 of Volume 3, Chapter 5: Historic Environment of the ES [APP-068] comprise the completion of the trial trenching survey campaign as discussed during the Archaeology and Heritage Forum – Onshore in November 2023 (E4.3: Technical Engagement Plan Appendices – Part 3 (APP-044)). The survey campaign was remobilised in March 2024 for approximately four weeks, however poor weather conditions and access constraints resulted in the survey being postponed until September 2024. The trial trenching survey resumed in September 2024 for approximately three weeks and completed the trenches at the Onshore Substation.

Reference	Question to	ExQ1	Applicant's response
			A small number of the trial trenches along the Onshore Cable Corridor could not be excavated due to access limitations and the presence of livestock. The Applicant has notified Heneb that the final few locations of the trial trenching campaign could not be completed. These remaining trial trenches will be excavated post-consent but ahead of the commencement of construction. This position is set out in paragraph 1.4.2.1 of the Outline Onshore Written Scheme of Investigation (APP-209). Whilst the evidence base is not complete due to the ongoing trial trenching programme, Heneb confirmed they are satisfied that the archaeology baseline (as presented in Volume 3, Chapter 5: Historic Environment of the ES [APP-068]) is robust for the EIA purposes (see HENEB.OA.5 in Statement of Common ground – Heneb: Clwyd-Powys Archaeology/Heneb: Gwynedd Archaeology (Document Reference: REP1-035)). On this basis the assessment presented within paragraphs 5.10.2.1 to 5.10.2.10 of Volume 3, Chapter 5: Historic Environment of the ES (APP-068) will remain unchanged.

2.10 Land Use

Table 2.10: Response to ExQ1: Land Use Questions

Reference	Question to	ExQ1	Applicant's response
Q1.12.1	The Applicant	**Policy context** Paragraph 7.5.2.6 of ES Chapter 7 (Vol 3) [APP-070] cites two authorities for assessing the significance of the Proposed Development's effect on soils. Please explain how you reached your conclusion in the final sentence of that paragraph.	The Applicant identifies that the permanent loss of Grade 3a quality agricultural land (i.e. the lowest quality of best and most versatile land) associated with the Mona Offshore Wind Project is limited to approximately 1.7ha of land. The majority of land that would be permanently affected by the Proposed Development has been located on 10.1 ha of lower quality Subgrade 3b land. The criteria for the assessment have been applied in accordance with the DMRB criteria, identifying the loss to be of moderate adverse significance. Expert judgement has then been applied to this assessment, based on Welsh Government guidance provided in TAN 6 to determine the significance of this effect. The Applicant notes that these criteria and professional judgement were also applied in the Preliminary Environmental Information Report and no comments on the application of this methodology were raised during the statutory consultation process, including from Welsh Government. TAN 6 provides guidance on the thresholds to be applied to the consideration of applications affecting agricultural land at a national level through consultation with Welsh Government. This guidance states that Welsh Government should be consulted where proposals "*would involve the loss of 20 hectares or more of grades 1, 2 or 3a land or a loss which is less than 20ha but is likely to lead to further losses amounting cumulatively to 20 hectares or more*". The losses of best and most versatile land associated with the Mona Offshore Wind Project would not lead to the loss of 20ha of land under the guidance in TAN 6. Welsh Government have also in their written representation (REP1-051) referenced that the IEMA guidance (A New Perspective on Land and Soil in EIA - February 2022) should also be considered in the determination of significance.

Reference	Question to	ExQ1	Applicant's response
			In this context, the IEMA guidance states, at Section 5.3, in relation to the assessment of land and soil that, based on the TAN 6 guidance on consultation, that "*in Wales, more than 20 ha BMV loss is considered 'nationally significant*". As a nationally significant infrastructure project and on the basis that the Mona Offshore Wind Project would lead to the permanent loss of approximately 1.7ha of best and most versatile Subgrade 3a land, the permanent effect of the Project on best and most versatile land has been assessed not to be significant.
Q1.12.2	The Applicant	**Additional information** In its WR [REP1-051] the Welsh Government identified 8 specific areas of additional information that it considered necessary in order to review your Agricultural Land Classification field survey. Do you intend to submit this information to the Examination? If not, please explain why you consider it is not needed.	A meeting with Welsh Government is being set up for early October to discuss the points raised by Welsh Government in its Written Representation [REP1-051] and to provide the necessary clarifications to allow its validation of the Applicant's ALC (Agricultural Land Classification) report findings. The clarifications will be submitted into the Examination.
Q1.12.3	The Applicant	**Disruption to recreational resources** In Section 7.8.5 of ES Chapter 7 (Vol 3) [APP-070] you say that there is potential for the Proposed Development to result in temporary disruption of six identified recreational resources. Can you succinctly advise on the likely nature, scale and duration of disruption envisaged?	The implementation of the measures within the Outline Code of Construction Practice (REP2-038) should ensure that any disruption to these recreational facilities is reduced, as far as possible. No significant effects on these resources have been identified in Volume 3, Chapter 7: Land Use and Recreation (APP-070). However, on a precautionary basis, it has been assessed that there could be a low magnitude of impact on these facilities during the construction phase which could include, for example, localised impacts on access to the facilities associated with the proximity of construction traffic or noise associated with construction activities.
Q1.12.7	The Applicant	**Intensive dairy farms** Referring to, as appropriate, Figures 7.3 to 7.6 inclusive of ES Chapter 7 (Vol 3) [APP-070] can you give the correspondent Landholding numbers for the three intensive	The Applicant confirms that within the Figures 7.3 – 7.6 of Volume 3, Chapter 7: Land Use and Recreation (APP-070) the dairy farming operations comprise:

Reference	Question to	ExQ1	Applicant's response
		dairy farming operations that you refer to in paragraph 7.4.7.10 thereof?	• Lloyd Evans: owner of landholding number 36 and tenant of 40. • Owen: owner of landholding 33 and tenant of 38 • Roberts: tenant of part of landholding 30 to the east of holding numbers 20/23 and 25. The land which would be affected by the Project within the three dairy enterprises is also shown on the Land Plan (Onshore) (AS-005) where the plots associated with each enterprise are as follows: <u>Lloyd Evans:</u> • Owned land – Plots - 09-169, 09-171, 09-172, 09-174, 09-175, 09-176, 09-177, 09-178, 10-184 • Tenanted land – Plots - 10-179 <u>Owen</u> • Owned land – Plots – 09-156, 09-157 • Tenanted land – Plots - 11-190, 11-197, 11-199, 11-211, 11-213, 11-216, 11-217, 10-185, 10-186, 10-188, 11-191, 11-192, 11-196, 11-198, 11-202, 11-214, 11-193, 11-195, 11-215 <u>Roberts</u> • Tenanted land – Plots - 07-131, 07-133, 07-134, 08-136, 08-137

2.11 Landscape and Visual and Good Design

Table 2.11: Response to ExQ1: Landscape and Visual and Good Design Questions

Reference	Question to	ExQ1	Applicant's response
Q1.13.1	The Applicant	**Task lighting** During ISH2 [EV3-008] and in [REP1-012], it was confirmed that task lighting would be used during hours of darkness for the construction of the Onshore Substation, and that task lighting was included as part of the MDS in the LVIA. • It is noted that Table 6.19 of ES Chapter 3 (Vol 3) refers to task lighting and the in [REP2-086] you state that this was assessed. However, the assessment of nighttime effects in ES Annex 6.4 (Vol 7) [APP-156] does not appear to refer to task lighting at all. Can the Applicant explain how or where this was assessed and update the LVIA accordingly? • If assessed, did the task lighting (for construction) assume any upper or lower limits for intensity levels? • If not, do you believe that it would be appropriate to provide a limit to the lighting intensity levels for the task lighting required during construction at the Onshore Substation site?	The Applicant notes that section 1.11 of Volume 7, Annex 6.4 [APP-156] describes the methodology used to assess potential effects on night-time views and landscape during the construction, operations and maintenance and decommissioning phases of the Mona Offshore Wind Projects. The methodology states that the assessment of night-time effects is based on the description of lighting for the Mona Offshore Wind Project provided in Volume 1, Chapter 3: Project Description [APP-050]. The Applicant notes that paragraph 3.7.2.38 of Volume 1, Chapter 3: Project Description [APP-050] states that "*task lighting may also be required during working hours in the winter months*". Task lighting is listed in Table 6.19 of Volume 3, Chapter 6: Landscape and Visual Resources [APP-069] together with other construction activities that will be undertaken as part of the Mona Offshore Wind Project. The application has followed a holistic and proportionate approach and has assessed all relevant construction activities (including associated equipment, activities and movements described in Table 6.19 (see paragraph 6.11.1.26 of Volume 3, Chapter 6: Landscape and Visual Resources [APP-069])). Task lighting is driven by health and safety requirements for working during certain times of the day. The assessment of task lighting was based on the lighting design principles set out in the Outline Artificial Light Emissions Plan [REP-058]. The final Artificial Light Emissions Plan will be prepared during detailed design and will include upper or lower limits for intensity levels (subject to any requirements imposed by the Construction Design and Management Regulations 2015) that will take into account proximity to residential dwellings and ecological receptors (e.g. bats) and also the time of day when the lighting is required. The final Artificial Light Emissions Plan is part of the CoCP that is secured through Requirement 9 of the draft development consent order (REP2-004) and will be agreed with the relevant planning authority prior to commencement of works.

Reference	Question to	ExQ1	Applicant's response
			Requirement 9 offers a suitable control on construction lighting and no additional limit on task lighting is necessary.
Q1.13.3	The Applicant	**Effect on National Landscapes** In exercising or performing any functions in relation to, or so as to affect, land in an Area of Outstanding Natural Beauty (AONB) (now National Landscapes), section 85 of the Countryside and Rights of Way Act 2000 places a duty on the relevant authority to have regard to the purpose of conserving or enhancing the natural beauty of the AONB. • With regards to the CRDV National Landscape, Can the Applicant provide comments on why it considers the relevant authority could be satisfied the duty placed on it would be complied with if development consent were to be granted?	The Mona Offshore Wind Project adheres to the section 85 of the Countryside and Rights of Way Act 2000 by ensuring there are no significant effects on the special qualities or the setting of the Clwydian Range and Dee Valley National Landscape. This is due to the distance of the onshore development from the Clwydian Range and Dee Valley National Landscape, the height of the onshore substation and the intervening vegetation within the existing landscape. The onshore elements of the Mona Offshore Wind Project therefore do not affect the conservation of the natural beauty of the Clwydian Range and Dee Valley National Landscape.
Q1.13.4	The Applicant	**Access from Glascoed Road** The onshore substation access is shown in Figure 3.21 of The Project Description [APP-050], and the permanent access is described within the MDS outlined in Table 6.19 of F3.6 [APP-069]. • Can you provide any further detail on the route that the permanent road would take? • Can the access road be shown or overlaid on the Illustrative Landscape and Ecology Strategy Plan? • Confirm if any landscaping mitigations would be required in the vicinity of the permanent access roads.	The Applicant cannot provide further detail on the route of permanent access road into the onshore substation within Work No. 29 (as identified in the Works Plan – Onshore [AS-003]). The Applicant can confirm the permanent access road would be a width of 15m which includes drainage and utilities connections (as referenced in Table 3.34 of APP-050). Flexibility in the route of the permanent access as it approaches the onshore substation south of the Ash woodland is deliberately maintained because the layout of the onshore substation (including location of access gate) is not yet determined within Work No. 22a. Further detail on the route of the road will be provided during detailed design. The Applicant notes that an indicative route of the permanent access road for the onshore substation is also provided in Figure 1.4 Illustrative landscape and ecology strategy plan of the Outline Landscape and Ecology Management Plan [REP2-034] as delineated by the proposed hedgerow planting. The indicative route was selected as the maximum design scenario as the route required the removal of a section of existing hedgerow. The proposed landscape and ecological mitigation includes the planting of a new hedgerow and creation of a swale (see Figure 1.4 of the Outline LEMP [REP-034]). The landscape mitigation in the vicinity of the permanent access road comprises wildflower meadow, areas of scrub,

Reference	Question to	ExQ1	Applicant's response
			new ponds and hedgerows. If the route of the permanent access road was different to the indicative route shown in Figure 1.4 of the Outline LEMP ([REP2-034], the landscape and ecology strategy plan would be updated in consultation with Denbighshire County Council as part of the discharge of requirements process. The Applicant is confident that the landscape mitigation would still deliver its intended purpose regardless of where the permanent access road is located within Work No. 29.
Q1.13.6	The Applicant	**Viewpoints 2 and 3** Updated and annotated visualisations were provided at D1 [REP1-015] for VP 2 and 3. These show the representative viewpoints at Year 1 in the winter, and Year 15 in the summer. • Explain if there would be any significant difference in the coverage and function of the mitigations between winter in year 15 and summer in year 15? • Could there be any corresponding difference in the significance of effects as assessed for the viewpoints?	The Applicant notes that the depth and extent of the proposed woodland planting and layers of hedgerow planting (both restored hedgerows and new hedgerows) will provide screening both in winter and summer. The Applicant has provided photomontages of winter year 15 for representative viewpoints VP2 and VP3 to demonstrate this point in document S_D3_25.9. The Applicant confirms there would be no corresponding difference in the significance of effects between summer and winter year 15 for VP2 and VP3.
Q1.13.8	The Applicant	**Views from Residential Properties** Section 6.5.7.6. of [APP-069] describes the views towards the Onshore Substation site from the closest residential properties, and the degree of harm experienced by these properties in terms of visual impacts. In light of the points raised in [REP1-086] can you: • Describe which ground floor viewpoints were considered • Describe what would be meant by 'substantial harm' in this context • Explain why it is considered that the property does not experience a degree of harm over and above substantial to make considering private views a public interest matter.	**Ground floor viewpoints** The Applicant visited the Onshore Substation site in November 2023 to undertake a photographic survey (see Table 6.11 of Volume 3, Chapter 6: Landscape and Visual Resources [APP-069]). Photos were taken from the Onshore Substation site towards the following properties to confirm the position of windows and direction of view as well as intervening buildings and vegetation: • Tan-y-bryn (141 m to the east of the Mona Onshore Substation platform) • Isfryn Farm (282 m to the south of the Mona Onshore Substation platform) • Cae-llŵyd (283 m to the southwest of the Mona Onshore Substation platform) Photos from these properties were not included within APP-155 as access was not obtained to the properties. However, the fieldwork allowed the Applicant to assess views from the properties and their curtilage.

Reference	Question to	ExQ1	Applicant's response
			Access was granted to Tyddyn Meredydd (184 m to the west of the Mona Onshore Substation platform); the photography from immediately in front of the house is included in Appendix C, Figure C2a of Volume 7, Annex 6.3: Visual Baseline Technical Report -Onshore Development [APP-155]. The views available from these properties were described in Section 6.5.7.6 of Volume 3, Chapter 6: Landscape and Visual Resources [APP-069] and summarised below. The assessment of effects is based on photography from, and of, the views from these properties as described above. The summary/overview is included within paragraph 6.5.7.6 of Volume 3, Chapter 6: Landscape and Visual Resources [APP-069]. In assessing the effects on private properties the Applicant has also considered the proposed landscape mitigation, which would apply in respect of those views. Figure 6.5 of APP-69 and also Figure 1.4 of APP-208 illustrates what was factored into the assessment. **Substantial harm from visual effects** As with GLVIA3, there are no "hard and fast rules" on what constitutes degrees of significance, as judgements are made on a case-by-case basis. The Landscape Institute has provided guidance on residential visual amenity in Landscape Institute Technical Guidance Note 2/19 Residential Visual Amenity Assessment (LI TGN 2/19) which was applied to the assessment undertaken in Volume 3, Chapter 6: Landscape and Visual Resources [APP-069]. Paragraph 1.5 of LI TGN 2/19 states that *"Changes in views and visual amenity are considered in the planning process. In respect of private views and visual amenity, it is widely known that, no one has 'a right to a view.' This includes situations where a residential property's outlook / visual amenity is judged to be 'significantly' affected by a proposed development, a matter which has been confirmed in a number of appeal / public inquiry decisions."*

Reference	Question to	ExQ1	Applicant's response
			LI TGN 2/19, paragraph 4.7, cites developments where residential visual amenity assessments (RVAA) have taken place. In general, the taller the structure proposed, the larger the study area, within which properties may experience effects that warrant a RVAA. For overhead transmission lines, only those properties within 50 to 150 m are potentially considered for inclusion within an RVAA. Pylons are considerably taller than the Mona Onshore Substation (including lightning rods/masts). LI TGN 2/19 recognises that distance from and the height of a proposed development is an essential part in judging significance. Paragraph 4.19, of LI TGN 2/19, provides further guidance on whether an RVAA is required *"Some examples of descriptions and descriptors that might be used* [in describing impacts] *include: 'blocking the only available view from a property', or 'overwhelming views in all directions'; and 'unpleasantly encroaching' or being 'inescapably dominant from the property.'"* At paragraph A1.7 the same inspector noted that *"There needs to be a degree of harm over and above an identified substantial adverse effect to take a case into the category of refusal in the public interest. Changing the outlook from a property is not sufficient."* **Degree of harm over and above substantial harm** Paragraph 2.2, of LI TGN 2/19, provides clarity on the terms overwhelming, over-bearing and overly intrusive (and therefore in the public interest) *"one might use terms such as 'overwhelming/ overbearing' for tall structures, or 'overly intrusive' for a development overlooking a garden or principal room."* Due to the distance from the closest properties, the intervening vegetation and the height of the proposed Onshore Substation, views of the proposed Onshore Substation would neither overwhelm existing properties within the LVIA study area, nor render these properties so *"unattractive a place to live that planning permission should be refused"* (Inspector Kingaby,

Reference	Question to	ExQ1	Applicant's response
			Burnthouse Farm Wind Farm, APP/D0515/A/10/2123739, Inspector's Report, paragraph 119) (also at paragraph A1.6 of LI TGN 2/19). The following summary is from paragraph 6.5.7.6 of Volume 3, Chapter 6: Landscape and Visual Resources [APP-069],: • Tan-y-bryn (141 m to the east of the Onshore Substation platform). Ground floor views towards the substation are mostly screened by intervening stables/other buildings, as well as hedgerows. There are no first-floor windows facing towards the Onshore Substation • Tyddyn Meredydd (184 m to the west of the Onshore Substation platform). Ground floor views towards the substation are screened by outbuildings/barns between the house and the road. There is a view through to the road over the gate onto the road, however, this view is truncated by a hedgebank/hedgerow on an embankment. The main ground floor views from this property are towards the northern end of the Clwydian Range and the coast. There are potential first floor views in the direction of the Onshore Substation • Isfryn Farm (282 m to the south of the Onshore Substation platform). Isfryn Farm has a large barn, as well as a number of hedgerows with mature hedgerow trees, between the farmhouse and the Onshore Substation location • Cae-llŵyd (283 m to the southwest of the Onshore Substation platform). A combination of topography and woodland screens or partly screens views from this property.
Q1.13.10	The Applicant	**OLEMP** The maintenance and replanting period for deceased mitigation planting or tree is stated as 5 years in the OLEMP [REP2-084], section 1.8.3., • Given the reliance on planting to reduce significant effects over a 15 year period, is 5 years sufficient? • In the instance where mitigation planting or trees needed replacing after five years, who would be responsible for it?	The Applicant considers that the five-year maintenance and replanting period for the landscape planting as set out in the Outline LEMP [REP2-084] is sufficient. This is because the planting will have become sufficiently established within the first five years to continue to develop into sufficient maturity that reduces significant effects. Maintenance and replanting periods of similar durations have been agreed for other nationally significant infrastructure projects in the local area (e.g. Awel y Môr). The LEMP secured through the DCO will provide the necessary mechanism to ensure that mitigation planting would reach sufficient

Reference	Question to	ExQ1	Applicant's response
		• After 5 years, what mechanism would be in place to ensure that the mitigation planting and trees would reach sufficient maturity and quality as to fulfil the mitigation function as required?	maturity and quality to fulfil its mitigation function. Please refer to Q1.18.10 for commitments regarding restart of the maintenance period for re-planted trees.

2.12 Marine and Coastal Physical Processes and Coastal Change

Table 2.12: Response to ExQ1: Marine and Coastal Physical Processes and Coastal Change Questions

Reference	Question to	ExQ1	Applicant's response
Q1.14.1	The Applicant	**Numerical Modelling in the Nearshore Environment** NRW has raised concerns that numerical modelling conducted to determine the impact to physical processes caused by cable protection has not been carried out in the shallow nearshore environment in the event that cable protection was to be placed over the four trenchless drilling exit pits. • Can the Applicant provide further numerical modelling in the nearshore shallow water? • If the Applicant does not consider this necessary, provide clear justification and demonstrate how the decision maker can be satisfied, in light of paragraphs 5.6.17 and 5.6.18 of NPS EN-1, that: - Any potential impacts on coastal processes at other locations would be minimised - The Proposed Development would be resilient to coastal erosion and deposition, taking account of climate change, during the project's operational life and any decommissioning period	The Applicant notes that the bulleted items in Q1.14.1 paraphrase NPS EN-1 (2023) paragraphs 5.6.17 and 5.6.16, respectively. For clarity, the Applicant highlights that paragraph 5.5.16 and 5.6.17 of NPS EN-1 (2023) state that: "*The Secretary of State should be satisfied that the proposed development will be resilient to coastal erosion and deposition, taking account of climate change, during the project's operational life and any decommissioning period…"* (paragraph 5.6.16). and "*The Secretary of State should not normally consent new development in areas of dynamic shorelines where the proposal could inhibit sediment flow or have an adverse impact on coastal processes at other locations. Impacts on coastal processes must be managed to minimise adverse impacts on other parts of the coast...* " (paragraph 5.6.17). As outlined in the Applicant's Response to Written Representations (see row REP1-056.182 in Appendix to Response to WRs: NRW (REP2-080)) and detailed in the Mitigation and monitoring schedule (J10 F03), the Applicant has committed to ensuring no more than a 5% reduction in water depth (referenced to Chart Datum) will occur at any point along the Mona Offshore Cable Corridor without prior written approval from the Licensing Authority in consultation with the Maritime Coastguard Agency. Further information relating to the Deemed Marine License is provided in the Applicants response to Q1.7.4. The Applicant has confirmed in its response to Relevant Representations (see RR-011.53 in the Applicant's Response to Relevant Representations (PDA-008)) that the height of the cable protection above the seabed may be altered in relation to the given water depth to adhere to this commitment, ensuring that any cable protection is sufficiently low profile to cause minimal changes to wave, tide and sediment transport. Thus, implicitly, the detailed design (either by location, installation methodology or type of cable protection) will ensure there are no significant impacts in accordance with NPS EN-1 paragraph 5.6.17.

Reference	Question to	ExQ1	Applicant's response
			With respect to undertaking modelling of cable protection in shallow water, the commitment to limit change in water depth to 5% (unless otherwise approved by Licensing Authority in consultation with the Maritime Coastguard Agency) means that the height of cable protection above bed level is restricted. For example, a water depth of 5 m to Chart Datum cable protection would be limited to 250 mm above bed level. This order of magnitude of bed level change, even within the context of the detailed model area, would be sufficiently small that the impacts on coastal processes would not be discernible in the model output. Numerical models simulate tidal flow and wave climates using iterative techniques where mass and momentum are balanced across the model domain until the result falls within a tolerance and model closure is reached. When models which are very similar to one another, but not identical, such as when a very small change in bathymetry is applied in a small region of the model, the difference between the two sets of results due to the change in bathymetry is in the same order of magnitude as that related to model closure. The application of modelling would therefore not be appropriate in this case. Therefore, as outlined in the Applicant's response (REP1-056.181 in Appendix to Response to WRs: NRW REP2-080), the modelling of shallow water cable protection was not included in the study, and further modelling would not be appropriate. NRW agrees with the numerical modelling approach and scenarios conducted in relation to hydrodynamics, waves and sediment transport to inform the potential changes on Constable Bank, Menai Strait and Conwy SAC and the adjacent coast arising from the construction, operation and decommissioning of Mona Offshore Wind Project (see REP1-056.177 in Appendix to Response to WRs: NRW (REP2-080)). NRW guidance (Pye *et al.,* 2017) advises on the importance of determining whether or not numerical modelling is needed and/or feasible. The modelling study undertaken and presented in Volume 6, Annex 1.1: Physical processes technical report (PP-086) comprised only those aspects of the Mona Offshore Wind Project for which modelling is an appropriate tool to quantify potential impacts on physical processes. The Applicant's approach to coastal processes modelling has therefore been undertaken in accordance with this guidance (as outlined in Volume 2, Chapter 1 Physical processes (APP-053). The particular type of cable protection noted in Q1.14.1 relates to cable protection being placed over the four trenchless drilling exit pits. Cable protection measures will be tailored to the specific location, noting that installation below the bed level within the pit and adjacent seabed sediments may be undertaken to ensure compliance with the commitment to limit change in water depth to 5% (unless otherwise approved by Licensing Authority in consultation with the Maritime Coastguard Agency) which ensures that cable protection does not impact physical processes in the nearshore environment. Additionally, the Applicant is committed to conducting a detailed

Reference	Question to	ExQ1	Applicant's response
			Cable Burial Risk Assessment and Burial Assessment Study - further information is provided in the Applicant response to Q1.7.4. The Cable Burial Risk Assessment and Burial Assessment Study will identify the risks to the offshore export cables (e.g. from sediment mobility), include details of target burial depths and provide further information on the Applicant's approach to defining the need for cable protection and the type(s) of protection to be used if necessary to safeguard the resilience of the Mona Offshore Export Cables to coastal processes and climate change. In terms of resilience to coastal change, as documented in row RR-011.52 of the Applicant's Response to Relevant Representations (PDA-008), geotechnical site investigations were undertaken in 2022 and 2023 to confirm the technical feasibility of, and commitment made to, the use of trenchless techniques under the intertidal area as set out in section 1.4 of the Outline Landfall Construction Method Statement (LCMS) (REP2-066). Further detailed onshore and offshore geotechnical investigations will be conducted at the landfall, including establishing the depth of burial requirements to avoid the risk of exposure and resilience to seabed evolution and climate change. Details of the final design will be included within the final LCMS submitted to the relevant planning authority following consultation with NRW as secured in Schedule 2, Requirement 9 of the draft DCO (REP2-004).
Q1.14.2	*NRW (A)*	***Trenchless Techniques*** *Paragraph 220 of [REP1-056] states that the commitment to securing trenchless techniques in the intertidal area is not explicit enough in the MLPD [REP2-028].* *Can you provide a form of wording that would rectify this concern.*	The marine licence principles document (Document Reference REP2-028) does not secure anything. Its purpose is to assist the Examining Authority and NRW's marine licencing team to understand how the deemed and standalone marine licences are anticipated to align and any expected areas of difference in their drafting. The securing of trenchless techniques at the intertidal area is through the Outline Landfall Construction Method Statement (LCMS) (REP2-066) and Requirement 9 of the draft DCO (REP2-004).
Q1.14.4	The Applicant / *NRW(A)*	**Sandwave Recovery Monitoring** [REP1-056] reiterates NRWs request that sandwave recovery monitoring should be included in post installation surveys, particularly on Constable Bank which would support statements as well as to help inform future work. The ExA notes that the Applicant	The Offshore in-principle monitoring plan (APP-201), section 1.5.2.1, outlines the approach to geophysical and geotechnical surveys for engineering and design-related studies. This monitoring will be undertaken to observe the effect of sediment transport and sediment transport pathways on cable burial with specific reference to physical processes. The primary function of this monitoring is to examine changes to the seabed post-construction, and the surveys will be expected to focus on areas where active mobile seabed features, such as sandwaves, have been identified

Reference	Question to	ExQ1	Applicant's response
		does not consider this necessary as no significant effects were to be predicted. Applicant: Paragraphs 2.8.83 and 2.8.85 of NPS EN-3 state, that where requested by the SoS, applicants are required to undertake geomorphological surveys both prior to and during construction and operation which would enable an assessment of the accuracy of the original predictions and improve the evidence base for future mitigation and compensation measures to enable better decision making in future EIAs and HRAs. Can the applicant provide further justification, in light of these paragraphs, as to why it feels this would not be appropriate in this instance despite the request by NRW. *NRW:* *Monitoring would be undertaken to observe the effect of sediment transport and sediment pathways on cable burial as outlined in Table 1.2 of the Offshore in-principle monitoring plan [APP-201]. Would this address your concerns or could amendments be made to this to address your concerns?*	(e.g. those areas that underwent sandwave clearance during the construction phase). The Applicant has already included a commitment to pre- and post-construction geomorphological surveys in Condition 24(4) and 26(3) of Schedule 14 of the draft DCO (REP2-004), and this is also expected to be secured within the standalone Marine Licence. While the Mona Offshore Wind Project application did not identify any potential significant effects on physical processes and, therefore, monitoring to test the predictions of the impact assessment is not required (as outlined in section 1.9.7 of Volume 2, Chapter 1 Physical processes (APP-053), the Applicant confirms that the hydrographic and side scan sonar surveys already committed to and the relevant data gathered will be considered in the context of sandwave recovery, particularly in relation to the Constable Bank, for information purposes. The Applicant has no objections to sharing this information with the relevant licensing authorities as part of the post-consent offshore monitoring plan. The commitment to develop a monitoring plan in accordance with the Offshore in-principle monitoring plan (APP-201) is secured under condition 18(1)(c) in Schedule 14 of the draft development consent order (DCO) (REP2-004). The surveys already committed to by the Applicant will highlight any morphological changes to the seabed, improving the evidence base for future mitigation in accordance with NPS EN-3 paragraphs 2.8.83 and 2.8.85 and best practice guidance and principles outlined in section 1.3 of the Offshore in-principle monitoring plan (APP-201).

2.13 Navigation and Shipping

Table 2.13: Response to ExQ1: Navigation and Shipping Questions

Reference	Question to	ExQ1	Applicant's response
Q1.15.2	*CLdN RoRo Ltd*	***Safety of navigation, search and rescue, and adverse weather routeing*** *The Applicant responded to your Relevant Representation in Table 2.8 of [PDA-008]. Can you respond* *to the following questions, providing justification for responses:* • Do you agree with the Applicant's conclusion [APP-059] that whilst there would be a residual risk over the baseline as a result of the Proposed Development, all hazards have been reduced to As Low As Reasonably Practicable (ALARP)? • Do you agree with the Applicant's conclusion that impacts on emergency responses (such as those to marine casualties) would be of minor adverse significance? • Do you agree with the Applicant's conclusion that for both the Mona project alone and cumulatively, the impacts on adverse weather routeing would be of minor adverse significance? Do you wish to make any further submissions on the shipping and navigation effects of the Proposed Development?	The Applicant has engaged with CLdN RoRo Ltd (formerly Seatruck Ferries) between 2021 and 2024 with regards to the Navigation Risk Assessment (APP-098), and notes that CLdN RoRo Ltd attended both hazard workshops (October 2022 and September 2023) and conducted full bridge simulations (September 2022 and June 2023). Following the revisions to the Mona Array Area post-PEIR, consensus was reached with CLdN RoRo Ltd that the Mona Offshore Wind Project, both individually and cumulatively with the Morgan and Morecambe Generation Assets would not result in unacceptable risks to navigation and that such risks would be As Low As Reasonably Practicable (ALARP). The Applicant also notes that CLdN RoRo Ltd do not typically operate north of the Isle of Man (see Figure 1.32 of the Navigation Risk Assessment APP-098) and therefore would be relatively unaffected by the cumulative risks posed by the addition of the Scoping Boundary of Mooir Vannin Offshore Wind Limited. The Shipping and Navigation chapter (APP-059) noted that with the Mona Array Area, the CLdN RoRo Ltd route between Heysham and Dublin would necessitate a minor deviation to increase the passing distance from the Mona Array Area, an additional steaming time of 0.3 minutes on an eight-hour passage, which the Applicant considers minor. Other routes operated by CLdN RoRo Ltd pass clear of the Mona Array Area. The Applicant has reached out to CLdN RoRo Ltd since submission to notify them of the Examination progress and seek to discuss any outstanding residual concerns but has not received a response since 01 March 2024. The Applicant also notified CLdN RoRo Ltd of ExQ1.15.2 on 16 September 2024 but has not received a response as of 30 September 2024.
Q1.15.4	The Applicant	**Update on engagement with Isle of Man Steam Packet Company** • Further to the summary provided at ISH2 [REP1-010], can the Applicant provide an update on its ongoing discussions	The Applicant has exchanged correspondence and met with the Isle of Man Steam Packet Company multiple times since submission: Engagement on these residual effects is ongoing and further meetings are planned.

Reference	Question to	ExQ1	Applicant's response
		with the Isle of Man Steam Packet Company in respect of the likely significant effects on adverse weather routeing? To what extent are the Applicant's assessment conclusions and approach to mitigation agreed?	
Q1.15.5	The Applicant	**Marine Navigation Engagement Forum** With respect to offshore vessel traffic management and co-existence with other offshore activities, the Applicant states that it has committed to continuing the Marine Navigation Engagement Forum (MNEF) in the post-consent stage [PDA-008], ref RR-019.5 and [REP2-078], ref REP1-072.8. Table 7.17 of [APP-059] states that this is secured through the Mitigation and Monitoring Schedule [REP2-030], however this appears not to be the case. • Where is this commitment secured? • What are the terms of reference for the MNEF in the post-consent phase? For example, what would be its role and purpose, how regularly would the forum meet, would membership change in any way and do you envisage a role for the MNEF in both the construction and operational phases of the project? • Given the prevalence of other offshore activities in the vicinity of the proposed array and export cable areas, does the detail of this commitment need to be more clearly set out in the dDCO or a secured management plan?	The Mitigation and Monitoring Schedule (J10 F03) has been updated and submitted at Deadline 3 to correct the omission of the commitment to continued engagement of the MNEF post consent. The Outline Vessel Traffic Management Plan (J14 F02) has also been updated and submitted at Deadline 3 to reference this commitment for clarity. Invites to the MNEF meetings pre-Application included Terms of Reference (ToR) which are summarised in the Technical Engagement Plan (APP-041). The purpose of these meetings is "*to provide a platform for the exchange of information, knowledge and experience that will enable marine developers, and relevant shipping and navigation (S&N) stakeholders to coexist in the marine environment. Specifically, the MNEF will focus on matters relating to: • Risk to safety of marine operations and navigation, Impact on marine operations and navigation. The MNEF will aim to ensure that the views and needs of relevant S&N stakeholders and marine developers are discussed and considered during the pre-construction, construction, operation, pre-decommissioning and decommissioning phases of the Projects*." It is anticipated that the ToR for post-consent meetings would be similar and the meetings would continue through pre-construction, construction, and operations and maintenance phases. Membership of the MNEF is open to all users of the eastern Irish Sea and therefore the membership could change to reflect new marine operators and interested parties in the eastern Irish Sea. It is anticipated that marine contractors operating for the Mona Offshore Wind Project would also attend. The frequency of MNEF meetings is not yet determined but are anticipated to change in frequency through the Mona Offshore Wind Project lifecycle, meeting more regularly through construction and less frequently during operations and maintenance, reflective of the relative activities. The Applicant anticipates that the

Reference	Question to	ExQ1	Applicant's response
			frequency of MNEF meetings pre-construction will be agreed with the group at the first meeting post-consent when the Applicant has a better understanding of the pre-construction programme and programme for preparation of key pre-commencement documents such as the Vessel Traffic Management Plan.
Q1.15.6	The Applicant	**Coordination with the Ørsted IPs** How do you respond to the submissions of the Ørsted IPs that additional engagement beyond the MNEF is required going forward [REP2-104], section 3?	As described within the Applicant's response to Ørsted IPs Written Representations at Deadline 2 (Section 2.9 of Response to Written Representations REP2-078), the Applicant believes that a comprehensive assessment of shipping and navigation impacts has been undertaken which has included input from both existing offshore wind developers in the eastern Irish Sea and operators familiar with navigating adjacent to existing offshore wind farms. The Applicant has committed within Volume 2, Chapter 7: Shipping and navigation (APP-059) to continue the Marine Navigation Engagement Forum (MNEF), which includes Ørsted IPs and other offshore wind energy developers, post-consent and is secured within the updated Mitigation and Monitoring Schedule (J10 F03) and referenced in the Outline Vessel traffic management plan for clarity (J14 F02), both submitted at Deadline 3. The MNEF will be used to update stakeholders on the Mona Offshore Wind Project and also be used for engagement on shipping and navigation mitigations set out within Table 1.10 and Table 1.43 of the Navigational Risk Assessment (Volume 6, Annex 7.1: Navigational Risk Assessment APP-098). In particular, the MNEF will facilitate the development of the Vessel Traffic Management Plan (secured within the deemed Marine Licence within the draft DCO and in accordance with the Outline Vessel Traffic Management Plan J14 F02) to safely manage Mona Offshore Wind Project construction and operations and maintenance activities and reduce adverse impacts on other marine users, which would include other offshore wind farm operators. On this basis, the Applicant does not believe that further engagement with Ørsted IPs beyond the post consent MNEF meetings is necessary.
Q1.15.8	The Applicant	**Cumulative effects including Mooir Vannin** • Has there been any change to the publicly available information about the	The Application noted that a Scoping Report was issued for the Mooir Vannin Offshore Wind Farm on the 18 October 2023. This included a Scoping Boundary which is the same as the Agreement for Lease Area assessed as part of the Cumulative Regional Navigational Risk Assessment Appendix D included within the Navigation Risk Assessment (APP-098). Since then, the Applicant is aware that

Reference	Question to	ExQ1	Applicant's response
		likely geographical extent and environmental effects of the proposed Mooir Vannin Offshore Wind Farm since submission of the Mona DCO application? • If so, is any update to the assessment of cumulative effects for the Mona project, particularly in relation to collision and allision risk, necessary?	Mooir Vannin Offshore Wind Farm Limited updated Preliminary Environmental Information on their website on the 17 June 2024 (https://orsted.im/mooirvannin/document-library). This included a minor amendment to the Offshore Electrical Infrastructure Study Area but no change to the array area. In addition, a two page shipping and navigation note was provided which summarised the vessel traffic surveys undertaken. As no change was proposed to the array area and no further assessment was provided, the Applicant does not believe that any update to the Cumulative Regional Navigational Risk Assessment is necessary. The Applicant expects that the application for the Mooir Vannin Offshore Wind Farm will contain a navigation risk assessment, including an assessment of the cumulative effects with the Irish Sea Round 4 projects, when it is submitted, as reported on their website as early 2025 (https://orsted.im/mooirvannin).
Q1.15.11	The Applicant, *MCA*	**Cumulative allision and collision risk** REP1-029 records agreement that "Allision and collision risk hazards between the Morgan Array Area and Mooir Vannin Scoping Boundary are unacceptable based on the findings of the Cumulative Regional Navigational Risk Assessment Appendix D (APP-098)" (ref MCA-SAN.28). This reflects the conclusions of the ES, as recorded in [APP-059]. What are the implications of this finding in light of para 2.8.331 of NPS EN-3?	The Applicant notes the relevant provisions of the NPS state that where unacceptable risks to navigational safety are identified, projects should not be consented (Paragraph 2.8.331). The Applicant recognises that the findings of the cumulative assessment (as reported in Section 7.11.7 and 7.11.8 of APP-059 and Appendix D of the Cumulative Regional Navigational Risk Assessment Appendix D) identify unacceptable risks to navigational safety when considered cumulatively with the Mooir Vannin Offshore Wind Farm as proposed at scoping. The Applicant notes, however, that in the Scoping Report by Mooir Vannin Offshore Wind Farm Limited (2023), it states that the Shipping and Navigation impact assessment will be undertaken in line with the MCA MGN 654 and its 'Methodology for Assessing Marine Navigational Safety and Emergency Response Risks'. It is therefore assumed that, in line with accepted EIA practice, potential cumulative impacts will be considered by Mooir Vannin Offshore Wind Farm in its assessment and through the relevant planning process for that application. Furthermore, the Applicant would like to reiterate the following key points. Firstly, where unacceptable hazards were identified during the NRA undertaken to support the PEIR, the Mona Offshore Wind Project, in collaboration with Morgan Generation Assets and Morecambe Generation Assets, sought to mitigate these impacts through revisions to the boundaries of their respective Projects which was

Reference	Question to	ExQ1	Applicant's response
			shared with stakeholders in January 2023. The Applicant incorporated the Mooir Vannin Offshore Wind Farm as a Tier 3 project at PEIR (following the Planning Inspectorate's Advice Note Seventeen) but had insufficient information to meaningfully address any potential cumulative effects. Secondly, the NRA undertaken to support the Application, including updated navigation simulations and a hazard workshop, included the Mooir Vannin Offshore Wind Farm once appropriate information was received. This included information provided by Mooir Vannin Offshore Wind Limited on the array area boundary received on 01 September 2023. At this stage, navigation simulations had already been carried out with Stena Line and CLdN RoRo Ltd. However, the information was received in time to be included in navigation simulations with the Isle of Man Steam Packet Company and within the hazard workshop. Despite the fact that the Scoping Report for the Mooir Vannin Offshore Wind Farm was not published until the 18 October 2024, after completion of the NRA, Mooir Vannin Offshore Wind Farm was treated as a Tier 2 Project (following the Planning Inspectorate's Advice Note Seventeen) and assessed appropriately. Thirdly, the Applicant notes that as per Appendix D of the Cumulative Regional Navigation Risk Assessment (APP-098), those unacceptable hazards are solely related to passages between other existing and proposed offshore wind farms. As such, the contribution of the Mona Offshore Wind Farm to these unacceptable risks is negligible. A Statement of Common Ground has been agreed between the Applicant and the MCA and submitted at Deadline 3 that confirms their agreement to the conclusions of the NRA and CRNRA (Cumulative Regional Navigation Risk Assessment).
Q1.15.12	The Applicant, *MCA*	**Exceptions to the Critical National Priority presumption** The Planning Statement [APP-186] considers the exceptions to the CNP presumption set out in NPS EN-1 para 4.1.7 but concludes that "none of the above	The Applicant notes the provisions of the NPS EN-1 Paragraph 4.1.7. <u>Unacceptable risk to human health and public safety</u> The conclusion of the Shipping and Navigation assessment (APP-059) is that the Mona Offshore Wind Project would not pose an unacceptable risk to human health and public safety, and that all navigational hazards have been reduced to As Low As

Reference	Question to	ExQ1	Applicant's response
		exceptions apply to the Mona Offshore Wind Project" To the Applicant, for the avoidance of doubt: • Is it your position that the likely significant effects on navigation and shipping from the project alone and cumulatively identified in [APP-059] (including cumulative collision and allision risk effects) would not present an unacceptable risk to, or interference with, human health and public safety? If so, provide further justification for this position • Is it your position that the likely significant effects on navigation and shipping from the project alone and cumulatively identified in [APP-059] (including cumulative collision and allision risk effects) would not present an unacceptable risk to, or unacceptable interference offshore to navigation? If so, provide further justification for this position. *To the MCA:* *Do you wish to comment on these matters?*	Reasonably Practicable (ALARP). The draft Statement of Common Ground with the MCA submitted at Deadline 3 (S_D1_26 F02) confirms this conclusion. Whilst unacceptable hazards are identified when considered cumulatively with other Tier 1 and Tier 2 projects, the Applicant reiterates its response to Q1.15.11 above, in particular noting that the Mona Offshore Wind Project has a negligible contribution to these unacceptable hazards, given they relate to passages between other existing and proposed offshore wind farms. The Applicant also believes that the Examining Authority is able to recommend a project in isolation whilst noting potential navigational safety impacts with adjacent proposed cumulative projects, particularly those at an earlier stage of development. The Applicant refers to the Walney Extension Recommendation Report (EN010027) whereby the Examining Authority concluded that the "*impact of the proposed Walney Extension in isolation was not significant*" (4.408), but that there were residual concerns that the "*approval of the proposed Walney Extension may have implications for the extent to which it will be possible to develop the NEPDA without significant adverse impacts on shipping*" (4.407). The Applicant therefore believes that the Secretary of State should be satisfied that the risk to navigational safety associated with the Mona Offshore Wind Project is ALARP and that it does not pose an unacceptable risk to human health and public safety. <u>Unacceptable risk to, or unacceptable interference offshore to navigation</u> The Applicant's position is that, whilst moderate adverse effects are concluded on strategic routes and lifeline ferry services (APP-059), they do not amount to unacceptable interference as per NPS EN-1 paragraph 4.1.7. Firstly, as concluded in Section 7.9.2 and Section 7.11.2 of the Shipping and Navigation chapter (APP-059), the Mona Offshore Wind Project would, both in isolation and cumulatively with other Tier 1 and Tier 2 developments, not interfere with recognised sea lanes essential to international navigation as per NPS EN-3 Paragraph 2.8.326/2.8.327. This was agreed with the MCA in the draft Statement of Common Ground submitted at Deadline 3.

Reference	Question to	ExQ1	Applicant's response
			Secondly, Paragraph 2.8.328 of NPS EN-3 notes the requirement that "*site selection has been made with a view to avoiding or minimising disruption or economic loss*". As described in the NRA (APP-098) and Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-016), the Mona Offshore Wind Project has made substantial changes to the Mona Array Area to avoid and minimise disruption to operators. Indeed, as shown in Figure 7.6 of Volume 2, Chapter 7: Shipping and Navigation (APP-059), the only ferry route passage plan which directly intersects the Mona Array Area is the Stena Line route between Liverpool and Belfast (when passing west of the Isle of Man). Thirdly, Paragraph 2.8.329 of NPS EN-3 notes that the "*Secretary of State should give these adverse effects substantial weight in its decision making*". This makes clear that the Secretary of State could still grant development consent with adverse effects on such routes, when considered with the wider benefits of a project. This can be contrasted to Paragraph 2.8.326 which states that the "*Secretary of State should not grant…*" in relation to recognised sea lanes essential to international navigation. Fourthly, the Shipping and Navigation assessment (APP-059) concludes that the Mona Offshore Wind Project would have a moderate adverse effect in adverse weather conditions on the Isle of Man Steam Packet Company route between Liverpool and Douglas (Section 7.11.4). This constitutes an additional delay of approximately 13 minutes on an existing delay on average of between 10 and 33 minutes, based on analysis of two years of data from the Automatic Identification System. The Applicant is not aware of any precedent by which "appreciably longer transit times" as per Paragraph 2.8.329 of NPS EN-3 has been quantified and has therefore sought to assess this on a precautionary basis considering the relative increase in transit duration compared to existing fluctuations in transit duration and turnaround times in ports experienced by operators. It should be emphasised that this moderate adverse effect does not conclude that all such sailings would be cancelled, and the Applicant believes that in most cases short term delays would be experienced. Furthermore, as shown in Figure 1.32 of the NRA (APP-098), vessels navigating the route between Liverpool and Douglas in adverse weather have on occasion taken the exact route required to pass clear of the Mona Array Area, taking advantage of the shelter offered by the Welsh coast. Therefore, such deviations are demonstrably practical and safe. The Applicant also notes that this impact relates to

Reference	Question to	ExQ1	Applicant's response
			approximately only 30 of 600 sailings per year and therefore constitutes only a small proportion of the crossings on this route. As such, given a small increase in delays to a minority of sailings, the Applicant believes that this does not constitute an unacceptable impact as per NPS EN-1 Paragraph 4.1.7. Fifthly, the Applicant also notes that development consent has been granted to other offshore wind projects which have had comparable deviations to those of the Mona Offshore Wind Project. For example, as noted within the S42 response by the Isle of Man Steam Packet Company, the West of Duddon Sands offshore wind farm resulted in a delay of five minutes per sailing to the Heysham to Douglas route. The Application for the Hornsea Two Offshore Wind Farm noted an impact of 7.5 minutes per crossing for the DFDS ferry route between Newcastle and Amsterdam (EN010053). Sixthly, when considered cumulatively with adjacent proposed offshore wind projects, the assessment notes that further moderate adverse effects would result from the addition of the Morgan Generation Assets, Morecambe Generation Assets and Mooir Vannin Offshore Wind Farm Scoping Boundary. Those routes impacted are the Isle of Man Steam Packet route between Heysham and Douglas, the Stena Line Liverpool to Belfast route (east of the Isle of Man) and the Stena Line Heysham to Belfast route, all of which would not be impacted by the Mona Array Area. Therefore, the Applicant asserts that the Mona Offshore Wind Project does not have a direct adverse impact on those routes. Finally, the Applicant notes that NPS EN-3 recognises that "*it is inevitable that there will an impact on navigation in and around the area of the site*" (Paragraph 2.8.178). The Applicant also notes NPS EN-3 Paragraph 2.8.183 which reflects that there may be "*some situations where reorganisation of shipping traffic activity might be both possible and desirable when considered against the benefits of the wind farm*". As mentioned above, the Shipping and Navigation assessment (APP-059) has demonstrated that amendments to passage plans for affected operators are both practical and safe. The Applicant also notes that the benefits of the Mona Offshore Wind Project are also significant, as detailed within the Planning Statement (J2 APP-186) and should be considered against the impact on operators: • Part 2 of NPS EN-1, specifically Paragraph 3.3.58 outlines the "*urgent need for new (and particularly low carbon) electricity Nationally Significant Infrastructure*

Reference	Question to	ExQ1	Applicant's response
			Projects to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy". • Section 1.4.3 of the Planning Statement (J2 APP-186) notes that there is a need to reduce greenhouse gas emissions and Section 1.4.4 notes the need to meet future increases in electricity demand. • Furthermore, as detailed in Volume 4, Chapter 3: Socio-economics chapter (APP-078), the construction and operations and maintenance of the Mona Offshore Wind Project will result in beneficial effects to the employment and the economy.
Q1.15.13	The Applicant	**Monitoring of shipping and navigation effects** Table 1.5 of the Offshore In-Principle Monitoring Plan identifies the Applicant's monitoring commitments in relation to potential shipping and navigation effects, as secured in Conditions 18, 24, 25 and 26 of the DML [REP2-004]. In the event that the construction or post-construction monitoring of impacts on vessel routeing and safety found that the impacts were greater than those predicted in the Navigational Risk Assessment, what mechanism is there for adaptive management of the project to respond to those greater than predicted effects?	The Applicant has committed within Table 7.27 of the Shipping and Navigation chapter (APP-059) to this mitigation measure which is secured in conditions of the deemed marine licence (REP2-004). The Applicant notes the requirements of Section 6.6 of the MCA's Marine Guidance Note (MGN) 654 which states the following: *"b. The main purpose of vessel traffic monitoring is to be able to ensure the Navigation Risk Assessment (NRA) for the project is accurate for the construction and operation phase; that the predictions made in the NRA with regards to the traffic patterns are accurate, and to ensure the mitigation measures are effective and remain fit for purpose."* The Applicant considers it has conducted a robust Navigational Risk Assessment (APP-098) in full compliance with the guidance and consultation with stakeholders. Therefore, the Applicant believes that it is unlikely that the monitoring would identify any significant deviation to the findings of the NRA. Were such effects identified, the Applicant notes that paragraph d. of MGN654 Section 6.6 states that "*the MCA would expect the opportunity to discuss any changes identified as part of this monitoring, since the submission of the NRA*." As such, the Applicant anticipates engaging with the MCA to determine the significance of these changes and the likely requirement for adaptive management. The Applicant would be able to address operational issues through amendments to the Vessel Traffic Management Plan, an outline of which is submitted as part of the Application (J14 F02). As the MCA is the navigational authority for the eastern Irish Sea, many of the further mitigation measures identified but not adopted (such as

Reference	Question to	ExQ1	Applicant's response
			amendments to routeing measures) would be managed by the MCA and not the Applicant, in the unlikely event they were deemed necessary for addressing an identified impact upon navigational safety.

2.14 Noise and Vibration

Table 2.14: Response to ExQ1: Noise and Vibration Questions

<table>
<tr><th>Reference</th><th>Question to</th><th>ExQ1</th><th>Applicant's response</th></tr>
<tr><td>Q1.16.2</td><td>The Applicant</td><td>Glascoed Road
Can you either comment on or signpost where you have considered the potential noise impact of construction traffic, both individually and cumulatively, on residents along Glascoed Road?</td><td>Construction traffic flows for the Mona Offshore Wind Project and cumulative projects are set out in Volume 3, Chapter 8: Traffic and Transport [APP-071]. The road links nearest to residents along Glascoed Road are:
• Link 19: B5381 Glascoed Road between Engine Hill and Ffordd William Morgan
• Link 20: B5381 Glascoed Road between Ffordd William Morgan and National Grid Substation access
As set out in Volume 3, Chapter 8: Traffic and Transport [APP-071]) traffic flows are predicted to increase on these routes due to construction traffic both in the project alone and cumulative scenarios. The percentage change in daily traffic flows due to the Mona Offshore Wind Project and cumulative projects is set out below:
<table>
<tr><td rowspan="2">Link</td><td colspan="2">Percentage change in daily traffic flows</td></tr>
<tr><td>Mona Offshore Wind Project</td><td>Cumulative</td></tr>
<tr><td>19</td><td>14</td><td>29</td></tr>
<tr><td>20</td><td>6</td><td>7</td></tr>
</table>
Appendix C of Volume 7 Annex 9.2: Construction Noise and Vibration Technical Report [APP-179] reports the following noise impacts on Glascoed Road due to construction traffic associated with the Mona Offshore Wind Project:
• Link 19: Low impact (noise change 1dB)
• Link 20: Negligible impact (noise change 0dB):
In the cumulative scenario the noise change is likely to increase on link 19, however the impact would be still be low.</td></tr>
</table>

2.15 Offshore Biodiversity, Ecology and Natural Environment – Benthic Subtidal and Intertidal Ecology

Table 2.15: Response to ExQ1: Benthic Subtidal and Intertidal Ecology Questions

Reference	Question to	ExQ1	Applicant's response
Q1.17.1	The Applicant	**Intertidal Important Ecological Features** As an assessment on temporary habitat loss/disturbance of intertidal Important Ecological Features (IEFs) has not been carried out, can you confirm how no maintenance activities in the intertidal zone would be secured (during the operational phase).	The Mitigation and Monitoring Schedule (J10 F03) submitted at Deadline 3 and the Outline Landfall Construction Method Statement (REP2-066) make a commitment for trenchless techniques to be undertaken under the intertidal area from seaward of mean low water springs, where the exit pits will be located, to onshore, to ensure that direct impacts to ecologically sensitive intertidal habitats will not occur. This commitment means the trenchless technique will have entry / exit pits seaward of mean low water springs and landward of mean high water springs. The export cables will be in a duct buried underground between these two points. The Applicant does not anticipate any maintenance of the cables buried below the intertidal zone will be required during the operations and maintenance phase and, as such, is not included in Volume 1, Chapter 3: Project Description (APP-050). In the highly unlikely event that access to the intertidal area was required for inspections/maintenance and this constituted a licensable activity, a separate Marine Licence would be applied for these works.
Q1.17.2	*NRW (A)* *JNCC* *NWWT*	***Significance of effects*** *Table 2.36 in ES Chapter 2 (Vol 1) Benthic subtidal and intertidal ecology [APP-054] presents a summary of the potential impacts, the associated important ecological features, and significance of effects.* i) *If you disagree with any listed aspect including Applicant's significance of effects, can you identify and provide evidence to justify your opinion.* *If you consider any effect to be significant in terms of EIA, can you identify and advise on any possible and realistic mitigation measures to enable residual effects to be not significant in terms of EIA.*	The Statement of Common Ground (SoCG) between Mona Offshore Wind Project and NRW (A) submitted at Deadline 1 (Mona and Natural Resource Wales (advisory) Offshore SoCG (REP1-025)) confirms that, in relation to the assessment of the effects on benthic subtidal and intertidal ecology from the Mona Offshore Wind Project alone, there is only one ongoing point of discussion. This relates to clarification requested by NRW (A) regarding the assessment of cable protection in the nearshore zone. The Applicant has provided a detailed response to address this point at Deadline 2 (REP2-078) in its Response to Written Representations (see Appendix to WRs: NRW (REP2-078) rows REP1-056.182 and REP1-056.190).

Reference	Question to	ExQ1	Applicant's response
Q1.17.3	*NRW (A)* *JNCC* *NWWT*	***Cumulative effects*** *Table 2.37 in ES Chapter 2 (Vol 1) Benthic subtidal and intertidal ecology [APP-054] presents a summary of the potential cumulative effects, the associated important ecological features, and significance of effects.* i) *If you disagree with any listed aspect including Applicant's significance of effects, can you identify and provide evidence to justify your opinion.* *If you consider any effect to be significant in terms of EIA, can you identify and advise on any possible and realistic mitigation measures to enable residual effects to be not significant in terms of EIA*	The SoCG between Mona Offshore Wind Project and NRW (A) submitted at Deadline 1 (Mona and Natural Resource Wales (advisory) Offshore SoCG (REP1-025)) confirms that NRW (A) are in agreement with the assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects.
Q1.17.4	*JNCC*	***Marine Benthic Impact Assessment*** *If you disagree with the Applicant's marine benthic impact assessment, can you summarise your position. Can you also provide information and reference to any legislation including relevant projects to justify the need to distinguishing between the inshore (within 12nm) and offshore (beyond 12nm) to assess marine benthic impacts. (JNCC RR-033.3 response to relevant representation [REP2-097]).*	The Applicant notes that this question is directed at the JNCC but would highlight that the Applicant has provided a detailed response to this in its Response to JNCC D2 Submission (S_D3_4) (see REP2-097.65) submitted at Deadline 3.
Q1.17.5	The Applicant	**JNCC D2 submissions** Can you summarise your approach to resolve JNCC benthic ecology comments and concerns received at Deadline 2 [REP2-097].	Following receipt of the JNCC's Written Representation (REP1-066) and the JNCC's Deadline 2 Submission - Response to Relevant Representation Comments (REP2-097), the Applicant met with the JNCC on 4 September 2024. This meeting provided greater clarity to the Applicant on the key outstanding issues for the JNCC, which relate to: • the split of assessments between the offshore and inshore environments (see also response to Q1.17.4 above); • the development of the maximum design scenario; • the assessment of the seapens and burrowing megafauna communities IEF; and • the assessment of decommissioning impacts.

Reference	Question to	ExQ1	Applicant's response
			On all these outstanding matters, the Applicant has incorporated the feedback provided by the JNCC at the meeting in the further responses provided by the Applicant in the Response to JNCC D2 Submission (S_D3_4) submitted at Deadline 3. The Applicant will continue to engage with the JNCC on any outstanding matters ahead of the Issue Specific Hearings scheduled in October 2024. The Applicant would note that, as outlined in the JNCC's Deadline 2 Submission - Response to Relevant Representation Comments (REP2-097), issues relating to the potential impact of pile cuttings as well as rock dumping for jack-ups are now considered to be resolved.
Q1.17.6	The Applicant	**NPS EN-3** Can the Applicant advise how it has satisfied paragraph 2.8.123 which states "The applicant should demonstrate compliance with mitigation measures identified by The Crown Estate in any plan-level HRA produced as part of its leasing round".	Section 1.2.4 of the Habitats Regulations Assessment (HRA) Stage 1 Screening Report (REP2-012) outlines how The Crown Estate (TCE) Plan-Level HRA has been considered for the Mona Offshore Wind Project. TCE's Plan-Level HRA concluded that the possibility of an Adverse Effect on Site Integrity as a result of the Round 4 Plan could be ruled out for two protected sites forming part of the National Site Network. The two protected sites, and relevant features, are: 1) sandbank features of the Dogger Bank Special Area of Conservation alone and in-combination; and 2) black-legged kittiwake *Rissa tridactyla* feature of the Flamborough and Filey Coast SPA in-combination with other plans and projects only. The Mona Offshore Wind Project was not identified as a project required to be considered in the appropriate assessment for either of these sites. Therefore, no Adverse Effect on Site Integrity was identified for the Mona Offshore Wind Project in the Plan-Level HRA and there is no requirement for the Applicant to demonstrate compliance with mitigation measures identified by TCE in the plan-level HRA with respect to these sites and features. The key mitigation for offshore export cables within the Round 4 HRA is the consideration of the Export Cable Route Assessment (ECRA) and section 4.10.3 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-016) explains in full how the conclusions of the ECRA were taken into account within the siting of the Mona Offshore Cable

Reference	Question to	ExQ1	Applicant's response
			Corridor, and how key ecological designations were avoided where possible (taking into account feedback received from NRW) and the potential for interaction with designated species minimised.
Q1.17.7	The Applicant	**Outline Landfall Construction Method Statement [REP2-066]** Paragraph 1.10.6.5 states that the area of vegetated shingle bank associated with the Traeth Pensarn SSSI has been removed from the DCO order limits. However, your response to RRs RR-009.11 [PDA- 008] states that some areas of the SSSI are still included in the Onshore Development Area to allow access to the beach. Can you clarify and describe any measures that could be put in place to delineate and protect areas of the Traeth Pensarn SSSI included in the Order Limits.	As outlined in paragraph 1.10.6.5 of the Outline Landfall Construction Method Statement (REP2-066) submitted at Deadline 2, the route from the beach car park to Work Area No. 3 will be along the beach from the east, avoiding the piddock habitat and the vegetated shingle beach. The Applicant also notes that the precise route will have to change over time, subject to the tide. To ensure that vehicles avoid the designated habitats, the route will be defined prior to each visit, taking into account the tide. Construction staff will receive training on the location of the habitats and the routes to follow. This will be added to the Outline Landfall Construction Method Statement and submitted at Deadline 4.

2.16 Offshore Biodiversity, Ecology and Natural Environment – Marine Mammals

Table 2.16: Response to ExQ1: Marine Mammals Questions

Reference	Question to	ExQ1	Applicant's response
Q1.17.8	The Applicant	Can the Applicant summarise its approach to resolve NRW (A) concerns at Deadline 2 [REP2-099] that it has not calculated the number of animals disturbed from vessel noise. Can the Applicant undertake one of the two alternative approaches requested by NRW(A).	As outlined in NRW(A)'s Deadline 2 Submission (REP2-099), NRW(A) has one outstanding concern that relates to disturbance to marine mammals from underwater sound from vessel use. The Applicant has responded in detail to the comments made by NRW with respect to this in the Applicant's Response to NRW D2 Submission (S_D3_6) (see rows REP2-099.1 to REP2-099.4 of this document) submitted at Deadline 3. The Applicant maintains that the approach taken in the Environmental Statement is robust and accurate. Furthermore, the Applicant welcomes the comment from NRW(A) against REP2-099.4 (see the Applicant's Response to NRW D2 Submission (S_D3_6)) that NRW does not consider this matter to materially affect the overall assessment conclusions given the mitigation measures proposed. NRW(A) did, however, request one of two methodological approaches to be undertaken to address their outstanding concern (see REP2-099.3 in the Applicant's Response to NRW D2 Submission (S_D3_6) submitted at Deadline 3): 1) calculating numbers disturbed using the 4.08 km impact radius; or 2) use a dose response approach (e.g -24% at 3 km (Benhemma le Gall et al. 2021)) rather than assumption of 100% disturbance. The Applicant carried out further engagement with NRW to seek to resolve NRW(A)'s concerns and a meeting was held on 9 September 2024. NRW(A) subsequently provided additional written feedback via email (dated 10 September 2024), which included the following agreement from NRW(A): "*this methodological discussion does not materially impact our agreement with the overall conclusions that there will be no significant effect or adverse effect on marine mammal populations due to the mitigation methods that will be employed*", as committed to by the Applicant. The Applicant will look to capture this discussion in the next update to the Statement of Common Ground (SoCG) with NRW(A).

Reference	Question to	ExQ1	Applicant's response

The Applicant highlights that the number of animals disturbed by underwater sound from vessel use has been calculated (as presented in Table 4.44 in Volume 2, Chapter 4: Marine mammals (APP-056)) for a range from 1 to 7 km, which encompasses the modelled maximum impact range of 4.08 km. However, in order to address NRW(A)'s concerns raised in their Deadline 2 submission (REP2-099) with respect to underwater sound impacts from vessel use, the Applicant has carried out the alternative approach requested by NRW(A) (Approach 1) and presented the numbers of animals disturbed using the 4.08 km maximum modelled range, in comparison to the 7 km radius. This information is presented in the Applicant's Response to NRW D2 Submission at Deadline 3 (see REP2-099.1 to REP2-099.4 in S_D3_6) (the Applicant also highlighted here why approach 2 is less conservative). This additional assessment (repeated in Table 1 below for visibility to the Examining Authority) illustrated that the assessment presented in Volume 2, Chapter 4: Marine mammals (APP-056) was precautionary (using a larger 7 km impact radius derived from scientific literature) and that the conclusions of 'no significant effect' remain unchanged. The number of animals disturbed for the 4.08 km modelled range still assumes 100% disturbance rather than a dose response (approach 2), which would assume a proportional response to vessel sound and, therefore, remains precautionary. Using the 4.08 km modelled impact range as requested by NRW(A) illustrates that fewer animals would be disturbed compared to the 7 km impact range presented in the assessment (APP-056).

Species	No. of animals disturbed (7 km)	% of MU	No. of animals disturbed (4.08 km)	% of MU
Harbour porpoise	43	0.07%	15	0.02%
Bottlenose dolphin	1	0.09%	1	0.03%
Short-beaked common dolphin	1	0.0001%	1	0.00003%
Risso's dolphin	5	0.04%	2	0.01%
Minke whale	3	0.01%	1	0.004%
Grey seal	28	0.21%	10	0.07%
Harbour seal	1	0.01%	1	0.004%

Table 1: Number of animals disturbed for the 7 km radius used in APP-056,

Reference	Question to	ExQ1	Applicant's response
			compared to the number of animals disturbed using the 4.08 km modelled radius The Applicant also considered the second approach suggested by NRW(A) (dose response) in their Deadline 2 Submission (REP2-099) and demonstrated in the Applicant's Response to NRW D2 Submission (S_D3_6) at Deadline 3 (see REP2-099.1 to REP2-099.4) that using a dose response would reduce the number of animals estimated to be disturbed (leading to no animals disturbed at 4 km), and would not change the overall conclusion of the assessment. The Applicant has sought to resolve this matter with NRW(A) through the provision of further detailed justification and supplementary assessment information, as well as continued engagement throughout the examination process. The Applicant's and NRW(A)'s agreed position that the additional detail provided (as summarised here from the information presented in the Applicant's Response to NRW D2 Submission (S_D3_6) at Deadline 3) does not materially affect the conclusions of the impact assessment will be recorded in the next iteration of the Statement of Common Ground.
Q1.17.9	The Applicant *JNCC* *NRW(A)*	If scenario 1 involved excluding UXO clearance from the DCO and Deemed Marine Licence, and scenario 2 involved UXO clearance restricted to only low-order clearance charges; can parties advise if it would be supportive or not to either approach with reasoning.	The Applicant has committed to the mitigation hierarchy with respect to UXO clearance. This is centred on a staged approach (see Outline Marine Mammal Mitigation Protocol (MMMP) (APP-207)), in line with the Joint Nature Conservation Committee (JNCC) Joint Position Statement (which states "low noise methods of clearance should always be prioritised with high order clearance only to be used in exceptional circumstances") that follows: • Avoid UXO. • Clear UXO with low order techniques. • Clear UXO with high order techniques. The Applicant has committed to prioritising low noise clearance methods and using high order clearance only in exceptional circumstances but considers it is not practicable to remove high order UXO clearance from

Reference	Question to	ExQ1	Applicant's response
			the deemed Marine Licence (dML) (i.e. Scenario 2) of the draft development consent order (DCO). At this stage, prior to detailed site investigation surveys, the possibility of a high order UXO detonation cannot entirely be ruled out. Therefore, the Applicant has based the assessment on the worst case scenario (high order UXO clearance). The Applicant does not consider Scenario 1 (excluding UXO clearance entirely from the draft DCO) to be necessary or reasonable. Assessing a holistic and comprehensive view of all potential sources of injury from underwater sound (i.e. from piling, UXO clearance and geophysical surveys) is required; thus, excluding UXO clearance would overlook an important source of underwater sound. The Applicant notes that the JNCC agree to UXO clearance being included in the Outline Underwater Sound Management Strategy (APP-202) at this stage as the strategy represents a holistic view of all activities that may generate underwater sound (see row RR-033.56 in the Applicant's Response to Relevant Representations (PDA-008)). Further justification for why the Applicant does not consider either Scenario 1 or 2 to be acceptable is provided below. UXO clearance activities are controlled by Condition 21 in Schedule 14 (dML) of the draft DCO (REP2-004)) and expected to be secured in the standalone marine licence. The Applicant has highlighted in its Response to JNCC D2 Submission (S_D3_4) at Deadline 3 (see row REP2-097.37) that the DCO regime set out within the Planning Act 2008 is designed to remove the need for Applicants of nationally significant infrastructure projects to obtain multiple consents from various licensing authorities. Instead, the necessary consents, powers and rights can be included within the DCO, and this includes deemed marine licences. Requesting that the Applicant apply for a separate marine licence for UXO clearance activities (either wholly or for high order UXO clearance if required), particularly when such activities have been assessed within the Environmental Statement, is contrary to the intended purpose of the DCO regime.

Reference	Question to	ExQ1	Applicant's response
			As currently drafted, the dML does not permit any UXO clearance activities to be undertaken without the requirements of Conditions 20 and 21 in the dML first being complied with. Condition 20 requires an Underwater Sound Management Strategy (UWSMS) in accordance with the Outline UWSMS (APP-202) to be submitted to and approved in writing by the licencing authority in consultation with the JNCC. Condition 21 requires the following to be approved by the licencing authority in consultation with JNCC and the MCA (for the UXO method statement only): • a method statement including methodologies for the identification and investigation of potential unexploded ordnance targets, clearance of unexploded ordnance and removal and disposal of large debris, a plan showing the area in which clearance activities are proposed to take place and a programme of works. • a specific offshore written scheme of investigation and protocol for archaeological discoveries (which must accord with the details set out in the outline offshore written scheme of investigation and protocol for archaeological discoveries) and • a marine mammal mitigation protocol in accordance with the outline marine mammal mitigation protocol UXO clearance activities are, therefore, considered to be adequately controlled through the measures set out in the deemed marine licence.
Q1.17.10	The Applicant	Can the Applicant summarise its approach to resolve JNCC marine mammals comments and concerns received at Deadline 2 [REP2-097]	The Applicant has engaged with the JNCC throughout the Mona Offshore Wind Project examination, with detailed written responses to the JNCC's concerns and comments given: • At Deadline 1, in the Applicant's responses to the JNCC's Relevant Representation (RR) (PDA-008) in Table 2.33 (see rows RR-033.41 to 69). • At Deadline 2, in the Applicants responses to the JNCC's Written Representations (REP2-081) (see rows REP1-066.83 to 137). • At Deadline 3, in the Applicant's Responses to Response to JNCC D2 Submission (S_D3_4) (see rows REP2-097.37 to REP2-097.64).

Reference	Question to	ExQ1	Applicant's response
			The Applicant has also engaged with the JNCC to resolve concerns via the Statement of Common Ground (SoCG) process (see Table 1.6 in the Initial SoCG between Mona Offshore Wind Project and the JNCC (REP1-028)) and will continue to discuss any outstanding issues further at future meetings. This engagement will be captured in the next SoCG submission with the JNCC. As outlined in the Statement of Commonality (S_D1_7 F02) submitted at Deadline 3, the Applicant and the JNCC have agreed to postpone submission of an updated SoCG until Deadline 4. This is to enable parties time to fully digest recent submissions and allow further discussion ahead of the Issue Specific Hearings in October with the aim of resolving any outstanding concerns. The Applicant considers the main issues which remain to be resolved are the inclusion of UXO clearance in the draft DCO and the consideration of noise abatement systems within the Outline Underwater Sound Management Strategy (APP-202). **Inclusion of UXO in the DCO/dML** The JNCC has maintained their advice that UXO clearance should not be included as a licenced activity in the draft DCO and is instead applied for in a separate marine licence (as per RR-033.42, RR-033.51 and RR-033.52 in JNCC's Response to Relevant Representation Comments (REP2-097)). The Applicant has provided a further response to this in its Response to JNCC D2 Submission (S_D3_4) (see REP2-097.37, REP2-097.46, REP2-097.47) submitted at Deadline 3, in addition to the Applicant's response to JNCC's WRs (REP2-081) submitted at Deadline 2. The Applicant has also responded to a specific question from the Examining Authority (Q1.17.9) above which outlines the Applicant's position with respect to the consideration of UXO clearance in the draft DCO. **Separate Marine Mammal Mitigation Protocol for UXO** The JNCC suggested that a separate Marine Mammal Mitigation Protocol (MMMP) should be developed to support any future licence application for UXO clearance. Notwithstanding the Applicant's position on a separate marine licence for UXO clearance (as outlined in the response to Q1.17.9 above), the Applicant notes that a separate UXO MMMP will already be produced post-consent, in accordance with the Outline MMMP (APP-207), as per Condition 21(1)(c) of the dML (see draft DCO REP2-004) and therefore this matter can be considered to be resolved. The Applicant

Reference	Question to	ExQ1	Applicant's response
			reiterates that the Outline MMMP (APP-207) provides a robust framework to demonstrate that, regardless of the UXO size requiring clearance, a mitigation hierarchy will be implemented to minimise the risk of injury to marine mammals to a non-significant level in EIA terms and will be a holistic comprehensive document that covers all potential sources of injury from underwater sound (i.e. from piling, UXO clearance and geophysical surveys). **Consideration of noise abatement** The JNCC considers that noise abatement could be given more priority in the UWSMS and MMMP (see rows RR-033.43, RR-033.55 and RR-033.56 in the JNCC's Response to Relevant Representation Comments (REP2-097)). The Applicant has responded in detail in the Response to JNCC Deadline 2 Submission (S_D3_4) (see REP2-097.38 and REP2-097.50). The Applicant is aware of ongoing discussions between stakeholders and industry forums surrounding Noise Abatement Systems (NAS) but highlights that, at this point, guidance is not in the public domain. The Applicant has, nonetheless, agreed to consider NAS within the UWSMS (as set out in the Outline UWSMS (APP-207) as part of a holistic approach to ensuring no significant effects from underwater sound on marine mammals. The final UWSMS will look at the range of NAS technologies available at that time, in line with the latest underwater sound policy and best practice guidance. The Applicant emphasises that NAS will be considered as part of the development of the final UWSMS, demonstrating the commitment to using best endeavours to deliver underwater sound reductions for the Mona Offshore Wind Project, but its requirement should not be taken as definitive at this stage. The requirement for additional mitigation cannot be confirmed until post-consent, following detailed design refinements. If it is identified as being required, the review of mitigation options undertaken at that time (with the full understanding of the final project design, the latest mitigation technologies and in line with underwater sound mitigation policy and best practice guidance) will enable the most suitable mitigation to be identified. The final UWSMS, which will detail the mitigation measures, will be agreed upon with the licensing authority in consultation with the JNCC, prior to construction commencing. Consideration of NAS will be made as part of a stepped strategy post-consent and following the mitigation hierarchy - avoid, reduce, mitigate. When regulatory guidance on NAS is released (such as the requirement

Reference	Question to	ExQ1	Applicant's response
			for NAS or updates to Joint Position Statements, as described in JNCC's RR-033.56 in REP2-097), the Applicant will review and align the final UWSMS accordingly. The Applicant will continue to engage with the JNCC on any developments in terms of NAS guidance. **Issues considered resolved** The Applicant considers the following matters highlighted in JNCC's Response to Relevant Representation Comments (REP2-097) to be resolved with the JNCC as outlined in the Response to JNCC D2 Submission (S_D3_4) submitted at Deadline 3. Note that the Applicant's Response to the JNCC's Deadline 2 Submission (S_D3_4) references provided below relate to specific rows within the aforementioned document: • JNCC's confirmation of the Applicant's acknowledgement that a review of EDR ranges and potential new EDR ranges will be out this year (see REP2-097.39), new UXO mitigation guidelines will be available and should be used for UXO clearance licence applications and subsequent MMMPs (see REP2-097.40 and REP2-097.59) and an addendum to SNCB mitigation guidance for piling will be published (see REP2-097.41). The Applicant will review any new guidance when available. • HRA Stage 1 Screening Report errata, which the JNCC agrees does not change the overall conclusions of the assessments - resolved as per REP2-097.42. • Agreement between the JNCC and the Applicant on Likely Significant Effects on the North Anglesey Marine Special Area of Conservation due to underwater sound from piling and UXO clearance - resolved as per REP2-097.43. • Agreement between the JNCC and the Applicant on the appropriate use of EDRs to assess disturbance within the harbour porpoise SACs in the HRA Stage 2 ISAA - resolved as per REP2-097.44. • Acceptance by JNCC of the Applicant's confirmation that West Wales Marine SAC has been considered in line with the iterative approach for harbour porpoise and was missed in error from Table 1.78 - considered resolved as per REP2-097.45.

Reference	Question to	ExQ1	Applicant's response
			• JNCC's agreement in principle with the content of the Outline UWSMS (APP-202) and that the final UWSMS could be finalised post-consent - considered resolved as per REP2-097.48, REP2-097.49 and REP2-097.53. • JNCC's acknowledgement that the use of scare charges will be considered by the Applicant for the final MMMP and UWSMS in consultation with relevant stakeholders - considered resolved as per REP2-097.52, REP2-097.60. • JNCC's agreement with the inclusion of the MMMP in the Mitigation and Monitoring Schedule and of the Applicant's correction that the UWSMS was J16 (APP-202) referenced in this schedule - considered resolved as per REP2-097.54 and REP2-097.55. • JNCC's acknowledgement that submission of data to the Marine Noise Registry is secured in Schedule 14, condition 29 of the draft Draft DCO (RR-033.61) - considered resolved as per REP2-097.56. • Applicant's agreement on JNCC's advice regarding the outline MMMP with regards to the forthcoming UXO position paper, mitigation zone PAM and UXO clearance - resolved as per REP2-097.58, REP2-097.61, REP2-097.62, REP2-097.63. • JNCC's acknowledgement that the Applicant provided further clarification on baseline aerial survey coverage in Volume 6, Annex 4.1 Marine mammal technical report (APP-090), and the JNCC's agreement that no further action is needed (REP2-097.64).

2.17 Offshore Biodiversity, Ecology and Natural Environment – Offshore Ornithology

Table 2.17: Response to ExQ1: Offshore Ornithology Questions

Reference	Question to	ExQ1	Applicant's response
Q1.17.11	The Applicant	Can the Applicant summarise its approach to resolve NRW (A) concerns on its Offshore Ornithology Assessment of Pen y Gogarth / Great Orme's Head SSSI [REP1-037] received at Deadline 2 [REP2- 099].	The Applicant acknowledges the comments received at Deadline 2 from NRW (A) (REP2- 099) on the Offshore Ornithology Assessment of Pen y Gogarth / Great Orme's Head SSSI (REP1-037) submitted at Deadline 1 and has responded in detail in the Applicant's Responses to Natural Resources Wales D2 Submission (S_D3_6) at Deadline 3. The Applicant will submit a revised Assessment of Pen y Gogarth/Great Orme's Head SSSI at Deadline 4 to address NRW's comments. The Applicant will engage with NRW on the revised assessment ahead of the Issue-Specific Hearing 4 (Offshore Matters) on 23 October 2024 and Deadline 4.
Q1.17.12	The Applicant	Can the Applicant summarise its approach to resolve JNCC ornithology comments and concerns received at Deadline 2 [REP2-097] Note: The ExA is considering D2 submissions, responses to its R17 letter (dated 15th August 2024) and awaiting D3 submissions with further questions on marine ornithology likely to be raised during the Examination.	The Applicant acknowledges the comments from the JNCC received at Deadline 2 (REP2-097) and has provided detailed responses in the Applicant's Response to JNCC D2 Submission (S_D3_4) at Deadline 3. The Applicant considers that a number of matters have been resolved in the Applicant's Response to JNCC Submission (S_D3_4) at Deadline 3 (see rows REP2-097.5, REP2-097.8, REP2-097.10, REP2-097.12, REP2-097.13, REP2-097.17, REP2-097.18, REP2-097.19, REP2-097.21, REP2-097.23, REP2-097.24, REP2-097.25, REP2-097.28 in the Applicant's Response to JNCC D2 Submission (S_D3_4)). A key concern from the JNCC relates to the use of single displacement and mortality values for analysing population impacts at the EIA and HRA scale. The Applicant has submitted an Offshore Ornithology Supporting Information Technical Note (S_D3_19) at Deadline 3, which provides an assessment of apportioned displacement and collision impacts using a range-based approach for the Mona Offshore Wind Project alone and in-combination, in accordance with the JNCC's advice. In addition, the Offshore Ornithology Supporting Information Technical Note (S_D3_19)

Reference	Question to	ExQ1	Applicant's response
			brings together the key assessment information, with clear signposting to where this and further supporting details can be found within the application documents. The Applicant has engaged with the JNCC and NRW on the scope and presentation of the supporting information technical note to ensure this sufficiently addresses the SNCBs' concerns and the Examining Authority's Request for Further Information – Rule 17 (PD-012/PD-012a). Another key concern from the JNCC relates to discrepancies within the Environmental Statement and HRA application materials which have been highlighted in their relevant representations (RR-033 and responses to comments on the JNCC relevant representation (REP2-097)) and written representations (REP1-066/REP1-067). Appreciating the need for clarity in the application material, the Applicant submitted the following revised offshore ornithology application EIA and HRA material (as tracked and clean versions) at Deadline 2 to address the errata: • Volume 2, Chapter 5: Offshore Ornithology (REP2-016) • Volume 6, Annex 5.2: Offshore Ornithology Displacement Technical Report (REP2-018) • Volume 6, Annex 5.3: Offshore Ornithology Collision Risk Modelling Technical Report (REP2-020) • Volume 6, Annex 5.5: Offshore Ornithology Apportioning Technical Report (REP2-022) • Volume 6, Annex 5.6: Offshore Ornithology Population Viability Analysis Technical Report (REP2-024) • HRA Stage 1 Screening Report (REP2-012) • HRA Stage 2 Information to Support an Appropriate Assessment (ISAA) Part Three: Special Protection Areas (SPAs) and Ramsar Sites Assessments (REP2-010) • HRA Integrity Matrices (REP2-014). The Applicant has also submitted, alongside the revised application documents, a Schedule of Changes to the Offshore Ornithology EIA and HRA Documents (REP2-087). This document describes the changes

Reference	Question to	ExQ1	Applicant's response
			made to the offshore ornithology EIA and HRA application materials including a summary of the change, details of where the change has been made, the reason for the change and how it corresponds to the errata identified in the Errata Sheet (REP1-044) submitted at Deadline 1. The revisions to the offshore ornithology EIA and HRA application materials at Deadline 2 have not resulted in any change to the conclusion of the assessments. Several additional minor errata have been identified since submission of the updated application materials at Deadline 2 (kittiwake abundance errata in table 1.104 of Volume 2, Chapter 5: Offshore ornithology (REP2-016), common guillemot abundance errata in table 1.51 of Volume 2, Chapter 5: Offshore ornithology (REP2-016) and herring gull collisions for Erebus errata in table 5.122 and table 5.123 of Volume 2, Chapter 5: Offshore ornithology (REP2-016)). These have been recorded in the Errata Sheet (S_PD_1 F04) and an Offshore Ornithology Errata Clarification Note (S_D3_26) submitted at Deadline 3. None of the errata identified in the application materials alter the conclusions presented in Volume 2, Chapter 5: Offshore Ornithology (REP2-016) and the HRA Stage 2 Information to Support an Appropriate Assessment (ISAA) Part Three: Special Protection Areas (SPAs) and Ramsar Sites Assessments (REP2-010). The Applicant considers that the information provided at Deadlines 2 and 3 provides a sufficient understanding of the potential impacts on offshore ornithology to resolve the JNCC's outstanding concerns and allow the JNCC to confirm its position with respect to the Environmental Statement and HRA conclusions for the Mona Offshore Wind Project. The Applicant welcomes further questions from the Examining Authority once all parties have had the opportunity to review the offshore ornithology submissions at Deadline 3.
Q1.17.13	*JNCC, NRW(A)*	*Are you satisfied that the site specific digital aerial survey (DAS) reflects Manx shearwater baseline characterisation. If not, can you provide evidence to justify your position?*	The Applicant is progressing with a statement of common ground (SoCG) with NRW (A) and the JNCC. Initial SoCGs were submitted at Deadline 1 (see the Initial SoCG between Mona Offshore Wind Project and Natural Resources Wales Advisory (NRW(A)) – Offshore (REP1-025) and the

Reference	Question to	ExQ1	Applicant's response
			Initial SoCG between Mona Offshore Wind Project and the Joint Nature Conservation Committee (JNCC) (REP1-028). In the initial SoCG submitted at Deadline 1 (REP1-025), NRW (A) agreed with the broad approach to the Mona Offshore Wind Project site-specific digital aerial surveys (DAS) and agreed to the baseline characterisation for offshore ornithology (see items NRW.OO.4 and NRW.OO.7 in the Initial SoCG between Mona Offshore Wind Project and NRW(A) – Offshore (REP1-025)). Similarly, in the initial SoCG submitted at Deadline 1 (REP1-028), the JNCC agreed with the broad approach to the Mona Offshore Wind Project site-specific DAS and agreed to the baseline characterisation for offshore ornithology (see items JNCC.OO.4 and JNCC.OO.7 in the Initial SoCG between Mona Offshore Wind Project and the JNCC (REP1-028)). The Applicant therefore understands that NRW (A) and the JNCC are satisfied that the site specific DAS reflects Manx shearwater baseline characterisation. Because of the diel variations in the level of activity of Manx shearwater, the suitability of DAS to characterise Manx shearwater abundance has been raised by the Royal Society for the Protection of Birds (RSPB) (see row RR-071.7 in the Applicant's Response to Relevant Representations (PDA-008)). Manx shearwater are active at night as birds only attend their colonies during hours of darkness to avoid predation. Best practice survey techniques to characterise baseline employed DAS, which can only be carried out in good visibility for detection purposes and are therefore not appropriate to characterise abundance at night or around dawn or dusk when Manx shearwater are travelling to/from their colonies or foraging at sea. Digital aerial surveys are widely adopted across the offshore industry to characterise baseline. Therefore, any potential limitations of the survey technique with respect to characterising the baseline for Manx shearwater are not limited to the Mona Offshore Wind Project.

Reference	Question to	ExQ1	Applicant's response
			Neither the RSPB or NRW and the JNCC have raised concerns at pre-application (S42 response) on the suitability of DAS for Manx shearwater and the Applicant understands that NRW (A) and the JNCC are satisfied that the site specific DAS reflects Manx shearwater baseline characterisation.
Q1.17.15	The Applicant *RSPB Cymru*	Can you explain how the application considers the resilience of ecosystems and potential ornithology effects regarding: • displacement from foraging areas; • species energy expenditure; • impact on forage fish; and • ocean stratification (Irish sea) *Can RSPB Cymru provide evidence addressing the four bullet points to demonstrate that the assessment has not fully considered indirect ecosystem impacts and also whether it would change any conclusions related to significance of effects*	The Applicant has detailed below how the resilience of ecosystems and potential ornithology effects have been considered in the application. <u>Displacement from foraging areas</u> The Applicant has considered the effects of displacement using the range of parameters recommended by the statutory nature conservation bodies (SNCBs) (i.e. displacement and mortality rates) in Volume 6, Annex 5.2: Offshore Ornithology Displacement Technical Report (REP2-018). The increase in baseline mortality has been assessed at the EIA scale using the range of parameters recommended by SNCBs. At an HRA scale, the impact of displacement effect at an SPA (i.e. apportioned impact) has been assessed using a single point estimate based on a review of evidence of displacement and mortality rates. The Offshore Ornithology Supporting Information Technical Note (S_D3_19) submitted at Deadline 3 has also presented the apportioned impact of displacement to SPAs (i.e. HRA scale) using the range of parameters (mortality and displacement rates) recommended by the SNCBs. The results of the assessments have concluded no significant effect on receptors (Volume 2, Chapter 5: Offshore ornithology (REP2-016)) and no adverse effect on integrity (AEoI) of the SPAs/Ramsar sites (Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (REP2-010) for both the project alone and the cumulative/in-combination effects. Furthermore, the Applicant intends to submit a revised Assessment of Pen y Gogarth/Great Orme's Head SSSI at Deadline 4 using the range of parameters (mortality and displacement rates) recommended by the SNCBs. <u>Species energy expenditure</u> Species energy expenditure for ornithological receptors can be impacted by displacement and barrier effects. Barrier effects refer to the deflection of

Reference	Question to	ExQ1	Applicant's response
			flight paths in response to the wind farms, which may lead to increased energy expenditures. Displacement refers to the reduced density of species in the wind farm area (plus buffer) compared to the pre-construction densities. The impacts of displacement and barrier effects manifest themselves in terms of impacts on daily time and energy budgets, that ultimately may reduce the demographic fitness i.e. survival rates and breeding productivity. There is currently no standard approach adopted by the offshore wind industry to measure and quantify the effect of displacement or barrier effect on species energy expenditure. To the Applicant's knowledge, there is also no standard guidance recommended by SNCBs to directly assess effects on species energy expenditure. Displacement assessments undertaken for the purpose of Environmental Impact Assessments (EIA) and Habitats Regulations Assessments (HRA) are based on predictions of additional mortality from displacement and assumes that a proportion of the population using the site will die as the result of displacement. Energy expenditure underpins this assumption as birds unable to meet their energy requirements are expected to die. Species energy expenditure may also increase as the result of barrier effect. The assessment of disturbance and displacement at offshore wind farms includes an element of barrier effect impact (NatureScot, 2023). The displacement assessment for the Mona Offshore Wind Project has concluded no significant effect at EIA scale on receptors from the project alone or cumulatively (Volume 2, Chapter 5: Offshore ornithology (REP2-016)). The assessment of disturbance and displacement is also considered in HRA Stage 1 Screening Report (REP2-012) and the HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (REP2-010), which concluded of no AEoI from the Mona Offshore Wind Project alone and in-combination with other plans and projects.

Reference	Question to	ExQ1	Applicant's response
			In the absence of empirical data on the barrier effects on migratory birds and the absence of a standard robust approach to assess the effect at the population level, the impact of barrier effect is assessed qualitatively in the Environmental Statement Volume 2, Chapter 5: Offshore ornithology (REP2-016) and the specific impact of barrier to movement is screened out for all sites in the HRA Stage 1 Screening Report (REP2-012). <u>Impact on forage fish</u> The potential effects on fish species and their habitats have been assessed in full in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (APP-055). Section 5.7 of Volume 2, Chapter 5: Offshore ornithology (REP2-016) assesses the potential effects on seabirds in the context of how seabird prey species may be impacted through underwater sound and temporary habitat loss/disturbance and increased suspended sediment. The assessment has concluded the effect to be of minor adverse significance (which is not significant in EIA terms) for temporary habitat loss/disturbance and increased suspended sediment concentrations (SSCs). The assessment concluded the effect to be of minor adverse effect for indirect impacts from underwater sound affecting prey species. Furthermore, the assessment presented in HRA Stage 1 Screening Report (REP2-012) and the HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (REP2-010) concluded of no AEoI. <u>Ocean stratification (Irish sea)</u> Impacts to temperature and salinity stratification due to the presence of Infrastructure was assessed in Volume 2, Chapter 1: Physical Processes (APP-053). The modelling studies undertaken for the Mona Offshore Wind Project detailed in Volume 6, Annex 1.1: Physical processes technical report of the Environmental Statement (APP-086) demonstrated that potential changes in tidal currents and wave climate do not extend into areas located beyond the physical processes study area (Figure 1.2 Volume 2, Chapter 1: Physical Processes (APP-053)), therefore there will be no impact on water density and thermal stratification in the east Irish Sea. Due to the physical processes assessment concluded no impact on ocean stratification, there is no pathway for indirect effects to ornithology

Reference	Question to	ExQ1	Applicant's response
			and thus, no need to assess this impact pathway within the ornithological assessment in the Environmental Statement and HRA. The Applicant acknowledges that there are currently initiatives such as the Ecological Consequences of Offshore Wind research programme (ECOWind) in progress to improve understanding of ecosystem resilience to the development of offshore wind. For example, the Applicant is a partner of the ECOWind-ACCELERATE project in the east Irish Sea (other members include NRW, JNCC and RSPB) which is examining the ecological implications of accelerated seabed mobility around windfarms. Whilst it is acknowledged these types projects are in progress, the Applicant considers that the assessments have been undertaken in line with current SNCB guidance and industry best practices.
Q1.17.16	The Applicant	The latest status assessment of breeding seabird species in the United Kingdom was published on the 2 September 2024 with the Arctic Tern, Leach's Storm-petrel, Common Gull, Great Black-backed Gull and Great Skua added to the UK Red list. Can the Applicant advise if this affects its ES/HRA?	The Applicant notes that in September 2024, Arctic tern, Leach's storm-petrel, Common gull, Great black-backed gull and Great skua were added to the UK Red list. This was a raise from amber status. The latest review was published in December 2021, as Birds of Conservation Concern 5 (BoCC5). An addendum to the status of seabirds was released in September 2024 (Stanbury *et al*., 2024). The offshore ornithology Important Ecological Features (IEFs) in Volume 2, Chapter 5: Offshore ornithology (REP2-016) have been selected based on the conservation status of ornithological receptors, their sensitivity to impact and their known abundance from site-specific surveys and desktop studies. The conservation status is based on whether the species are listed on Annex I of the European Commission ('EC') Directive 2009/147/EC (codified version of 79/409/EC) on the Conservation of Wild Birds (the 'Birds Directive') and the level of conservation concern presented from the Birds of Conservation Concern 5 (BoCC5) (Stanbury *et al*., 2021), which uses quantitative assessments against standardised criteria to allocate species to red, amber, or green lists depending on their level of conservation concern.

Reference	Question to	ExQ1	Applicant's response
			The Applicant can confirm that great black-backed gull was taken forward for assessment as an IEF despite being Amber listed in BoCC5 at the time of the application. Therefore, the change in status does not impact the conclusion of the species' sensitivity in the assessment. The sensitivity of the receptor was considered to be medium for collision risk in Volume 2, Chapter 5: Offshore ornithology (REP2-016). The change of the Birds of Conservation Concern 5 status does not alter assessments provided in the HRA Stage 1 Screening Report (REP2-012) and the HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (REP2-010). Although Arctic tern, Leach's storm-petrel, common gull and great skua were recorded in very low numbers or very infrequently during the site-specific surveys and the desktop study, the species were taken forward to assessment as an IEF despite being Amber listed at the time of the application. Therefore, the change in status does not impact the conclusion of the sensitivity in the assessment for these species and, therefore, does not impact the overall conclusions of the assessments. The sensitivity of these receptors was considered to be medium for collision risk in Volume 2, Chapter 5: Offshore ornithology (REP2-016). The change of the Birds of Conservation Concern 5 status does not alter assessments provided in the HRA Stage 1 Screening Report (REP2-012) and the HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (REP2-010)

2.18 Onshore Biodiversity, Ecology and Natural Environment

Table 2.18: Response to ExQ1: Onshore Biodiversity, Ecology and Natural Environment

Reference	Question to	ExQ1	Applicant's response
Q1.18.1	The Applicant	**OLEMP [REP2-034]** Paragraphs 1.6.1.3-1.6.1.12 identify technical roles and secondary management approach associated with the construction stage. Can the Applicant advise what the management approach and technical roles would be for the onsite preparation stage.	The Applicant confirms that all of the roles set out in Section 1.6.1 of the Outline LEMP (REP2-034) will be equally applicable to the onshore site preparation works; the roles and responsibilities apply to all requirements set out in the Outline LEMP (REP2-034), which includes the onshore site preparation stage.
Q1.18.2	The Applicant	**OLEMP [REP2-034]** The design principles for biodiversity enhancement refers to management and enhancement of the nature conservation value of the Mona Onshore Development Area. Can you summarise what criteria was used to show that new woodland, ponds, grassland and hedgerow enhances the nature conservation area. For example, were any specific ratios used to show that habitats have been enhanced and have any of these ratios been agreed with DCC, CCBC, and NRW(A)?	The proposed new areas of woodland, ponds, grassland and hedgerow set out in the Outline LEMP (REP-034) are considered proportionate to the impacts of the Mona Offshore Wind Project, and take into account local site conditions and the requirements for various protected species present in the local area, which would benefit from biodiversity enhancement measures (e.g. reptiles, amphibians). The quantum of enhancement measures for the Mona Offshore Wind Project is qualitatively rather than quantitatively derived but has been designed in consultation with key stakeholders through the Onshore Ecology Expert Working Group including DCC, CCBC and NRW(A).
Q1.18.3	The Applicant	**OLEMP [REP2-034]** Can you advise how permanent habitat loss compensated with new planting (using suitable native species) to provide new habitat with at least equal ecological value would enhance the nature conservation value of the Proposed Development area?	The Outline LEMP (REP2-049) is based on a number of landscape and ecological principles including the creation of new habitats with planting of suitable native species to mitigate the permanent habitat loss. Together these principles guide the ecological and landscape mitigation and enhancement measures which are to be delivered within the Proposed Development area. In its response at the Procedural Deadline (see point RR-011.82 in PDA-008), the Applicant explained that the new planting and habitats (primarily at the Onshore Substation) provide both mitigation and enhancement (see the summary of the mitigation and biodiversity benefit was provided in PDA-019). For example, where hedgerow is permanently lost at the onshore substation site, new hedgerow will be planted (see response to Q1.18.22).

Reference	Question to	ExQ1	Applicant's response
			That new hedgerow planting will be of at least equal ecological value and the volume of planting will outweigh the total volume of hedgerow lost, creating an enhancement overall. The Applicant advises that the nature conservation value of the Proposed Development area will be enhanced by providing planting that creates new and/or enhances existing green corridors between habitats, thereby increasing the overall connectivity between habitats and the resilience of these habitats. The Outline LEMP (REP2-049) proposes a wider variety of new habitats that are currently present at the Onshore Substation (e.g. wildflower meadow) and the number of trees that will be replanted exceeds the guidance replacement ration of 1:3.
Q1.18.4	The Applicant	**OLEMP [REP2-034]** Can the Applicant provide a table listing all Habitats of Principal Importance that would be lost, permanently and temporarily, alongside the total area of proposed mitigation for each?	A table listing Habitats of Principal Importance, the areas to be permanently lost, temporarily lost and areas of mitigation has been provided in Appendix 25.10 (S_D3_25.10). The total area of proposed habitat mitigation and enhancement measures have mostly been developed qualitatively in accordance with best practice guidance and professional judgement, in consultation with key stakeholders. However, mitigation for Great Crested Newts (GCN) has been quantitatively developed because the quantum of mitigation habitat (in terms of both terrestrial and aquatic habitats) delivery is a key component of the European Protected Species Management licence process, to demonstrate that the GCN population can be maintained at 'favourable conservation status'; these calculations are presented in Table 1.5 (aquatic habitats) and Table 1.6 (terrestrial habitats) in Appendix D of the OLEMP (REP2-034).
Q1.18.5	The Applicant	**OLEMP [REP2-034]** Can you advise how measures shown on plots 15 & 16 on the illustrative landscape and ecology strategy plan Figure 1.4 would affect the St Asaph Solar Farm shown on Figure 4.2 in Chapter 4: Onshore and intertidal ornithology [APP-067]	The Applicant notes that a planning application for St Asaph Solar Farm has not been submitted to Denbighshire County Council, therefore it is not possible for the Applicant to comment on the proposed use of these parcels by St Asaph Solar Farm. Plots 15 and 16 (as shown on Figure 1.4 of the Outline LEMP (REP2-034)) will only be required by the Mona Offshore Wind Project on a temporary basis, to be used as a receptor site for translocated GCN and other amphibians and reptiles during the construction of the Onshore Substation. The Mona Offshore Wind Project will not rely on the

Reference	Question to	ExQ1	Applicant's response
			long term use of these parcels to deliver permanent mitigation or biodiversity benefit.
Q1.18.6	The Applicant	**Onshore - OLEMP [REP2-034]** Paragraph 1.8.1.4 relates to commitments relevant to woodland within the Proposed Development area. Can you confirm: 1. when would planting be undertaken and whether this would be prior to habitat loss and, if not why not; 2. the ancient semi-natural woodlands identified for expansion and whether adjacent land would require measure to address soil fertility and weed control; 3. whether areas of woodland including ancient semi-natural woodlands would require an extended monitoring and maintenance period to reflect natural regeneration and whether any measures are required during the decommissioning phase; and 4. if any assessment has been undertaken on nurseries suppliers and their capacity to provide locally sourced seed and plants.	1. Woodland planting would be undertaken upon completion of construction. Given the length of time required for tree planting to establish and mature, it is not possible for this habitat to be 'created' prior to woodland removal. The assessment for woodland habitat loss presented in paragraphs 3.9.2.30 – 3.9.2.34 of Volume 3, Chapter 3: Onshore Ecology [APP-066] has taken into account the timeframe for successful establishment of replacement planting when considering the magnitude of the impact. 2. The reference to expanding an area of Ancient Semi-natural Woodland refers to parcel 13 (as shown on Figure 1.4 of the Outline LEMP (REP2-034)) which will be planted with woodland species to connect the areas of Ancient Semi-natural Woodland to the north, east and west. The post-planting maintenance requirements (committed to within the Outline LEMP ((REP2-034)) suitably secure any activities that would be necessary for the successful establishment of newly planted trees; this would include measures to address soil fertility and weed control as necessary (see paragraphs 1.8.2.3 – 1.8.2.6). 3. The Applicant notes that the updated Outline LEMP submitted at Deadline 2 (REP2-034) states that the timescales for long term habitat monitoring and management, would be agreed as appropriate with NRW as part of the final LEMP to be produced post-consent. The monitoring and maintenance/management requirements will be different for different habitats. (e.g. ancient semi-natural woodland). Requirement 21 of the draft development consent order (Document Reference REP2-004) states that the undertaker must submit a written scheme of decommissioning to the relevant planning authority at least 6 months prior to decommissioning works commencing. This is the mechanism through which any specific measures for decommissioning will be agreed as appropriate at the time of decommissioning. 4. The Applicant notes that paragraph 1.8.3.4 of the Outline LEMP (REP2-034) states that "*the use of direct seeding of locally native tree seed and planting of trees grown from local seed will be*

Reference	Question to	ExQ1	Applicant's response
			considered". The Applicant is aware of local nurseries that supply locally sourced seed. Discussions with the local nurseries will be undertaken during detailed design.
Q1.18.7	The Applicant	**OLEMP [REP2-034]** Paragraph 1.8.1.5 relates to commitments relevant to each habitat. Can you confirm: 1. your approach to temporary gaps between hedgerows during site preparation, and during construction; 2. where land is to be returned to landowner, how good ground cover (suitable as foraging habitat for GCN and reptiles) would be secured; and 3. where land is to be returned to the landowner, how would a reduced grazing regime (to create a longer more tussocky sward) be secured.	1. The Applicant can confirm that temporary gaps will be created in hedgerows to accommodate the construction of the onshore cable corridor. Replacement planting will be undertaken on completion of construction. The assessment of impacts has been undertaken on this basis as it represents the maximum design scenario. 2. Where land is to be returned to the landowner, the Applicant's ability to maintain good ground cover and foraging habitat for GCN is secured through the placing of a restrictive covenant on the relevant plot(s) through the power to acquire rights in land as provided for in the draft development consent order (Document Reference REP2-004) (Draft DCO). The restrictive covenants are set out in Schedule 8 of the Draft DCO, and the relevant rights package is Landscaping and ecological mitigation (plots 11-191, 11-192 and 11-214), which states *"A restrictive covenant over the land for the benefit of the remainder of the Order land to prevent any activity which would in the reasonable opinion of the undertaker result in the disturbance of landscaping or ecological mitigation measures or works or areas of habitat creation including any ploughing or grazing, during the period within which the undertaker is bound by any consent or licence to maintain that ecological mitigation measures or works or areas of habitat creation, without the prior written consent of the undertaker".* 3. A reduced grazing regime would be secured through a restrictive covenant on the relevant plot(s), as set in 2) above.
Q1.18.9	The Applicant	**OLEMP [REP2-034]** Can the Applicant describe its approach to immediate alternative roost sites where it is not practicable to install long-lasting woodcrete bat boxes and whether this approach would be prior to site preparation instead of prior to construction?	Pre-construction surveys will identify any trees containing bat roosts that will require a European Protected Species Mitigation licence from NRW and provision of roost replacement(s) prior to removal. Removal of trees containing bat roosts, and provision of replacement roosts, could take place in either the onshore site preparation works or construction phase, depending on the location of the tree(s) to be removed. As would be

Reference	Question to	ExQ1	Applicant's response
			necessary under the conditions of the European Protected Species Mitigation licence, roost replacements will be put in place prior to the removal of the tree containing the roost. Although it is considered very unlikely that it would not be practicable to install woodcrete bat boxes as mitigation, the requirement for mitigation will be driven by the European Protected Species Management licence process administered by NRW and will be in line with the approach currently proposed within the Outline LEMP (REP2-034) would be approved by NRW in order for an European Protected Species Management licence to be granted.
Q1.18.10	The Applicant	**OLEMP [REP2-034]** For new planted areas of habitats the OLEMP refers to a maintenance period of five years. Can the Applicant confirm if the five years is a rolling period i.e. if a new planted area fails in year four, would this in effect be year one, with a further five years maintenance period to follow?	The Applicant can confirm that the five-year maintenance period is a rolling period that will be restarted where replacement planting is provided within the maintenance period. This clarification will be added to the Outline LEMP [REP2-034].
Q1.18.11	The Applicant	**OLEMP [REP2-034]** Can the Applicant provide further evidence to justify why it does not consider it necessary for a longer period than five years of maintenance for planted woodland area?	The Applicant notes its response to REP1-049.22 (REP2-085) which sets out its justification for why a five-year maintenance period for planted woodland is appropriate for the Mona Offshore Wind Project. The proposed duration of the maintenance period is in line with other recently consented major projects in the local area so has recently been considered sufficient in very similar circumstances. The Applicant notes that the five-year maintenance period is a rolling period, therefore, the maintenance period may exceed five-years in specific circumstances (see response to Q1.18.11).
Q1.18.12	The Applicant	**OLEMP [REP2-034]** The OLEMP refers to appropriate use of artificial lighting. Can you explain where and how the potential impacts of artificial light sources during site preparation and	A separate assessment for onshore site preparation activities was not undertaken in the Ecological Impact Assessment because these activities were considered within the scope of construction impacts. The Outline LEMP (REP2-034) refers to some preliminary construction activities that are to be undertaken in advance of the main construction period as 'onshore site preparation works'.

Reference	Question to	ExQ1	Applicant's response
		construction, operations, and decommissioning were considered for otters and badgers?	The effect of lighting disturbance to badgers was not scoped into the Ecological Impact Assessment; the scope of the assessment was developed in consultation with relevant statutory and non-statutory consultees (including NRW, DCC, CCBC, and the Welsh Government) and it is reasonable to assume that this species as a common and widespread mammal would not be significantly impacted by lighting during onshore site preparation and construction, operations and decommissioning. The effect of artificial lighting on otter during construction is assessed alongside other construction activities (human noise and movement activities and increased artificial lighting) in paragraphs 3.9.3.99 – 3.9.3.107 (of Volume 3, Chapter 3: Onshore Ecology (APP-066)) and is concluded to be minor adverse and not significant. The assessment of decommissioning activities would be similar in duration and magnitude to construction activities. The effect of artificial lighting on otter during operation is not assessed because there will be no operational lighting to watercourses that may support otter.
Q1.18.13	The Applicant	**Chapter 3 (Vol 3) Onshore ecology [APP-066]** Table 3.22 states that the project has been designed to avoid areas of ancient woodland. Measures would be put in place to ensure that a minimum 15 m buffer is retained between ancient woodland and construction areas. However, the justification column states it would limit disturbance activity at the ancient woodland edges. Can the Applicant clarify if the measures to be put in place would avoid disturbance, or limit disturbance, at ancient woodland edges.	The Applicant confirms that it has committed to implementing a 15m buffer from construction activities to areas of ancient woodland. The buffer is in accordance with UK Government guidance (Ancient woodland, ancient trees and veteran trees: advice for making planning decisions) to avoid direct impacts to roots and to limit disturbance to the ancient woodland edges.
Q1.18.14	The Applicant	**Chapter 3 (Vol 3) Onshore ecology [APP-066]** Table 3.23: IEFs taken forward into the assessment lists ancient woodland having a national value. Table 3.17: Summary of Important Ecological Features lists ancient	The Applicant confirms that ancient woodland has a national value. The value stated in Table 3.17 of Volume 3, Chapter 3: Onshore Ecology (APP-066) is incorrect and should read 'national' value rather than 'district' value. This correction has been added to the errata sheet (S_PD_1 F04).

Reference	Question to	ExQ1	Applicant's response
		woodland having a county value. Can the Applicant explain the reason for the two different values?	The Applicant can confirm that the ecological impact assessment assumes ancient woodland has national value (and a high sensitivity) and therefore, the amendment to Table 3.17 does not affect the assessment conclusion.
Q1.18.15	The Applicant	**Chapter 3 (Vol 3) Onshore ecology [APP-066]** Table 3.23: IEFs taken forward into the assessment lists hedgerow having a county value. Table 3.17: Summary of Important Ecological Features lists hedgerow having a national value. Can the Applicant explain the reason for the two different values?	The Applicant confirms that hedgerows have a county value. The value stated in Table 3.17 of Volume 3, Chapter 3: Onshore Ecology (APP-066) is incorrect and should read 'county' value rather than 'national' value. This correction has been added to the errata sheet (S_PD_1 F04). The Applicant can confirm that the ecological impact assessment assumes hedgerows have a county value (and a high sensitivity) (see paragraph 3.9.2.47 of APP-066) and therefore, the amendment to Table 3.17 does not affect the assessment conclusion.
Q1.18.16	The Applicant	**Chapter 3 (Vol 3) Onshore ecology [APP-066]** Table 3.23: IEFs taken forward into the assessment lists Great Crested Newts having a national value. Table 3.17: Summary of Important Ecological Features lists Great Crested Newts having a county value. Can the Applicant explain the reason for the two different values?	The Applicant confirms that great crested newt has a county value. The value stated in Table 3.23 of Volume 3, Chapter 3: Onshore Ecology (APP-066) is incorrect and should read 'county' value rather than 'national' value. This correction has been added to the errata sheet (S_PD_1 F04). The Applicant can confirm that the ecological impact assessment assumes great crested newt has county value (and a medium sensitivity) (see paragraph 3.9.3.91 APP-066) and therefore, the amendment to Table 3.23 does not affect the assessment conclusion. The assessment of significance takes into consideration the conservation importance of the population and the ability to recover from the impact.
Q1.18.17	The Applicant	**Chapter 3 (Vol 3) Onshore ecology [APP-066]** Table 3.23: IEFs taken forward into the assessment lists Terrestrial invertebrates as having a district value. Table 3.17: Summary of Important Ecological Features lists Terrestrial invertebrates having a local value. Can the Applicant explain the reason for the two different values?	The Applicant confirms that terrestrial invertebrates have a county value. The value stated in Table 3.17 of Volume 3, Chapter 3: Onshore Ecology (APP-066) is incorrect and should read 'county' value rather than 'local' value. This correction has been added to the errata sheet (S_PD_1 F04). Table 3.23 incorrectly refers to 'district' value and should read 'county' value. This correction has also been added to the errata sheet (S_PD_1 F04).

Reference	Question to	ExQ1	Applicant's response
			The Applicant can confirm that the ecological impact assessment assumes terrestrial invertebrates have a county value (and a medium sensitivity) (see paragraph 3.9.3.123 APP-066) and therefore, the amendments to Table 3.17 and Table 3.23 do not affect the assessment conclusion.
Q1.18.18	The Applicant	**Chapter 3 (Vol 3) Onshore ecology [APP-066]** Paragraph 3.6.2.9 lists geographical scales but does not refer to district. Can you advise on the value of district?	The Applicant notes that all the equivalent District value sites are assigned a medium sensitivity, which equates to County value in Table 3.19 of Volume 3, Chapter 3: Onshore Ecology (APP-066).
Q1.18.19	The Applicant	**Chapter 3 (Vol 3) Onshore ecology [APP-066]** Can the Applicant advise how it has considered the effects of Non-Road Mobile Machinery (NRMM) Emissions on ecological receptors for project alone and cumulative with other projects?	Non-Road Mobile Machinery (NRMM) refers to mobile machines, transportable industrial equipment or vehicles which are fitted with an internal combustion engine and not intended for transporting goods or passengers on roads. Where NRMM is employed, the pollutants of concern for local air quality are NO2 and particulate matter (i.e. PM10 and PM2.5). Defra's Local Air Quality Management Technical Guidance: LAQM.TG22 states that "*experience of assessing the exhaust emissions from on-site plant (NRMM) and site traffic suggests that, with suitable controls and site management, they are unlikely to make a significant impact on local air quality. In the vast majority of cases they will not need to be quantitatively assessed …*" On the basis of the guidance above and taking into account the operating machinery and travel measures set out in the Outline Dust Management Plan (REP2-042) NRMM emissions on local air quality are likely to be 'insignificant' and were screened out a detailed assessment in Volume 3, Chapter 10: Air Quality (APP-073). NRW have confirmed they agreed with the scope of the air quality assessment in section 1.4.7 of their Statement of Common Ground (REP1-026).
Q1.18.20	The Applicant	**Chapter 3 (Vol 3) Onshore ecology [APP-066]** Table 3.9 stated the impact of temporary and permanent habitat loss on protected habitats and species during operations and maintenance of the Mona Offshore Wind	1. The impact of permanent habitat loss on ecology receptors at the Onshore Substation is scoped into the assessment as a construction impact, since the impact will occur during the construction phase. Longer-term impacts in respect of habitat fragmentation (to species sensitive to the effects of habitat fragmentation) resulting from the permanent access road to the Onshore Substation are considered for

Reference	Question to	ExQ1	Applicant's response
		Project has been scoped out. This was agreed in the Planning Inspectorate's Scoping Opinion. The Design Principles [APP-189] identifies total permanent land requirement for the Mona Onshore Substation to the perimeter fence as 65,000 m2. For the onshore substation site and during operation, can the Applicant summarise: 1. the effects this permanent land loss would have on biodiversity, wildlife corridors and fragmentation; 2. what measures have been incorporated to conserve and enhance biodiversity; and 3. how the resilience of ecosystems would be in a better state at the onshore substation location.	the following receptors (references provided to relevant paragraphs in Volume 3, Chapter 3: Onshore Ecology (APP-066)): – Coed Cord LWS and Coed y Season LWS (paragraphs 3.9.4.24 – 3.9.4.31) – minor adverse effect (not significant) – broadleaved trees (parkland) and scattered trees (paragraphs 3.9.4.32 – 3.9.4.37) - minor adverse effect (not significant) – semi-natural and plantation woodland (paragraphs 3.9.4.38 – 3.9.4.43) - minor adverse effect (not significant) – bats (paragraphs 3.9.4.63 – 3.9.4.66) - minor adverse effect (not significant) – badgers (paragraphs 3.9.4.67 – 3.9.4.72) - minor adverse effect (not significant) – great crested newts (paragraphs 3.9.4.80 – 3.9.4.85) - minor adverse effect (not significant) – reptiles (paragraphs 3.9.4.104 – 3.9.4.109) - minor adverse effect (not significant) 2. Biodiversity conservation and enhancement measures at the Onshore Substation are set out in the Outline LEMP (REP2-034). The delivery, creation and long-term maintenance and management of these habitats is secured through the final LEMP which will be approved through the discharge of Requirement 12 of the draft development consent order (Document Reference C1 05). 3. The majority of the habitats to be directly impacted at the onshore substation are of low ecological value, comprising improved grassland and species-poor hedgerows. The habitat enhancement measures proposed have been designed to increase the species-diversity of hedgerows and grassland, to increase the value of the habitats for protected species (including bats, terrestrial invertebrates, breeding birds, reptiles and amphibians) and to improve ecosystem connectivity at a landscape scale. This will provide more opportunities for species to migrate and disperse throughout the landscape so that they are resilient to changing localised environmental conditions. The woodland block (block 11) at the onshore substation that will be directly impacted by the permanent access road is in significant decline due to extensive infection of specimens with ash die-back. The enhancement proposals to improve the woodland include the selective

Reference	Question to	ExQ1	Applicant's response
			clearance of infected ash trees and removal of the ash seedbank, which, along with the areas of new woodland planting, will encourage the establishment of resilient and healthy trees. Any longer-term monitoring and management agreed on a case by case basis through the LEMP would enable habitats that are recorded to be declining in biodiversity value over this period to be subject to remedial action to improve their habitat condition. For example, ponds that are becoming overgrown with invasive plants or encroached with scrub will be subject to specific management interventions (see paragraph 1.9.6.1 of the Outline LEMP (REP2-034)). This approach will enhance ecosystem resilience by taking into account the changing environmental conditions to support the structure and function of habitats and thus their value to protected species.
Q1.18.22	The Applicant	**Animal Health** Further to your response to the LIR ([REP2-085], REP1-049.48), can the Applicant explain how the sensitivity of the receptor parameter [in APP-078] can be applied to animal health.	Potential effects of heat from the operation of the Mona Offshore Wind Project on human health receptors was scoped out of the Environmental Statement (as stated in the Scoping Opinion Response (APP-194). This was on the basis that no significant effects were predicted to occur. Human receptors are considered to have a higher sensitivity compared to animals. On this basis, if there is no potential for significant effects on human health, then it is reasonable to conclude there would be similarly no potential for significant effects on animal health, assuming the worst-case scenario where animals are as sensitive to the potential impact as humans. This is in the absence of any scientific evidence to suggest that animals are more sensitive to this potential impact. With regards to potential effects from Electromagnetic Fields (EMF), Volume 4, Chapter 4 (APP-078) only assesses the 'perception of risk for EMF (radiation)' rather than identifying this as an actual potential impact.
Q1.18.23	The Applicant	**Trees, Woodlands and Hedgerows** Can the Applicant provide a table listing habitats such as trees, ancient trees, veteran trees, woodlands, and hedgerows, and indicate total quantities related to length/number/area for temporary loss, permanent loss, replacement and enhancement.	**Trees** As outlined in paragraphs 3.9.2.26 of the Volume 3, Chapter 3: Onshore Ecology (APP-066) the worst-case scenario for impacts to trees has been assessed as a total loss of 56 trees, 10 along the onshore cable corridor and 46 at the onshore substation.

Reference	Question to	ExQ1	Applicant's response
			While it will not be possible to replant the trees in the same location, replacement trees will be provided within the areas identified for woodland creation in the Outline LEMP (REP2-034). The Illustrative Landscape and Ecology Strategy Plan (Figure 1.4 in the Outline LEMP (REP2-034)) shows approximately 60,600 m^2 of woodland creation. If planted using the example planting regime quoted in paragraph 3.9.1.8 of the Design Principles (REP2-026) of one tree per m^2 this would result in the planting of 60,600 trees. This would mitigate for the loss of 56 trees at a ratio of 3:1 as recommended by The Woodland Trust (The Woodland Trust, 2021) as well as providing landscape screening and ecological mitigation as set out in Appendix F. Landscape and ecological land requirements of the Outline LEMP (REP2-034). The number and location of trees to be lost will be reviewed as part of the detailed design process and the Applicant is committed to providing a detailed Arboricultural Method Statement, which is secured within Requirement 9 of the draft development consent order (Document Reference REP2-004) as part of the discharge of the code of construction practice, in which tree losses will be quantified. <u>Ancient trees</u> The applicant can confirm no ancient trees will be removed. <u>Veteran trees</u> The applicant can confirm no veteran trees will be removed. **Woodland** A section of woodland (labelled W2 on the tree survey plans (S_D3_17.5) and parcel 11 on Figure 2.4 of the Outline LEMP REP2-034)) will need to be removed to facilitate the access road to the onshore substation. Many of the ash trees within this woodland are in a significant stage of decline due to ash die back disease. The Outline LEMP identifies that a wider section of the woodland than is required for the access road will be selectively cleared to remove trees affected by ash dieback disease and the woodland allowed to naturally regenerate around the permanent access road. No other areas of woodland will be removed.

<table>
<tr><th>Reference</th><th>Question to</th><th>ExQ1</th><th>Applicant’s response</th></tr>
<tr><td></td><td></td><td></td><td>Hedgerows
As outlined in paragraphs 3.9.2.39 to 3.9.2.45 of the Volume 3, Chapter 3: Onshore Ecology (APP-066) the worst-case scenario for impacts to hedgerows will be as follows:
<table><tr><th>Hedgerows temporarily lost (and replanted post construction) (m)</th><th>Hedgerows permanently lost (m)</th><th>Hedgerows created or enhanced (m)</th></tr><tr><td>7000</td><td>550</td><td>2500</td></tr></table>
This will be refined as part of the detailed design process, and it is likely that with design refinements and the implementation of trenchless crossing techniques for some additional hedgerows (which have been assumed within the assessment to be open-cut crossings), that this number of temporarily and permanently lost hedgerows will be reduced.</td></tr>
<tr><td>Q1.18.24</td><td>The Applicant</td><td>Applicant’s response to LIR
In your response to REP1-049.110 [REP2-085] you confirmed that you had commissioned an outline feasibility report which has assessed the suitability of trenchless techniques for the drill below Gwrych Castle Wood. Can the Applicant advise if this report would be submitted into the Examination at Deadline 3, and if not, explain why.</td><td>The Applicant appointed Stocktons Drilling Ltd to complete a Feasibility Assessment for trenchless technique methods to be used for the Landfall and the Gwrych Castle Wood crossings. Stocktons Drilling Ltd is a highly experienced and reputable contractor operating worldwide in all areas of Horizontal Directions Drilling and pipeline installation. Stockton subsequently appointed Waterman Infrastructure and Environment Ltd. as their design consultant.

The Applicant will not be submitting the Pensarn Landfall and Gwrych Wood Crossing(s) Trenchless Feasibility Report into the examination as it contains parameters and project design elements that have subsequently been disregarded and it would not be appropriate to share these as it would lead to confusion when comparing against the maximum design scenario outlined in the Project Description (APP-050).

The conclusions of the report gives confidence to the Applicant that a trenchless crossing of Gwrych Castle Wood is feasible from an engineering perspective and therefore the Applicant has committed to this trenchless crossing through the Onshore Crossing Schedule (REP1-007). The</td></tr>
</table>

Reference	Question to	ExQ1	Applicant's response
			Applicant acknowledges that if a trenchless crossing beneath Gwrych Castle Wood is not possible there is no alternative option and therefore the onshore cable could not be installed in this area and the consent would be unimplementable – this reflects the Applicants confidence in the feasibility of using a trenchless crossing technique for crossing Gwrych Castle Wood. Including complex crossings which can only be achieved through trenchless techniques is common practice for Nationally Significant Infrastructure Projects and similar crossings have been included for a number of development consent orders for similar cross country cable projects.
Q1.18.25	The Applicant	**Applicant's response to Welsh Government** In your response to Welsh Government's Written Representation reference REP1-052.14 [REP2-079] you state that every effort has been made to minimise the loss of veteran trees. However, paragraph 3.9.2.26 magnitude of impact, Chapter 3 (Vol 3) Onshore ecology [APP-066] states "…no veteran trees will be lost….". Can you please clarify whether the Proposed Development would result in the loss of any veteran trees.	The Applicant can confirm that the Mona Offshore Wind Project will not result in the loss of any veteran trees. (see the Tree Survey Clarifications Note (S_D3_17).

2.19 Other Offshore Infrastructure and Activities

Table 2.19: Response to ExQ1: Other Offshore Infrastructure and Activities Questions

Reference	Question to	ExQ1	Applicant's response
Q1.19.1	The Applicant	**Potential wake effects** The ExA notes the Applicant's rationale for scoping out wake effects from its assessment of effects on other sea users [APP-062] [PDA-008] [REP2-078]. However, the Ørsted IPs [REP1-072] [REP2-104] maintain that the Applicant should undertake an assessment of the effects of the Proposed Development on the energy yields of other developments in the East Irish Sea, and if required provide suitable mitigation. This is a matter also raised by Scottish Power Renewables (WODS) Ltd (SPR WODS) [RR-074]. Table 10.10 of [APP-062] indicates that all of the operational projects represented by the Ørsted IPs and SPR WODS are over 30km from the proposed Mona array area but identifies other operational, consented and proposed offshore wind projects which would be closer. • Having regard to the provisions of paras 2.8.197-198 of NPS EN-3 and the particular circumstances of this case, the ExA requests that the Applicant undertakes an assessment of potential wake effects on other operational and consented offshore wind farms in the vicinity of the Proposed Development. At Deadline 3, can the Applicant set out a timeframe for the completion and submission into the Examination of this assessment, which must be by Deadline 6 at the latest (and earlier if possible) in order to allow an opportunity for other IPs to comment on the findings.	The Applicant notes the ExA's request for an assessment of potential wake effects on other operational and consented offshore wind farms in the vicinity of the Mona Offshore Wind Project. The Applicant considers that the submission of a wake assessment is not appropriate or necessary according to the EIA Regulations and associated guidance in NPS policy. The information within the Environmental Statement and application documents is considered more than adequate to demonstrate that the NPS policy tests have been met and therefore as such, there is no requirement to submit a further assessment. **Policy and legislative context** Applications for development consent under the Planning Act 2008 must be submitted with an Environmental Statement that accords with the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ("EIA Regulations") to ensure that the application meets the legal requirements of those regulations. The Application should also contain sufficient information to allow the Examining Authority and Secretary of State to assess the application against the relevant policy in the NPS. The core purpose of the EIA process and the reporting within an Environmental Statement is to set out the likely significant effects on the environment from a proposed development. This allows Interested Parties to participate in the consent process and enables the Secretary of State to make an informed decision on the application. An Environmental Statement is required to assess and report on the various factors set out in reg.14 and sch.4 of the EIA Regulations. The content of an Environmental Statement will also be informed by guidance published by relevant industry and professional bodies, and policy requirements set out in the NPS.

Reference	Question to	ExQ1	Applicant's response
			The Applicant does not consider that potential energy loss of existing operational wind farms to be a matter that requires to be assessed and reported on within an Environmental Statement. The Applicant does not consider this to be within the scope or requirements of the EIA Regulations. Paragraph 2.8.198 of NPS EN-3 states that any assessment should be "in accordance with appropriate policy and guidance for offshore wind farm EIAs". There is no published guidance by industry or professional bodies that suggests such an assessment is required, or how such an assessment would be undertaken. In respect of the NPS, the Applicant considers that on a proper reading of the NPS as a whole, it is clear that a 'wake assessment' is not required. The proposed development, by the nature of its purpose, is to generate clean green energy to help the UK reach its net zero target by 2050. The Round 4 portfolio across the UK is the equivalent of an additional c.8GW of new offshore wind projects by the end of the decade, which is enough to power more than seven million homes and deliver the step-change in the UK's journey to net zero by 2050. NPS EN-1 recognises that this target necessitates a dramatic increase in the volume of new large-scale energy development, which will not be possible without some level of residual impacts (paras 3.1.1 and 3.1.2). For Critical National Priority infrastructure, the starting point is a presumption that the needs case for those projects outweigh the residual effects in all but the most exceptional cases (para 4.1.7). NPS EN-3 encourages developers to maximise the capacity of new large-scale energy development within technological, environmental and other constraints (EN-3 para 2.8.2). To the extent that new large-scale energy development results in minimal energy loss for operational projects, the Applicant submits that the considerable net benefit delivered by the new development should be afforded very great weight in the planning balance.

Reference	Question to	ExQ1	Applicant's response
			NPS-EN-1 sets out the urgent need for new large-scale renewable energy projects, recognising that it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts (para 3.1.1 and 3.1.3). The NPS directs developers to minimise effects in accordance with the policy set out in Part 4 and Part 5 of EN-1 and the technology specific NPS. EN-3 paragraph 2.5.2 sets out that proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage. EN-3 goes on to set out what applications for specific technology types should consider. Paragraph 2.8.2 directs all offshore wind developments to maximise their capacity within the technological, environmental, and other constraints of the development. EN-3 recognises that offshore wind development will occur in or close to areas where there is other offshore infrastructure (para 2.8.196 and 2.8.197) and that there is potential for adverse impacts on those activities as a result. The key tests for the Secretary of State to consider are: • Whether they can be satisfied that the risk to other industries has been reduced to as low as reasonably practicable (para 2.8.344); and • That site selection and site design has been undertaken with a view to avoiding or minimising disruption or economic loss or any adverse effect on safety to other offshore industries (para 2.8.345). • Where a proposed development is likely to affect the future viability or safety of an existing or approved/licensed offshore infrastructure or activity, the Secretary of State should give these adverse effects substantial weight in its decision-making (paragraph 2.8.347). The Secretary of State is directed to take a pragmatic approach when considering such impacts (para 2.8.343).

Reference	Question to	ExQ1	Applicant's response
			The Applicant post-consent will go through the final design process, which may include refinement of number of wind turbines, refinement of wind turbine spacing and refinement of wind turbine position within the Mona Array Area (in accordance with the layout principles set out in Table 3.7 of the Project description chapter APP-050), following the completion of detailed site investigation campaigns and selection of wind turbine model through a competitive procurement process. The need to balance competing interests, whilst achieving the overarching policy aims for offshore wind development in the UK was recognised by TCE in setting the parameters for the Round 4 Lease Areas. This is set out in the study prepared for TCE by Frazer-Nash Consultancy Limited (2023), which states: '*TCE wishes to designate offshore wind project development areas (PDAs) to maximise the energy production from the portfolio of existing and future wind farms, whilst balancing environmental and other requirements*.' Within their leasing process, TCE determined that a separation distance of 7.5 km between Round 4 developments and existing offshore wind farm infrastructure was appropriate. TCE took account of minimising impacts on other licensed activities in reaching that conclusion. TCE specified that no Round 4 offshore wind project could be located within 7.5 km of an existing offshore wind farm, unless the owner of the existing offshore wind farm has given its written consent (TCE, 2019). Further to meeting TCEs spacing criterion, the Applicant during the pre-application phase has taken the steps required by the relevant NPS policy to further minimise potential impacts. The Mona Array Area was reduced following receipt of statutory pre-application consultation responses on the Preliminary Environmental Information Report (PEIR), as described in Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-016). The Applicant considers that the application contains sufficient information to allow the Examining Authority and the Secretary of state to reach a

Reference	Question to	ExQ1	Applicant's response
			reasoned conclusion on the matters set out in paragraphs 2.8.344 – 2.8.347. The Applicant does not consider that paragraphs 2.8.197 – 2.8.198 require any further assessment to be undertaken.
Q1.19.2	The Applicant	**Potential wake effects** • Respond to submissions from the Ørsted IPs [REP1-072] that consideration of the potential effect on the energy yield of other operational offshore wind farms is not just an economic matter but also one of good design (for example in respect of para 2.5.2 of NPS EN-3) and is relevant to considerations of the climate change benefit of the Proposed Development. • Submit a copy of the 2023 Frazer-Nash study referred to in Section 10.5 of [APP-062], [PDA-008] and [REP2-078].	The Applicant acknowledges Ørsted IPs' concerns about energy loss. However, the Applicant considers that this issue must be viewed and balanced in terms of the positive contribution of the Mona project to support net zero by 2050. The Applicant has set out in response to Q1.19.1 above the policy and legislative context for consideration of negative effects on energy yield of other operational offshore wind farms. As set out in paragraph 2.5.2 of NPS EN-3, 'good design' will take account of a wide range of environmental factors. Chapter 4: Site selection and consideration of alternatives (AS-016) of the Environmental Statement summarises the Applicant's site selection and design process, including how the Applicant responded to consultation responses through the pre-application phase to avoid and mitigate potential impacts so far as possible. To the extent that the 'good design' requirements of paragraph 2.5.2 apply to effects on energy yield, the Applicant considers that this has been demonstrated through adherence to the TCE spacing criterion for Round 4 developments and through the design refinements made following statutory consultation, which increased separation distance to operational wind farms, all as set out in more detail in Q1.19.1 above. The Frazer-Nash study is available in Appendix document S_D3_25.8 Appendix to ExQ1 Q1.19.2 2023 Array Layout Yield Study.
Q1.19.4	*The Ørsted IPs* The Applicant	**Potential wake effects – DCO Requirement** In the event that no wake assessment was undertaken during the Examination, the Ørsted IPs refer to Requirement 25 of The Awel y Mor Offshore Wind Farm Order 2023 which is focussed on the interaction with Rhyl	The Applicant has set out in more detail in response to Q1.19.1 above why it considers a wake assessment is not required by relevant policy or legislation, and is unnecessary to reach a reasoned conclusion on the applicable policy tests within the NPS. The Applicant maintains that

Reference	Question to	ExQ1	Applicant's response
		Flats Wind Farm in light of its geographical proximity. The ExA is clear that any such Requirement would need to meet the relevant legal and policy tests and would introduce an additional pre-construction approval responsibility upon the Secretary of State. As such it should only be considered as a last resort and if supported by substantive evidence. *To the Ørsted IPs:* • *On what basis do you consider that such a Requirement would be justified in this case?* *To the Applicant:* • *Noting your position [REP2-078] that such a Requirement would be unnecessary, do you wish to make any further submissions on this matter?*	imposing a Requirement as suggested by the Ørsted IPs would be unnecessary and would not meet the relevant policy tests. A fundamental principle of planning law and policy is that conditions/requirements should be kept to a minimum and only used where they satisfy the policy tests set out in national planning policy (see EN-1 paragraphs 4.1.16 – 4.1.18; NPPF paragraph 55). These tests require that any requirement/condition is: 1) necessary, 2) relevant to planning, 3) relevant to the development to be permitted, 4) enforceable, 5) precise, and 6) reasonable in all other respects. The applicant has set out in response to Q1.19.1-3 above that there is no legal or policy basis for a wake effects assessment, why this is not a planning matter. Imposing such a requirement would fail tests 1) and 2). Furthermore, the Applicant has set out in Q1.19.1 why there is an inherent uncertainty in assessing wake effects. The Applicant does not consider that the a requirement of the nature suggested would be sufficiently precise in what it seeks to control, failing test 3). Since the consenting of the Awel y Môr project and inclusion of a condition relating to wake effects within that DCO, this issue is being raised (by a discrete number of developers, but pre-dominantly, Ørsted) across several Round 4 consent applications. The Applicant notes that, to its knowledge, prior to and including the Awel y Môr decision the consideration of wake effects had not been considered within the assessments of an offshore wind farm consent application within the UK. The Applicant considers that it has met the requirements within the NPS and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the "EIA Regulations"), and that no further information is required to be provided as part of the DCO application for the Mona Offshore Wind Project. The Applicant maintains that the need for a requirement does not meet the tests set out within the NPS and NPPF, would be unreasonable and unnecessary and would create further uncertainty in the offshore wind

Reference	Question to	ExQ1	Applicant's response
			development industry, leading to significant project risk and ultimately could affect the net-zero strategy of the UK leading to longer term negative impacts on the cost of energy (and security).
Q1.19.6	The Applicant	**Proposed Microsoft submarine telecommunications cable** With reference to [REP1-069]: • Has this proposed project been included in the assessment of cumulative effects? If not, does it need to be added to [APP-084] and assessed for the relevant ES topic chapters?	A review of the Cumulative Effects Assessment (CEA) to account for recently published information on other projects, plans and activities (including the proposed Microsoft submarine telecommunications cable) has been completed for Deadline 3. This is presented in the Review of Cumulative Effects Assessment and In-Combination Assessment (S_D3_18). The conclusions of this review are that none of the projects, plans and activities considered, including the proposed Microsoft submarine telecommunications cable, would result in any increases of significance of cumulative effects to those presented in the application.
Q1.19.7	The Applicant *Morecambe Offshore Windfarm Limited*	**Co-operation or co-existence agreement** Further to [RR-046] and [PDA-008] section 2.46, can the Applicant and Morecambe Offshore Wind Farm Limited provide an update on their discussions regarding potential cumulative effects and the principle (and if relevant, function and form) of a co-operation or co-existence agreement between the projects?	Mona Offshore Wind Ltd and Morecambe Offshore Windfarm Ltd enjoy a collaborative working relationship established in 2021 to jointly consider potential cumulative regional shipping and navigation matters and as a result of a joint transmission network DCO application that Morecambe Offshore Windfarm Ltd is promoting with Morgan Offshore Wind Ltd. Both the Mona and Morgan projects are part of the joint venture between EnBW and bp. Therefore, through our established relationship, Mona Offshore Wind Ltd and Morecambe Offshore Windfarm Ltd have agreed that any requirements for co-existence or co-operation agreements can be managed between the parties outside of the DCO process. Currently, no such agreements are anticipated by the parties to be required. In terms of cumulative effects, Mona Offshore Wind Project has submitted a 'Review of Cumulative Effects Assessment and In-Combination Assessment' (S_D3_18) (the "Review") at Deadline 3 which has been prepared to supplement the cumulative effects assessments (CEA) undertaken for the Mona Offshore Wind Project within the topic specific chapters in Volumes 2, 3 and 4 of the Environmental Statement (APP-052 to APP-078) with any relevant updates to the CEA Long List. In terms of Morecambe Offshore Windfarm: Generation Assets, the Review recognises the change in 'tier status' from Tier 2 to Tier 1 (application submitted) and availability of updated data associated with the

Reference	Question to	ExQ1	Applicant's response
			Environmental Statement. The results of the Review conclude that no additional potential significant cumulative effects have been identified. However, where additional work has been identified, for example, with respect to offshore ornithology, the parties will engage to inform and support each other's applications. In addition, the Applicant is engaging with Morecambe Offshore Windfarm Ltd regarding the request for quantification of offshore ornithology impacts from historical offshore wind projects by the statutory nature conservation bodies (SNCBs). The methodology for undertaking this work was developed collectively by the Mona Offshore Wind Project, Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Windfarm: Generation Assets. Each project will take the agreed methodology forward for consideration in the separate examinations. The results for Mona Offshore Wind Project have been submitted at Deadline 3 within the 'Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note' (S_D3_12).

2.20 Seascape and Visual Resources

Table 2.20: Response to ExQ1: Seascape and Visual Resources Questions

Reference	Question to	ExQ1	Applicant's response
Q1.20.3	*NRW (A)* The Applicant	**Visual effects** In [REP1-056] Annexe B, paragraph 367, referring to guidance from NRW's evidence base, it states that "The array is not located 'beyond the limit of negligible visual effects, particularly for the highest sensitivity area National Parks/AONB's overlaid with heritage coasts". • What does NRW consider to be the limit of negligible visual effects for the IoANL ,ENP and the CRDV National Landscape? • What is The Applicant's view on this?	The Applicant wishes to highlight that heritage coasts are not a landscape (or a heritage) designation. Heritage coasts are 'defined' rather than designated. OESEA4 (DBEIS (2022); referring to White Consultants (2020) at page 369) bases the 'threshold' of no significance as follows (emphasis added): "*A separate large wind farm scenario of around 80 turbines of 350m and 400m (20MW+) height was also analysed which concluded that for highly sensitive receptors the threshold of no significance was well beyond 35km (35-44km), and for medium sensitivity receptors was well beyond 24km (24-35km).*" The maximum design scenario for the Mona turbines is a tip height of 364 m. Extrapolating from the White Consultants (2020) study, a 'threshold' of no significant effects for Mona could therefore be expected to be towards the lower end of the 35 km to 44 km range noted by DBEIS (2022) which considered 350 m to 400 m turbines. However, as noted in the Applicant's previous submissions, the White Consultants (2020) buffer study is based purely on analysis of wirelines and does not take account of any other relevant factors, which is not the approach advocated in NPS EN-3 (DBEIS, 2024) and OESEA4 (DBEIS, 2022). The Applicant has outlined in REP2-080, in response to NRW's REP1-056.322, the other factors which should be taken into consideration when determining magnitude of impact. The Applicant also notes, as outlined in REP2-080, that distance is only one of the factors which can affect visibility, and subsequently the magnitude, of the impact. In line with OESEA4 (DBEIS, 2022), the Mona seascape and visual resources assessment took account of the following factors, alongside distance, when defining the magnitude of impact: • curvature of the earth • object characteristics (including the height and dimensions of all proposed offshore infrastructure)

Reference	Question to	ExQ1	Applicant's response
			• visual acuity • atmospheric conditions (air clarity, air humidity, the background cloud cover, haze, the degree, direction and elevation of sunlight which can reduce the contrast, even at distances within the range of visibility).
Q1.20.5	*NRW (A)*	***Response to RRs*** *To what extent does the Applicant's response in [PDA-012] address your points raised in [RR-011], paragraph 3.1.2.7, concerning cumulative wireline visualisations, relevant viewpoints, and the inclusion of the Mona Onshore Substation Awel Y Mor substation and other Tier 1 Developments?*	The Applicant notes that this question is directed to NRW (A). However, in response to REP2-080, as requested by NRW (A), the Applicant has provided additional cumulative photomontages illustrating the Mona onshore substation, the Awel y Môr onshore substation and the National Grid Bodelwyddan substation extension in S_D3_16.1 Updated Visualisations Representative Viewpoints Part 1 and S_D3_16.2 Updated Visualisations Representative Viewpoints Part 2). In order to incorporate the Awel y Môr onshore substation and the National Grid Bodelwyddan substation extension, information sufficient to be able to be used for a photomontage is required. The information available for the National Grid substation extension only includes its location and maximum parameters. The following information (which is likely to affect the scale and extent of cumulative impacts from views) is not in the public domain regarding the National Grid Bodelwyddan substation extension and has therefore not been included in the photomontages: • other than the maximum dimensions (height and width) associated with the Bodelwyddan substation extension, no further information is available. The Applicant has therefore included the Bodelwyddan substation extension as a box in the cumulative photomontages associated with these maximum dimensions • any proposed mitigation measures in association with the Bodelwyddan substation extension • detail of the removal of an existing pylon and the addition of two pylons for the Bodelwyddan substation extension project.
Q1.20.6	*NRW (A)*	***SLVIA viewpoints*** *In [REP-1-056] paragraph 374, you state that "Existing offshore wind farms are either not visible from or have a*	The Applicant notes that this question is directed to NRW (A). However, in response to REP2-080, as requested by NRW (A), the Applicant has provided additional cumulative wirelines which include the Awel y Môr

Reference	Question to	ExQ1	Applicant's response
		negligible impact on the majority of SLVIA viewpoints". Would this still be true after the construction of the Awel Y Mor Offshore Wind Farm?	offshore wind farm in S_D3_15 Seascape and Visual Resources: Cumulative Wirelines. The cumulative wirelines presented in S_D3_15 Seascape and Visual Resources: Cumulative Wirelines, have been undertaken with the blades on all wind turbines in the vertical (unrealistic) orientation, as requested by NRW (REP1-056). The wirelines, including cumulative wirelines, in Volume 2, Chapter 8: Seascape and visual resources (APP-060) were produced with wind turbines blades in a varied (blades shown in an unsynchronised realistic rotation) orientation. The Applicant notes that no guidance specifies whether turbine blades should be vertical for offshore wind farms in illustrative wireline diagrams, although SNH 2017 recommends it for onshore wind farms. Illustrative wireline diagrams in key guidance documents show turbine blades using different approaches, as follows: <u>Vertical:</u> • OESEA4 (DBEIS, 2022) • An assessment of the sensitivity and capacity of the Scottish seascape in relation to windfarms (SNH, 2005) • Visual Representation of Wind Farms Guidance: Version 2.2 (SNH, 2017) <u>Varied:</u> • Seascape Assessment for Wales (Briggs and White, 2009; Appendix 2) • Visualisation Standards for Wind Energy Developments (The Highland Council, 2016) • Seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance Stage 1 - Ready reckoner of visual effects related to turbine size - Report No 315 (White, 2019; section 8) • Offshore Energy Strategic Environmental Assessment: Review and Update of Seascape and Visual Buffer study for Offshore Wind Farms (White, 2020; Appendices E3, E4 and E6). Photomontages in the above documents (where they are used) all illustrate a varied orientation of turbine blades.

Reference	Question to	ExQ1	Applicant's response
			It should be noted that the situation where all turbine blades are vertical would never occur and that wirelines are diagrams only and do not reflect reality. The Applicant notes, as outlined in REP2-080 and the Applicant's response to REP1-056.230, that wirelines should be used as a guide/worst case and combined with observations from site visits to draw a conclusion on the magnitude of impact. Therefore, the change in orientation of the turbine blades in S_D3_15 Seascape and Visual Resources: Cumulative Wirelines, does not change the conclusions of the assessment.
Q1.20.7	The Applicant	**Design Life** In [REP1-056] paragraph 388, NRW state that "Whilst the 'design life of the Mona Offshore Wind Project is likely to be 35 years' [Paragraph 1.4.1.2, APP-048] repowering/replacing the turbines within the 60- year lease period is reasonably likely". • Can you comment on the likelihood of replacement of the turbines in the 60-year lease period? • Are the visual impacts that could occur within this period as a result of any turbine replacement still considered to be reversible?	During The Crown Estate 60-year lease, there may be a requirement for reasonable improvement. If there are changes in technology, it may be desirable to 'repower' the Mona Offshore Wind Project at or near the end of the design life (i.e. reconstruct and replace wind turbines and/or foundations with those of a different specification or design). If the specifications and designs of the new wind turbines and/or foundations fall outside of the maximum design scenario or the impacts of construction, operations and maintenance, and decommissioning were to fall outside those considered by the Environmental Statement, repowering would require a further consent (and EIA). The turbines within the Mona Offshore Wind Project have a 35-year operational life, and this has formed the basis of the Environmental Impact Assessment (EIA). Volume 2, Chapter 8: Seascape and visual resources (APP-060) concluded that the magnitude of impact from the operations and maintenance phase of the Mona Array area would be of "*long-term duration and continuous*". Although outside of the remit of the Environmental Statement, the Applicant notes that if turbines were to be in place for 60 years, the magnitude of impact would still be of 'long-term duration and continuous' and therefore this would not change the conclusions of the seascape and visual resources assessment.
Q1.20.8	The Applicant	**Statutory Designated Landscapes** Can the Applicant respond to the points raised by NRW in [REP1-056], sections 1.4 to 1.12, concerning the SLVIA and the assessment of effects on the special	The Applicant has provided a response to each point raised by NRW in REP1-056, Annex B sections 1.4 to 1.12, in REP2-080, rows REP1-56.319 to REP1-056.406.

Reference	Question to	ExQ1	Applicant's response
		characteristics and settings of statutory designated landscapes and receptors within those landscapes?	
Q1.20.11	The Applicant *NRW (A)*	**Landscape enhancement scheme** R24 of the AyM Offshore Wind Farm DCO secures a landscape enhancement scheme which would include measures to compensate for the impact on the IoANL, ENP and Great Orme Heritage Coast. • Would a requirement akin to R24 be appropriate for the Mona Offshore Wind Farm DCO? • If not, why not?	No significant visual effects or significant effects on the special qualities of the four nationally designated landscapes (Isle of Anglesey National Landscape, the Clwydian Range and Dee Valley National Landscape, Eryri National Park, the Lake District National Park), as well as the three internationally designated landscapes (The Slate Landscape of Northwest Wales, The Castles and Town Walls of King Edward in Gwynedd and The English Lake District UNESCO World Heritage Sites) are predicted to arise as a result of the offshore elements of the Mona Offshore Wind Project on its own. The Applicant, therefore, concludes that no landscape compensation scheme is required for the Mona Array Area. The Applicant notes that the Awel y Môr Offshore Wind Farm concluded that the offshore elements of the project will have a significant effect on the Isle of Anglesey National Landscape and Eryri National Park, as well as receptors within non-statutory designated landscapes, including the Great Orme Heritage Coast and the North Anglesey Heritage Coast (RWE Renewables UK, 2023; AS-027)). Awel y Môr Offshore Wind Farm cannot fully mitigate the adverse effects on designated landscapes without affecting the economic viability of the project. As such, the landscape enhancement scheme through Requirement 24 of the Awel y Môr Offshore Wind Farm Order 2023 compensates for the significant adverse effects relating to the Isle of Anglesey Area of Outstanding National Beauty, Eryri National Park and Great Orme Heritage Coast by strengthening, reinforcing or enhancing their features, distinctiveness, special qualities or sense of place over the long-term.
Q1.20.12	The Applicant *NRW (A)*	**National Landscapes** In exercising or performing any functions in relation to, or so as to affect, land in an AONB (now National Landscapes), Section 85 of the Countryside and Rights of Way Act places a duty on the relevant authority to have regard to the purpose of conserving or enhancing the natural beauty of the AONB.	No significant visual effects or significant effects on the special qualities of the four nationally and three internationally designated landscapes (named in the Applicant's response to Q1.20.11, above) are predicted to arise as a result of the offshore elements of the Mona Offshore Wind Project. The offshore elements of the Mona Offshore Wind Project therefore do not affect the conservation of the nationally and internationally designated landscapes.

Reference	Question to	ExQ1	Applicant's response
		• Can the Applicant provide comments on why it considers the relevant authority could be satisfied the duty placed on it would be complied with if development consent for the Proposed Development were to be granted? • Can NRW comment on if the implementation of a suitable enhancement scheme as described above would allow the duty to be complied with?	
Q1.20.13	The Applicant	**Offshore Lighting Levels** Table 8.18,[APP-060], describes measures taken concerning aviation lighting to reduce the impacts and effects of the Mona Offshore Wind Farm project. It is stated that lighting levels may rise to 2000 Candelas for poor visibility weather conditions, and that "Lighting levels are secured as a Requirement of the Draft DCO". However, R3 of the dDCO, which relates to aviation lighting, does not specify lighting intensity levels Can you signpost to where the lighting intensity levels are specified in the dDCO? • If they are not specified, can you explain why? • Do the lighting levels described in the SLVIA also apply to the Offshore Service Platforms? • Does the assessment undertaken in [APP-060] assume a maximum intensity of 2000 Candelas? • Do the illustrative nighttime views shown in the SLVIA visualisations [APP-106], [APP-107], [APP-108], [APP-110], and [APP-111] show the brightest intensity or a lower intensity for clearer conditions?	**Lighting intensity specified in the dDCO** Lighting intensity levels are specified in requirement 3 of the Draft Development Consent Order (REP2-002). Requirement 3 (3) states that "*The lights installed in accordance with sub-paragraph (1) will be operated at the lowest permissible lighting intensity level*." Given the lighting levels will be at the lowest permissible level, the Applicant is unable to specify the intensity. **Lighting level applicability to Offshore Service Platforms** Marine navigational lights will be fitted at the platform level on Significant Peripheral Structures (SPS), which may include Offshore Service Platforms (OSPs). These lights will be synchronized to display simultaneously an International Association of Marine Aids and Lighthouse Authorities (IALA) 'special mark' characteristic, flashing yellow, with a range of not less than 5 nm. The ReSoft software used to generate the night-time visualisations only models turbines and their associated lighting, it does not model offshore service platforms and their associated lighting. The offshore service platforms are therefore included in the night-time visualisations as turbines and the assessment has been undertaken accordingly. However, as noted under heading 'Illustrative night-time views show the brightest intensity or a lower intensity for clearer conditions', night-time photography has been taken in clear weather conditions, in which 200 candelas would be used. Therefore, the night-time visualisations, which were undertaken at 2,000 candelas are an over-estimation of the night-time impact. **Assessment assumes a maximum intensity of 2,000 candelas**

Reference	Question to	ExQ1	Applicant's response
			The ReSoft software used to generate the night-time visualisations automatically sets the lighting levels at the brightest intensity, 2,000 candelas. In good visibility conditions, the aviation lighting will be kept to 200 candelas. In poor visibility (e.g. foggy conditions), the lighting levels may rise to 2,000 candelas. The visualisations have used the worst case (2,000 candelas) for the aviation lighting, which is a situation which would never occur, as in clear conditions the level of light used would be 200 candelas. The higher lighting intensity would only be used in poor visibility conditions, in which situations, the aviation lighting would not be visible from shore due to the poor visual conditions. **Illustrative night-time views show the brightest intensity or a lower intensity for clearer conditions** The night-time photography has been taken in clear weather conditions, in which 200 candelas would be used. Therefore, the night-time visualisations, which were undertaken at 2,000 candelas, are an over-estimation of night-time conditions (see Volume 2, Chapter 8: Seascape and visual resources (APP-060), paragraph 8.8.2.46).

2.21 Socio-economics

Table 2.21: Response to ExQ1: Socio-economics Questions

Reference	Question to	ExQ1	Applicant's response
Q1.21.2	The Applicant	**Welsh Language** The Applicant's submissions in [REP2-079], ref REP1-052.8 are noted. Can the Applicant respond to the recommendation of the Welsh Government [REP1-051], pages 5-6 that [APP-045] is assessed by an experienced language planning practitioner?	The Applicant would highlight that the Community and Linguistic Impact Assessment for the Mona Offshore Wind Project [Document Reference APP-045] has been prepared by competent practitioners, both of whom are Chartered Members of the Royal Town Planning Institute and each have over 10 years of experience in preparing Welsh Language Impact Assessments, including in relation to large infrastructure projects. Both practitioners are Welsh speakers and work and live in North Wales and have extensive local knowledge of the area, including an understanding of the importance of the Welsh language and culture and the role that it plays in community life locally. The Applicant considers that these qualifications and experience meet the guidance provided in the Anglesey and Gwynedd Supplementary Planning Guidance: Maintaining and Creating Distinctive and Sustainable Communities (2019) in relation to a 'competent person' who should prepare Welsh Language Impact Assessments. The Applicant considers that a separate review of the Community and Language Impact Assessment by a language planning practitioner is not necessary and is not required in the relevant guidance, The Community and Linguistic Impact Assessment [Document Reference APP-045] has been prepared in accordance with the relevant SPGs in relation to Welsh language and impact assessments
Q1.21.4	The Applicant	**Community benefits and local ownership** Further to [REP2-079], ref REP1-052.5, could you clarify your position in respect of local ownership?	The Applicant notes that local ownership is not referred to within any of the relevant energy National Policy Statements, or required within any UK government policies. However, the Applicant is aware of the Welsh Government's guidance on Local and shared ownership of energy projects in Wales (Welsh Government, 2022). As that guidance notes, offshore wind projects are, relative to other technologies and scales of projects, difficult to develop and finance, and may be more suitable to ownership by large organisations with strong finance and governance, rather than community ownership. The ownership of Mona Offshore Wind Limited is by two such large and well governed organisations (see APP-025). The

Reference	Question to	ExQ1	Applicant's response
			Applicant also notes the point made by Welsh Government in REP-051 that 'the process for leasing sites for offshore wind does not allow the community ownership guidance to be followed'. The Applicant does not intend to provide for local ownership of the Mona project. Development of large and complex Critical National Priority infrastructure requires experienced ownership, and ownership models that do not risk conflicting with, or adding additional complexity to, other obligations that project may have under Contracts for Differences, OFTO sale processes governed by Ofgem, as well as funding models that owners may need to employ in order to finance delivery of the project. As such, local ownership is not appropriate for a project such as Mona. The Applicant would also note that the Welsh Government guidance sets out that larger and more complex developments, such as Mona, assist in the delivery of more strategic benefits for 'all of Wales'. This includes delivery of wider benefits, including the core benefits of emissions reduction from displacing fossil fuel generation, and direct economic benefits from local resources and labour. Mona will deliver benefits of this nature, as set out in APP-076 and APP-077. These benefits are also aligned with Objectives 2 and 3 of the Welsh National Marine Plan, regarding economic benefits and carbon reduction. Mona will also deliver a number of other wider benefits, as defined in the Welsh Government guidance, including, but not limited to, development of skills and employment (see APP-210), and community benefits (see the Applicant's response to REP1-052.5 in REP2-079).
Q1.21.5	The Applicant	**Outline Skills and Employment Plan (OSEP)** Section 1.2 of [APP-210] identifies opportunities for collaboration and alignment with OSEPs for other proposed projects being promoted by bp/EnBW. Can further detail be added now that the application for the Morgan Generation Assets has been submitted?	Section 1.2 of The Outline Skills and Employment Plan (APP-210) refers to possible synergies between projects being promoted by bp/EnBW, should the Mona, Morgan Generation, and Morgan and Morecambe Transmission Assets Consent Orders be granted. The Applicant will consider what such synergies may be in the development of the final Skills and Employment Plan, when further information on the detailed design of the respective projects, including selection of supply chain partners and port facilities is

Reference	Question to	ExQ1	Applicant's response
			known. Given that detail is not currently available the OSEP cannot be updated in this respect at this time. The Applicant notes that section 1.2.1.2 of APP-210 should refer to the Skills and Employment Plans for the three projects, rather than the outline plans for them, for the reasons set out above. The Applicant will provide a new draft of the current OSEP at Deadline 4 to reflect this amendment.
Q1.21.6	The Applicant	**OSEP** • Whilst acknowledging that [APP-210] is an outline plan, can it include a stronger commitment that proper monitoring and evaluation of whatever measures become final commitments in the Skills and Employment Plan will take place, in order to measure the effectiveness of the plan? 4. Following finalisation of the Skills and Employment Plan, what are the mechanisms for ongoing scrutiny of, and engagement on, the Plan and should the OSEP include a firmer commitment in this regard? What would happen if post-consent evaluation found that the objectives of the Skills and Employment Plan were not being met?	The Applicant would draw attention to section 1.9 of APP-210, which sets out that an approach to monitoring will be developed as part of the final Skills and Employment Plan, with consultation undertaken on that approach in line with consultation on the wider plan. The Applicant anticipates this may include regular meetings with the relevant Local Authorities and other key stakeholders including the Regional Skills Partnership, to discuss the implementation of the plan and provide scrutiny on the delivery of the objectives and commitments. The Applicant will provide a new draft of the current OSEP at Deadline 4 to include additional context to the expected monitoring to be agreed in the final plan.
Q1.21.7	The Applicant and *Isle of Anglesey County Council (IoACC)*	**OSEP** What progress has been made between the parties on the matters raised by the IoACC [REP1-023], ref IoACC.SE.13, in relation to the content of the OSEP [APP-210]?	The Applicant recognises the potential for the Mona Offshore Wind Project to positively contribute to the skills and employment agenda in the North Wales region. The Applicant concurs that a comprehensive, strategic approach including early engagement with key stakeholders will ensure the maximum impact in the long term. As noted in the OSEP, its purpose is to set out an outline approach that will be finalised following the grant of the DCO. The work of creating the final skills and employment plan, which will be informed by a community needs analysis, is in progress, following much of the same approach as that suggested by the Isle of Anglesey County Council (IoACC).

Reference	Question to	ExQ1	Applicant's response
			This work is being led by the Project's Stakeholder Engagement Manager, based in North Wales, who is implementing a programme of engagement. As part of this the Project is represented on the Board of the Regional Skills Partnership (RSP) and attends all its meetings, and is due to join its newly set up sub-group, the Advanced Manufacturing and Energy Employer Cluster Group. Following one-to-one meetings between the Applicant and RSP senior officers, the RSP has agreed to act as a gateway and facilitate discussions with partners in the skills and employment sector in North Wales, to ensure an informed, coordinated approach and the sharing of best practice. As part of the Applicant's engagement programme in this regard, one-to-one meetings have either been held or scheduled to be held with all the key stakeholders suggested by IoACC. More informal relationships are already in place with every organisation listed, through regional fora and networking groups. It has become apparent to the Applicant through engagement to date that there is an appetite from key stakeholders for a mapping and analysis exercise to understand the timescales and requirements of other projects in the region, exactly as the IoACC suggests in its representation. The Applicant understands that this exercise is currently in progress, coordinated at a regional level. The above approach was discussed with the IoACC at a meeting with the Applicant's Stakeholder Engagement Manager, held on 4 September 2024. It was agreed that the Applicant and IoACC would continue to meet periodically to share progress on this subject. In order to make possible the above strategic approach and the sustainable development of long term relationships, the Applicant does not feel it is appropriate to update the substance of the OSEP at this stage, but rather, continue meaningful engagement in order to develop – and consult on – a final, comprehensive Skills and Employment Plan ahead of the commencement of the project. A new draft of the current OSEP submitted

Reference	Question to	ExQ1	Applicant's response
			at Deadline 4 will however include amendments as per Q1.21.5 and Q1.21.6.
Q1.21.8	The Applicant	**Skills and Employment Plan** Requirement 19 of the dDCO [REP2-004] provides that a Skills and Employment Plan must, following consultation with the relevant authorities, be notified to those authorities. 5. Can the Applicant explain why this Requirement seeks notification of, rather than approval from, the relevant authorities, particularly in light of para 5.13.12 of NPS EN-1? 6. Why is R19 contingent on the commencement of 'onshore works', rather than on commencement of the authorised project? In the interests of certainty, can 'substantially' be deleted from R19(2)?	The Applicant notes the wording of NPS EN1 para 5.13.12 and will amend the wording in Requirement 19 of the dDCO [REP2-004] at Deadline 4 to reflect this. The wording of the requirement will include approval of the Secretary of State, following consultation with the wider group of relevant authorities. The approval of the SoS, rather than the Local Authorities, is required as the SEP is a project wide plan, including elements outside the local authorities, or NRWs, as the Marine Licensing Authority, jurisdiction. The Applicant is also keen that the final approval of the SEP can align, and not contradict, any skills and employment commitments that may be required under the Supply Chain Plan, and element of the CfD (Contract for Difference) process, that the SoS would also be responsible for approving. The Applicant will update Requirement 19 to be contingent on commencement of the authorised project, rather than the onshore works, and will delete 'substantially' from limb (2) of the Requirement. These changes will be made in the updated dDCO to be submitted at Deadline 4.
Q1.21.11	The Applicant	**Potential effects on Tan-y-Mynydd Trout Fishery** How do you respond to submissions by Tan-y-Mynydd Trout Fishery Ltd [REP1-080] that the business should be provided with a suitable legal undertaking or indemnity to protect its interests in the event that the proposed onshore construction works adversely affected the water source supplying the fishery?	The Applicant would note that the Tan-y Mynydd Trout Fishery is outside the order limits, however it is engaging with the Tan-y-Mynydd Trout Fishery to understand further the potential for impacts on the fishery during construction. Water monitoring is taking place and construction impacts will be managed through the provisions of the Code of Construction Practice. The Tan-y Mynydd Trout Fishery Applicant does not consider that a legal indemnity or undertaking is needed outside of the protection provided by the CoCP and through a potential Category 3 claim.

2.22 Traffic and Transport

Table 2.22: Response to ExQ1: Traffic and Transport Questions

Reference	Question to	ExQ1	Applicant's response
Q1.22.1	The Applicant	**Cumulative Effects** The Council's LIR [REP1-049] raises concern over the 1km study area being appropriate for the CEA. • Can you justify why a wider, more strategic assessment has not been undertaken in this regard? • Can you provide justification on the approach taken on excluding sites from the CEA where no information was available rather than making appropriate assumptions?	The Applicant's response to this question is provided in S_D3_25.8 Appendix to ExQ1 Q1.22.1 Traffic and Transport Cumulative Effects Assessment Study Area.
Q1.22.4	*DCC, CBBC*	***dDCO*** *In the LIR [REP1-049], you raise concerns over the disapplication of the Road Traffic Regulation Act 1984. With reference to the proposed powers in Articles 10 to 15, Part 3, Streets of the dDCO, what, if any, amendments do you consider necessary and why.*	The Applicant notes Q1.22.4 is directed towards others but has provided a response to assist the ExA. In the Response to Conwy County Borough Council and Denbighshire County Council Local Impact Report (REP2-086) the Applicant confirmed at row REP1-049.70 that it would provide at Deadline 3 an updated Outline Highways Access Management Plan in light of the comments raised by Conwy Borough County Council and Denbighshire County Council. The Applicant also noted in REP1-049.70 of its intention 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. The Applicant and Conwy Borough County Council and Denbighshire County Council met during week commencing the 23rd September to discuss the statement of common ground in general and during this time raised a further request for a specific meeting with the local highways officers to discuss the detail of the matters set out in REP1-049.70. As at Deadline 3 that meeting has not taken place and it has not therefore been possible to finalise the updates to the Outline Highways Access Management Plan for Deadline 3. The Applicant intends to discuss these matters in further detail before finalising any changes to the Outline Highways Access Management Plan and hopes to be in a position to submit an update of that document at Deadline 4.

Reference	Question to	ExQ1	Applicant's response
Q1.22.5	The Applicant	**Assessment** The Councils' LIR [REP1-049] referred to two committed developments (46/2021/0159 PF and 40/2021/0825 PF) which have been omitted from the Transport Assessment. Can you provide reasoning for their omission?	The Applicant confirms that both of these developments have been included as part of the assessments contained within Volume 3, Chapter 8: Traffic and transport [Document Reference APP-071]. 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 contained within Volume 3, Chapter 8: Traffic and Transport [Document Reference APP-071]. The Applicant notes there is a typographical error in Table 8.14: Committed developments of Volume 3, Chapter 8: Traffic and transport [Document Reference APP-071] 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 issued errata sheet F03 at Deadline 2 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 the baseline flows reported in Volume 7, Annex 8.2: Base Traffic Flows [Document Reference APP-172]. The traffic generation from any 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).

Reference	Question to	ExQ1	Applicant's response
Q1.22.6	The Applicant	**Construction Port** Can you provide an update on the port of origin for any deliveries to the substation or for the offshore works? If a port has now been identified, do any changes to the Transport Assessment or OCTMP need to be made?	The Applicant has not yet selected the port, or ports, that will be used during construction for either the marshalling and preparation/construction of offshore components, or for the delivery of any onshore components. The Applicant therefore does not propose to make any changes to the OCTMP in this regard.

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