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MONA OFFSHORE WIND PROJECT

Hearing Summary (ISH3) Environmental Matters

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Image of an offshore wind farm

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1	**Welcome, introduction, arrangements for the hearing**	
2	**Purpose of the Issue Specific Hearing**	
3	**The Application**	(1) In relation to its approach to errata, the Applicant confirmed it is aware that some errors in the application documentation have come to light and that it has sought to identify and address these as quickly as possible so that there is no prejudice to parties participating in examination. The Applicant confirmed that, having reviewed the errors identified, these do not result in a change to the conclusions arrived at in the Environmental Statement. The Applicant submitted that it has sought to deal with errata in a way that is easy to understand, although the Applicant recognises this aim may not have been achieved. The Applicant agreed to review its approach to errata, whilst seeking to reduce the volume of documentation produced. [**Post Hearing Note**: the Applicant updated the ExA at ISH4 and proposed to reformat its approach to errata to be on a document rather than deadline basis. The Applicant confirmed that going forward it would only include any errata that have not been addressed in updated documents. If necessary the Applicant will maintain an errata sheet to be appended within the relevant Environmental Statement chapter where there are less than 10 errors. Where there are more than 10 errors, the Applicant agreed to incorporate errata amends within the chapter. The Applicant agreed to take a proportionate approach going forward to ensure certified documents are accurate and easy to read]. (2) In relation to the application of National Policy Statement (NPS) EN-1 policies on critical national priority (CNP) infrastructure, the Applicant confirmed that it has applied the mitigation hierarchy to the proposed development. The Applicant submitted that it has undertaken a robust assessment of the likely significant effects of the proposed development under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and that mitigation has been applied to seek to reduce residual effects of the proposed development where necessary in accordance with the mitigation hierarchy. The Applicant has then applied CNP infrastructure policies in NPS

		EN-1 and concludes that in all cases the residual impacts do not affect the presumption in favour of consenting Mona as CNP infrastructure.
4	**The Onshore Substation**	
a	Alternatives including clarification on the choice of onshore substation location	(3) The Applicant set the legislative and policy context in which the alternative locations for the onshore substation are considered. The Applicant cited paragraph 4.3.9 of NPS EN-1 as follows: • *"as in any planning case, the relevance or otherwise to the decision making process of the existence (or alleged existence) of alternatives to the proposed development is, in the first instance, a matter of law. This NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective. Although there are specific requirements in relation to compulsory acquisition and habitats sites, the NPS does not change requirements in relation to compulsory acquisition and habitats sites.*". (4) The Applicant then cited paragraph 4.9.13 of NPS EN-1 as follows: • *"to help the Secretary of State consider thoroughly the potential effects of a proposed project in cases where the EIA Regulations do not apply and an ES is not therefore required, the applicant should instead provide information proportionate to the scale of the project on the likely significant environmental, social, and economic effects.".* (5) The Applicant then went on to cite the Infrastructure Planning (Environmental Impact Assessment) Regulations ("the Regulations"), Regulation 14(2)(d) of which requires the environmental statement in an application for a development consent order to include: • *"a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment".* (6) The Applicant confirmed that this wording is mirrored in Schedule 4, paragraph 2 of the Regulations as follows: • *"A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of*

the main reasons for selecting the chosen option, including a comparison of the environmental effects."

(7) The Applicant confirmed that this is the framework within which it has undertaken a consideration of alternatives.

(8) The Applicant submitted that it has undertaken a robust site selection process which has followed recognised processes and has fully considered alternatives of choice of location for various infrastructure elements of the Authorised Project. The Applicant explained that it presented the project design to the Design Commission for Wales (DCfW) during a pre-application design review who confirmed that the Applicant's site selection process was comprehensive and thorough. The Applicant confirmed that the site selection process was designed to seek feedback from key stakeholders, landowners and the public (including tenants) through non-statutory and statutory consultation prior to key decision points, in particular the identification of the preferred substation zone and the final choice of location within that zone. The Applicant submitted that feedback from consultees to date has been limited but that the Applicant welcomes the meeting set for 21 October 2024 with the landowners at the onshore substation. [Post-Hearing Note: the landowner has confirmed that the meeting will now be held on 11 November 2024].

(9) The Applicant confirmed that the National Grid identified Bodelwyddan as the point of interconnection through the Holistic Network Design (HND) process in 2022, and as a result only this National Grid substation was considered as part of the detailed site selection process. The Applicant outlined that it took a high level approach to identification and assessment of land parcels, dividing the search area into zones, identifying preferred zones and then identifying land parcels within each preferred zone. The Applicant then undertook a black, red, amber, green (BRAG) assessment of each of the land parcels in the preferred zones prior to consultation (AS-16). The Applicant indicated that it followed these guiding principles for substation site selection (as further set of in Table 4.16 of AS-016):

- Seeking an economic and efficient grid connection (siting the substation as close as possible to the National Grid Connection Point);
- Following the Horlock Rules adopted by National Grid Electricity Transmission (2003) (summarised in Table 4.6 of AS-016);
- Avoiding key sensitive features where possible and, where not possible, ensuring impacts can be mitigated;

- Minimising the disruption to (and therefore the impact on) populated areas; and
- Accommodating the range of technology solutions sought within the design envelope.

(10) The Applicant confirmed that the area of search was undertaken using the following parameters (as defined in Table 1.1 of APP-081):

- A footprint of up to 125,000m2 for the indicative onshore substation footprint (with an onshore substation building footprint within this of 105,000m2);
- Structures being up to 20m tall; and
- The onshore substation requiring land for temporary construction works (e.g. welfare, parking, storage areas and associated temporary access tracks) and a temporary construction compound footprint of up to 250,000m2.

(11) The Applicant confirmed that an initial area of search 5km from the Bodelwyddan point of connection was identified, which is larger than most other offshore wind projects. The Applicant confirmed that its engineers were able to widen the maximum electrical distance for the 400kV cable between the onshore substation and National Grid Bodelwyddan substation. The Applicant confirmed that the search area could not be widened any further as to do so would result in electrical losses impacting on the generation transfer to the National Grid substation.

(12) The Applicant confirmed that the 5km search area was divided into 5 zones based on hard constraints, such as areas of infrastructure, landfill, roads and railways. The Applicant submitted that this division of the search area into 5 zones included a reasonable number of alternatives to consider, given many would inevitably be ruled out by constraints within each defined zone. The Applicant further submitted that identification of every single land parcel within the 5km search area would not be feasible, as that would result in assessment of over 100 substation locations. The Applicant confirmed that following a BRAG assessment of all 5 zones, 4 zones were discounted and zone 5 was selected for retention as set out in further detail in the Site Selection and Consideration of Alternatives Chapter (AS-016) and Annex 5.2 Selection and Refinement of the Onshore Infrastructure (APP-085).

(13) The Applicant continued that within zone 5, 17 options were identified for the onshore substation using the BRAG assessment method and were assessed from the experience of the Applicant and technical expertise of relevant specialist consultants

supporting the process. The Applicant confirmed that out of all 17 options, 7 options were removed due to a variety of factors. Options 9, 10 and 11 were removed due to an outline planning application over the land. Option 12 was removed due to an overlap with land used for the Awel y Mor Offshore Wind Project, and options 13 and 14 were removed due to steep gradients causing construction feasibility issues. Option 15 was removed as it was similar to option 16, but had potentially greater landscape and visual impacts as is located in a more rural setting. The Applicant continued that 10 options were then taken forward as part of the medium list of options, at which point the Applicant engaged formerly with the site selection Expert Working Group (EWG) which included Cadw, CPAT, NRW, the North and Mid Wales Trunk Road Agency and the Clwyd-Powys Archaeological Trust. The Applicant added that the local authorities were invited to the site selection EWG but were unable to attend.

(14) The Applicant confirmed that option 8 was removed primarily because of proximity to residential properties with no potential for mitigation due to topography and overlap with Awel y Mor Offshore Wind Project cables. The Applicant confirmed that options 16 and 17 were discounted due to access constraints meaning this option was not feasible because of the quality of the road and topography.

(15) The Applicant then confirmed that 7 options were taken forward to the short list which formed the basis of targeted consultation in Autumn 2022 (as set out in the Consultation Report (APP-037)). The Applicant confirmed that within this targeted non-statutory consultation (which ran from 26 September to 7 November 2022), 2 events were held at Bodelwyddan Village Hall and an online webinar was held to go through the same information for those who could not attend in person. The Applicant continued that the information consulted upon was published online on 26 September 2022, receiving a total of 36 pieces of feedback in writing, comments being primarily from NRW and members of the community. The Applicant confirmed that 5 options were then removed due to overlap with the proposed St Asaph Solar Farm footprint and distance from the National Grid Bodelwyddan substation, topography of the site, steep gradients and landscape and visual effects. By process of elimination, the Applicant confirmed that it settled on 2 options (option 2 and option 7) which were included in the Preliminary Environmental Impact Report (PEIR) as part of statutory consultation held in spring/summer 2023. The Applicant confirmed that it included 2 options in the PEIR because it had not had sufficient engagement from local authorities and wanted to secure this feedback as well as ensuring local views were considered. Following commentary at PEIR, the Applicant confirmed that it included a reduction in physical footprint of the substation in its application due to comments from Denbighshire County Council (DCC) through a commitment to use gas insulated switch gear (GIS) technology. The Applicant confirmed that it reduced the substation footprint

from 125,000m2 to 65,000m3, the maximum building height from 20m to 15m and the land temporarily required for construction from 250,000m2 to 150,000m2.

(16) The Applicant confirmed that both options 2 and 7 were put through another BRAG assessment as set out in table 1.4 of the Site Selection and Alternatives Chapter (AS-016). The Applicant confirmed that the statutory consultation feedback received on the onshore substation options was limited, and the majority of responses received generally objected to the size of the onshore infrastructure. The Applicant confirmed that NRW provided a strong indication that its preference was to for option 2 as this option was less visible from the Clwydian Range and Dee Valley National Landscape and option 7 required realignment of the tributary of the River Elwy which NRW did not support. The Applicant confirmed that option 7 was then discounted, primarily driven by the construction feasibility, limited construction footprint, lesser landscape and visual impacts and lesser ecological impacts associated with option 2 as set out in further detail in Figure 1.6 of AS-016. The Applicant confirmed that the decision to go forward with option 2 was presented to the Site Selection EWG and announced through a newsletter and online publication in August 2023.

(17) The Applicant confirmed that following further electrical onshore substation design, the location and orientation of the onshore substation was micro-sited to take account of specific features and constraints surrounding it. The Applicant confirmed that this location and orientation differs slightly to that proposed during the site selection process for PEIR. The Applicant confirmed that it updated the location and orientation of the onshore substation to place it as far away from residential receptors as practicable, whilst maintaining appropriate distances from the Ancient Woodland to the north (as well as avoiding the National Grid overhead lines). The Applicant confirmed that the temporary construction compound was similarly located, to the north / northeast of the onshore substation site, to place it as far as practicable from residential receptors whilst also utilising the available screening of the woodland to the north to screen works from the Glascoed Road. The Applicant confirmed that it followed the siting principles as set out in the Design Principles document (APP-189):

- Avoid key sensitive features where possible;
- Minimise disruption to populated areas;
- Reduce encroachment into high value agricultural land where possible;
- Maximise distance to residential receptors;
- Minimise direct and indirect effects on onshore ecology;
- Minimise direct and indirect effects on cultural heritage;
- Minimise noise levels at nearby receptors; and

- Minimise landscape impacts and utilise existing screening.

(18) The Applicant confirmed that the Design Principles (APP-189) will inform detailed design, and is secured by Requirement 6 of the draft Development Consent Order (DCO).

(19) The Applicant confirmed that it has undertaken an internal retrospective assessment of whether reduction to a 65,000m2 substation footprint would change the conclusions of the site selection process. The Applicant confirmed that if the original assessment was undertaken on the basis of a 65,000m2 substation footprint, additional sites may have been brought into the consideration of alternatives assessment that were not available under the 125,000m2 footprint. Despite this, an assessment undertaken on the basis of the reduced substation footprint would not have changed the conclusions of the BRAG assessments undertaken, which are primarily driven by the hard constraints which defined the 5 initial search zones as mentioned above. The Applicant confirmed that, whilst an assessment based on the reduced substation footprint may have increased some space and capacity for mitigation, where an option was identified as black under the BRAG assessment, this finding would not change due to the reduction in substation footprint. The Applicant agreed to submit a note to confirm the status of its internal review [**post hearing note**: which will be submitted at Deadline 5].

(20) The Applicant confirmed that, although it is aware of the continuing obligation to review site selection decisions, at this stage in the process there would only be an obligation for the Applicant to undertake a new assessment for an obvious site that had come forward that had been discounted or missed but that should have been assessed previously. The Applicant submitted that no party has presented an alternative site outside of those already considered by the Applicant that should have been considered.

(21) The Applicant confirmed that zone 2 was primarily discounted because it would require the Applicant to cut across the River Clwyd (and potentially the River Elwy also) and would have required the Applicant to double back and take the onshore cable route significantly further than the chosen option to connect to the Bodelwyddan National Grid substation, therefore not aligning with the Applicant's onshore cable route site selection principles.

(22) In relation to Table 4.21 of AS-016, the Applicant confirmed that the wording in the first row of the table, *"Rates low on negative aspects identified by the majority of residents"*, is wording used by respondees which the Applicant was reluctant to change to ensure respondees' views are represented accurately. [**Post hearing note**: the

Applicant has reviewed the context of this wording in Table 4.21 of AS-016 and has provided a response in HAP_ISH3_04].

(23) In reference to Figure 4.17 of AS-016, the Applicant confirmed that option 1 would be a similar or closer distance to existing residential properties. The Applicant confirmed that option 1 has properties immediately to the east and west, as well as St Asaph Solar Farm proposal overlapping and surrounding it. The Applicant confirmed that the landowner of this area asked the Applicant not to site its onshore substation on top of the proposed St Asaph Solar Farm proposal. The Applicant confirmed that its distance from the National Grid substation was not the sole reason for discounting option 1 in the site selection process, but that the aforementioned landowner preference was also taken into account as the primary reason.

(24) In relation to option 5 in Table 4.21 of AS-016, the Applicant confirmed that the comments received were from residents to the north of this site which would be overlooking this option. The Applicant confirmed that discounting option 5 was twofold: (1) its distance from Glascoed Road, which is the main nearby highway connection, and (2) its location on one side of the valley, meaning there would be clear views of this option from the other side of the valley, creating a large zone of theoretical visibility.

(25) In relation to the final choice made between options 2 and 7, the Applicant confirmed that the construction feasibility was constrained for option 7 due to the necessity to realign a watercourse and constraints on access. The Applicant confirmed that the road south from St Asaph to option 7 would not be suitable for heavy goods vehicles (HGVs) (as the existing track involves a 90 degree turn) unless coming from St Asaph. The Applicant clarified that it had made a commitment not to take traffic through St Asaph, which meant it would need to build out a new access track to make option 7 feasible. The Applicant continued that a new access track would likely come from the Bodelwyddan National Grid access point and head east towards option 7 (as mapped out in more detail in Figure 1.6 of AS-016). The Applicant concluded that, alongside these environmental considerations, increased visibility, views of local residents and general construction feasibility, option 7 compared less favourably to option 2, which was taken forward as the onshore substation site.

(26) In relation to the possibility of co-location of the onshore substation with existing infrastructure, the Applicant submitted that it did consider co-location with existing assets. The Applicant confirmed that option 12 is sited next to the Awel y Mor Offshore Wind Project onshore substation site, but was discounted because there wasn't enough room for both projects in this area. The Applicant added that option 8 was considered, which went over the Awel y Mor Offshore Wind Project cable route, but was ultimately discounted due to visibility issues at this option site. The Applicant

confirmed that did not identify a site immediately adjacent to the Bodelwyddan National Grid substation as there was not sufficient space in this area and it would be on top of the Awel y Mor Offshore Wind Project 400kV cables which would be a significant constraint. Co-location was also considered with Gwynt y Mor and Burbo Bank extension but again, there was not enough room for the Mona onshore substation to fit in areas adjacent to these projects. The Applicant submitted that it tried to co-locate infrastructure as this is preferable from a landscape and visual perspective, and that option 2 achieves this by being as close as possible to the Bodelwyddan National Grid substation and existing overhead pylon lines.

(27) The Applicant confirmed that the DCfW neither supported nor criticised the choice of option 2 as the final onshore substation site. The Applicant confirmed that the DCfW commented that the site selection process undertaken by the Applicant was robust, comprehensive and thorough. The Applicant confirmed that the DCfW focused on design elements of the onshore substation rather than site selection, but was nonetheless content that the Applicant has undertaken the appropriate site selection process. The Applicant confirmed that it has a follow up review with the DCfW in mid-November [**Post hearing note**: The interim design review is scheduled for Thursday 21st November 2024].

(28) The Applicant confirmed that the detail of the layout or arrangement of the temporary construction compounds (TCCs) was not considered at the site selection stage. The Applicant confirmed that in the early stages of site selection and project design, it was more focussed on the location for the onshore substation. The Applicant confirmed that the arrangements of the TCCs is set out in Figure 1.6 of AS-016, but was only considered at that level of detail in order to inform the final choice between options 2 and 7.

(29) In response to submissions made by the Cefn Estate, the Applicant reiterated that it began its non-statutory consultation on 26 September 2022 where 7 sites were presented. The Applicant confirmed that prior to this, it had engaged with the landowner in relation to St Asaph Solar Farm meaning it had presented footprints of the onshore substation options to the Cefn Estate prior to this non-statutory consultation to seek its feedback. The Applicant confirmed that PEIR was released in summer 2023 where it sought feedback from the Cefn Estate. The Applicant confirmed that it has repeatedly tried to engage and seek feedback from the Cefn Estate since and has records of its correspondence with the Cefn Estate. The Applicant disagrees with the Cefn Estate's comment that information in relation to the layout, scale and size of the infrastructure for the onshore substation was not available until 31 January 2024.

		(30) In response to a question from Cefn Meiriadog Community Council (CCC), the Applicant confirmed that options 16 and 17 were described as being in a more settled, rural landscape than option 2 as chosen because the latter could be co-located with existing infrastructure, being in proximity to the Bodelwyddan National Grid Substation, Gwynt y Môr substation, overhead lines and Burbo Bank Extension substation would not constitute a settled rural landscape.
b	The implementation of the Code of Construction Practice [REP2-038] and associated management plans	(31) The Applicant confirmed that the Code of Construction Practice (REP2-038) (CoCP) is secured by Requirement 9 of the draft DCO, paragraph 1 of which says that: • *"No stage of the onshore works may commence until for that stage a code of construction practice has been submitted to and approved by the relevant planning authority following consultation with NRW and the relevant highways authority as appropriate."* (32) The Applicant referred to requirement 4 of the draft DCO which prevents commencement of the onshore works prior to notification being submitted to the relevant local planning authority (LPA) (which in this case would be both DCC and Conwy County Borough Council (CCBC)) detailing whether the onshore works will be carried out in a single stage or in two or more stages. The Applicant submitted there is not expected be one CoCP that covers all of the onshore construction work (including landfall, cabling and the onshore substation). The Applicant submitted that it is unlikely that the onshore works will be carried out in a single stage, and if this is the case a CoCP will be submitted for each stage prior to commencement of each stage of construction. The Applicant continued that details of the stages under paragraph 2 of requirement 4 have to be submitted to and approved by LPA prior to commencement of the onshore works. (33) The Applicant submitted that the onshore works around the substation are likely to take place in a single stage, with a CoCP for this stage submitted to DCC (as the onshore substation lies within this LPA boundary). The Applicant submitted that the plans set out in paragraph 2 of Requirement 9 would practically operate to require a separate CoCP to be submitted for each stage. For the onshore substation, the plans required in paragraph 2 of Requirement 9 would be submitted as part of this CoCP as they are relevant. For example, the landfall construction method statement would not be included as part of the CoCP for the substation, nor would the public rights of way (PROW) management plan as there are no PROW around the onshore substation. The Applicant confirmed that the relevant plan would be submitted to the LPA and in consultation with NRW and the Highways Authority as applicable in advance of the relevant stage of onshore works commencing. The Applicant confirmed that it would engage with the LPA and other relevant bodies as applicable in respect of each plan

		when the formal CoCP is submitted so that they have a sufficient period to review and approve the relevant plan. (34) The Applicant submitted that the plans listed in paragraph 2 of Requirement 9 are meant to be appendices to the CoCP, but agreed to review the wording of Requirement 9 and outline CoCP to ensure that the plans listed in paragraph 2 are adequately secured. The Applicant also agreed to review the outline CoCP to ensure the document is consistent throughout, paying particular attention to sections 1.8-1.10. (35) The Applicant confirmed that it is making progress with DCC and CCBC on the statement of common ground (SOCG) and is seeking engagement from both councils on a topic by topic basis, in line with the appendices to the CoCP set out in paragraph 2 of Requirement 9. The Applicant confirmed that it hopes to provide an update on this progress by Deadline 5.
c	The effects, including cumulative effects, of the proposed Onshore Substation site during construction and operation, including: • Visual effects	(36) In relation to the visual effects of the onshore substation on users of Denbighshire Crematorium, the Applicant confirmed that it has agreed to provide an annotated set of photographs to DCC and CCBC taken from Denbighshire Crematorium. The Applicant confirmed that it took three pictures from Denbighshire Crematorium: (1) one from the entrance to Denbighshire Crematorium, (2) one from the Memorial Park and (3) one from the closest corner of Denbighshire Crematorium looking towards the onshore substation. The Applicant clarified that these annotated photographs would not be photomontages. The Applicant confirmed that these photographs demonstrate that there is a considerable amount of planting around and within the Memorial Park and Denbighshire Crematorium intervening between the views of the onshore substation. The Applicant confirmed that viewpoint 4 as set out in Chapter 6 of the Environmental Statement (APP-069) is a high sensitivity receptor close to Memorial Park. The Applicant confirmed that the significance of effects of this viewpoint would be minor to moderate adverse in winter year 1, which were not identified as significant due to the topography and existing vegetation of trees and hedgerows. The Applicant submitted that this intervening vegetation creates a layered effect thus reducing impacts. The Applicant agreed to submit these annotated photographs by Deadline 4 [**post hearing note**: these have been submitted at Deadline 4 under document D_D4_13]. (37) In relation to identification of significant effects and the Applicant's methodology applied for effects on the Clwydian Range and Dee Valley (CRDV) National Landscape, the Applicant submitted that it has agreed with DCC and CCBC to use the overarching methodology of the Guidelines for Landscape and Visual Impact Assessment, Third Edition from the Landscape Institute and Institute of Environmental Management and Assessment (GLVIA 3). The Applicant submitted that GLVIA 3 does

not specify definitions for a moderate effect, but allows discretion in application of the methodology as long as its application is transparent. The Applicant submitted that under its assessment it identified the view from Offa's Dyke Path as a very high sensitivity receptor as this is a National Trail going through a National Landscape. The Applicant continued that it nonetheless identified the magnitude as low because of the distance from the path to the onshore substation, meaning the onshore substation is barely visible from the path or anywhere else on the Clwydian Range and Dee Valley National Landscape. The Applicant confirmed that it also provided cumulative photomontages from this location at AS-027, including a GIS version of the Awel y Môr Offshore Wind Project onshore substation and National Grid substation extension, which did not increase the significance of effects. The Applicant continued that the visual effects from viewpoint 11 at Chapter 6 of the Environmental Statement (APP-069) are so distant that the Applicant had to annotate the photomontages to identify the substation infrastructure.

(38) The Applicant confirmed that it has agreed with CCBC and DCC through the SOCG process that the Councils will provide a list of conclusions of moderate significance in Chapter 6 of the Environmental Statement (APP-069) and the Applicant would provide additional context as to why these moderate findings did not result in findings of significant effects by Deadline 5.

(39) In relation to Mr and Mrs Hussey's question in relation to platform height at the onshore substation, the Applicant confirmed that the platform height at current ground level varies depending on the existing topography. The Applicant confirmed that at the lowest point the height of the substation is 46 AOD, and at the highest point is approximately 57m AOD, which was the height used for the photomontages for the Applicant's landscape and visual assessment. The Applicant confirmed that cut and fill will be used at the onshore substation to level out the surface, but that the building height is estimated to be 15m AOD from platform level. The Applicant clarified that it has assessed height based on AOD as this is more accurate than assessing height above current ground level. The Applicant confirmed that its assessment has been undertaken on a worst-case scenario basis. The Applicant agreed to produce a profile of the predicted height of the onshore substation above ground level to be submitted at Deadline 5.

(40) The Applicant confirmed that the 12 lightning masts have been included as part of the application on a worst-case scenario basis. The Applicant submitted that the masts need to be included in the maximum design scenario as part of the Rochdale envelope approach, but that the Applicant may be able to include a different design scenario in detailed design that would have a lesser landscape and visual impact than the worst-case scenario identified in the Applicant's assessment. The Applicant confirmed that it

		updated its photomontages for winter Year 15 in REP3-071 and did not identify a change to the significance of effects already identified in Chapter 6 of the Environmental Statement (APP-069). The Applicant confirmed that the maximum number (12) and height (30m) of the lightning masts is secured in Requirement 6 of the draft DCO. [**Post hearing note:** The lightning masts are also shown on the onshore cumulative photomontages of representative viewpoints VP2 and VP3 also submitted at Deadline 3 (REP3-047 and REP3-048)]. (41) The Applicant confirmed that it has not undertaken a full visual assessment of individual properties within the Cefn Estate, Tan-y-Bryn and Tan-y-Bryn-Uchaf because these are private properties and the Applicant has not undertaken visualisations from private views. The Applicant confirmed that it does not intend to consider the landscape and visual impacts from individual properties as part of its assessment. [**Post hearing Note:** Tan-y-Bryn was considered at a high level, as one of the closest properties to the Mona Onshore Substation, at paragraph 6.5.7.5 of Volume 3, chapter 6: Landscape and visual resources of the Environmental Statement (APP-069). In relation to views from Saint Mary's Church, onshore representative viewpoint 14 as set out at paragraph 6.11.2.152 *et seq* in (APP-069) is close to Saint Mary's Church and this viewpoint will indicate the view from such. The visualisation from onshore representative viewpoint 14 is in Volume 7, Annex 6.5: Landscape visualisations Part 2, of the Environmental Statement (APP-158).] (42) In relation to deer management, the Applicant confirmed that it is aware of the deer population within the Cefn Estate and the need to manage this population. The Applicant confirmed that the outline LEMP identifies that all sites identified for natural colonisation that will be used will be protected using deer fencing. The Applicant confirmed that it has been seeking to meet with the Cefn Estate to discuss these issues, a meeting was arranged for 21 October 2024, but the Cefn Estate has had to postpone this meeting. The Applicant confirmed that another meeting has been arranged for November, but emphasised that it is keen to meet with the Cefn Estate to discuss outstanding issues as soon as it can. [**Post hearing note**: the landowner has confirmed that the meeting will now be held on 11 November 2024.] (43) In relation to the Cefn Estate's concern raised about water and drainage, the Applicant submitted that it is not aware of any private water supply on Cefn Estate that its residents use as drinking water. The Applicant confirmed that drainage is very important consideration to the Applicant in relation to design of the onshore substation, and confirmed that there will be a drainage plan produced in line with the outline Operation Drainage Management Plan (APP-231) which will identify drainage at the

	onshore substation. The Applicant confirmed that it would like to discuss these issues with the Cefn Estate as soon as it can through an in-person meeting. (44) In relation to the cumulative photos taken from viewpoint 3, these were taken looking towards the substation and were taken from an angle which allows the viewer to see all proposed developments to consider the cumulative landscape and visual impacts from this viewpoint. The Applicant asked parties to identify any specific viewpoints which are of concern, which the Applicant can respond to in written submissions.
• Landscaping	(45) The Applicant confirmed that it discussed in its Statement of Common Ground meeting with DCC and CBCC's landscape representative on Friday 11th October the possibility of further landscaping mitigation works within the Order Limits, but because the exact location of the cable routes is unknown as they are subject to detailed design, it is not possible to commit to a specific location for any mitigation works. The Applicant confirmed that once detailed design has been undertaken and the cable routes are known, consideration will be given to the provision of additional landscaping mitigation works within the Order Limits. (46) The Applicant confirmed that the outline Landscape and Ecology Management Plan (REP2-034) (LEMP) is an outline at this stage as are the Applicant's proposed landscape mitigation measures. The Applicant confirmed that these measures are subject to detailed design once the location of the various elements of infrastructure at the onshore substation are set. The Applicant submitted that the outline LEMP is drafted based on a worst-case scenario in terms of infrastructure design and location, meaning that it may be possible to identify further landscaping opportunities once infrastructure locations are set. The Applicant confirmed that it is agreed and understood with DCC and CCBC in the SOCG that the Applicant's approach to landscaping is appropriate, albeit that the councils' view is that there will be a significant landscape and visual impact at some viewpoints at Year 15 (as set out in Chapter 6 of the Environmental Statement (APP-069)), which is contrary to the Applicant's assessment. (47) The Applicant submitted that landscaping has been proposed as part of the outline LEMP to reduce the landscape and visual effects at the onshore substation from significant to not significant. The Applicant submitted that hedgerow improvements are being submitted as part of the application, no footpaths are being severed permanently and temporary footpath diversions will only take place during construction. The Applicant submitted that there are no permanent landscape and visual impacts at the onshore substation. The Applicant submitted that the agreement under section 106 of the Town and Country Planning Act 1990 entered into for the Awel y Mor Offshore

Wind Project, as mentioned by CCBC and DCC, relates to seascape effects as opposed to landscape effects.

(48) The Applicant confirmed that the mitigation planting proposed as part of the Design Principles document (REP2-026) would include a mix of species: (a) nurse species which would achieve faster growth and a greater height in a shorter period of time and (b) native species (primarily oak) which will take longer to grow. The Applicant submitted that as a result of this mix, species (a) will provide a greater height in a shorter period of time. The Applicant confirmed that once this species reaches an appropriate height, these will be removed/ thinned out in order to allow species (b) to grow. The Applicant confirmed that this would require a degree of management, which is set out in the outline LEMP. The Applicant submitted that this management as set out in the outline LEMP is to be agreed with NRW and DCC and CCBC as part of the detailed LEMP post-consent prior to any landscaping works being carried out. The Applicant submitted that once detailed design has been undertaken, the appropriate species for landscaping planting can be identified and approved as part of the detailed LEMP.

(49) The Applicant submitted that Requirement 8 of the draft DCO requires landscaping works to be carried out in accordance with the landscaping plans. The Applicant confirmed that paragraph 2 of Requirement 8 states:

- *"Any tree or shrub planted as part of an approved landscaping scheme that, within a period of five years after planting, is removed, dies or becomes, in the opinion of the relevant planning authority, seriously damaged or diseased must be replaced in the first available planting season with a specimen of the same species and size as that originally planted unless a different species is otherwise agreed with the relevant planning authority."*

(50) The Applicant confirmed that the 5-year timescale referred to in this Requirement runs from any replanting or replacement in case of damage or disease. The Applicant confirmed that the drafting of this requirement is standard wording and further detail in relation to the maintenance of planting is set out in the outline LEMP and final LEMP once it is drafted. The Applicant submitted that 5 years is a standard duration used for maintenance of landscaping in planning conditions as a maximum, some drafting even including a 3-year maintenance period. The Applicant highlighted that a 5-year maintenance period is specified in the Welsh Government's Circular on the use of Planning Conditions for Development Management dated October 2014 (reference WGC 016/2014). The Applicant submitted that there is nothing to indicate that the landscaping planted would not flourish within 5 years of planting or replanting, and that there are no specific ground conditions or exposed areas within the Order Limits which

	suggest a longer period of monitoring would be required. The Applicant submitted that the ground conditions within the Order Limits where planting would be established is fertile agricultural land with sufficient water supply and at a distance from the sea, meaning there is no justification for a longer maintenance period for planting. (51) The Applicant and DCC and CCBC confirmed that this 5-year period is agreed. In relation to the period of management of the landscaping mitigation and habitat measures, DCC and CCBC submitted that the Applicant needs to commit to deliver appropriate management for landscaping and habitat measures for a 30-year period. In response to this, the Applicant submitted that the precise length of time for management can only be decided when the final LEMP is put forward for approval by DCC and CCBC, as this period will vary depending on the species of planting proposed as well as the precise location of the planting. The Applicant confirmed that if the DCO is granted, the transmission works including the onshore substation and the landscaping mitigation will be transferred to the Offshore Electricity Transmission Owner (OFTO), who will then own the rights in perpetuity. The Applicant agreed to review whether it could commit to a specific management period at this time (for example a period of 15 or 30 years as proposed by CCBC and DCC). The Applicant agreed to keep the ExA updated on its discussions in this regard with CCBC and DCC through the SOCG process during examination.
• Noise and vibration	(52) The Applicant submitted that site clearance activities would not involve rock breaking, and that site clearance is predominantly to do with vegetation. (53) The Applicant submitted that within the outline Construction Noise and Vibration Management Plan (REP2-044) (CNVMP) there is a commitment to work to BS5228:2009+A1:2014 standards in relation to onshore site preparation works. (54) The Applicant confirmed that the distance from Mr Hussey's property to the onshore substation footprint is approximately 190 to 200m. The Applicant confirmed that construction noise is assessed based on noise level throughout the day as opposed to background noise level, averaged throughout the day, evening or nighttime period. The Applicant confirmed that in its assessment the noise levels were recorded as low and were in accordance with what is expected in a rural area. The Applicant confirmed that there was nothing to suggest that the noise levels adjacent to Mr Hussey's property were unusually high, apart from on 18th and 19th September, which the Applicant confirmed was due to rain. The Applicant agreed to provide the exact distance from which construction noise impacts were assessed in relation to Mr Hussey's property. [**Post hearing note**: The Applicant has provided a Construction Noise and Vibration Clarification Note at Deadline 4 (S_D4_14) which explains the distances from

	construction activities to sensitive receptors used in the construction noise model to predict noise levels]. (55) The Applicant confirmed that vibration has not been scoped out of the impact assessment. The Applicant referred to the CNVMP which is secured through the CoCP which applies BS5228. The Applicant confirmed that when detailed design for the substation is prepared, there will be a noise and vibration management plan secured as part of the CoCP which will consider the particular methods used for the purposes of construction and will apply BS5228 standards.
• Working hours	(56) In relation to construction working hours, the Applicant submitted that there is a large amount of work that needs to be done to bring this project forward, and the Applicant is keen to deliver the project as quickly as possible. The Applicant submitted that use of a staggered working profile with other nearby projects would not be possible as it would create practical issues and is too complicated. The Applicant submitted that it requires the option to make use of all working hours available.
• Lighting	(57) The Applicant confirmed that construction task lighting is identified within the maximum design envelope within the landscape and visual impact assessment and covers construction compounds. The Applicant confirmed that the nature of construction task lighting means that the Applicant cannot define exactly which activities will require task lighting and where they will be located. The Applicant confirmed that because of the short-term nature of construction task lighting, it considered that any effects arising from such would be de minimis and would not have the potential to have a significant effect. The Applicant confirmed that it undertook a high-level review of construction lighting and whether it was likely to give rise to significant effects and determined that because it was not the effects of such were not assessed. The Applicant confirmed that as GLVIA 3 requires proportionality and the identification of potential significant effects (GLVIA3, preface, paragraph 1.17), a full assessment of the effects of construction task lighting was not undertaken for that reason. The Applicant agreed to provide its high-level review of construction task lighting effects by Deadline 5 through the SOCG with DCC/CCBC. [**Post hearing note:** The Applicant has provided a lighting clarification note at Deadline 4 (S_D4_12) that collates information from the Environmental Statement and provides details of the high level assessment undertaken for onshore ecology and landscape and visual resources.]
• Traffic and transport	
• Good design	(58) The Applicant referred to paragraph 4.7.2 of NPS EN-1:

- *"Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area."*

(59) The Applicant submitted that this paragraph recognises the technical requirements of projects and that in certain circumstances the ability to apply good design to a particular type of electricity development can be limited. The Applicant submitted that the opportunities for design of the onshore substation will inevitably be engineering led as it has to be a fully functioning substation, built at an economic price. The Applicant submitted that good design needs to be assessed in the context of the engineering requirements surrounding an onshore substation and the elements it requires in order to operate, for example it is not possible to provide landscaping within the substation footprint or include planting or vegetation in close proximity to electricity infrastructure. The Applicant reiterated that the layout of the infrastructure and buildings that make up the onshore substation must be led by engineering and electrical requirements, with good design being applied to these requirements. The Applicant confirmed that it is not in a position where it has free reign over good design, but is constrained by technical feasibility and safety.

(60) The Applicant confirmed that the DCfW has been helpful in pushing for better design and referred to section 3.9 of the Design Principles document (REP2-026) which includes the DCfW request. The Applicant confirmed that it met with the DCfW at the end of Summer 2023 [**post hearing note**: the initial design review took place on 17th August 2023] and has updated the Design Principles document since that meeting. The Applicant referred to paragraph 3.9.1.6 of the Design Principles document which sets out the key aims of the landscaping proposals, including enhancement of the current environment and providing screening and woodland in line with the baseline environment in the area.

(61) In relation to comments made by the Cefn Estate about the potential for use of green roofs, the Applicant submitted that this would be difficult to do safely with a substation given the specific operational safety requirements. The Applicant submitted that green roofs would require a level of maintenance which would likely take the substation and its generation supply offline, which would disrupt functionality and deliverability of supply. The Applicant confirmed that there are certain elements of good design which are possible (such as façade treatment) but there are also elements which are impossible to implement because of operability constraints. The Applicant confirmed that detail of good design options will be included in the final design as well as

	mitigation outside of the substation footprint. The Applicant reiterated that planting cannot be done within the substation footprint, and mitigation planting and screening must be provided outside of this footprint. (62) The Applicant confirmed that it has not had another design review with the DCfW since 17 August 2023 because it thought this would be better done when detailed design was further progressed. The Applicant confirmed that following a written representation (REP3-097) from the DCfW, the Applicant requested a meeting, but that the DCfW expressed that they can only contribute by completing a design review. The Applicant has agreed to have an interim design review meeting with the DCfW mid-November [**post hearing note**: The interim design review is now scheduled for Thursday 21 November]. The Applicant agreed to provide feedback on this meeting to ExA. (63) The Applicant agreed to review the ExA's written question appended to ISH3 Actions List in relation to the desired outcomes for the onshore substation in relation to good design. [**Post hearing note**: The Applicant has responded to the written questions in its response to the Hearing Action Points (S_D4_6) and will provide an update to the Design Principles (REP2-026) at Deadline 5]. (64) In relation to use of gas insulated switch gear, the Applicant confirmed that there are a number of different buildings that will be needed on the substation site including control buildings, compensator buildings, power unit storage, container buildings, workshops as well as the main GIS substation. The Applicant confirmed that there will be a number of pieces of equipment and aspects of the design that will be within the buildings, and there will be other parts that are outside the buildings and infrastructure. The Applicant confirmed that the precise detail of what is in the Rochdale envelope will be put forward as part of detailed design. The Applicant confirmed that its landscape and visual assessment of the onshore substation was undertaken on a maximum design parameters, which is a standard approach taken for environmental impact assessments. The Applicant confirmed that detailed design needs to be approved by the LPA as secured by Requirement 5 of the draft DCO. The Applicant submitted that it has sought insofar as possible to seek engagement on design from third parties through provision of the Design Principles document (REP2-026).
• The accumulation and interrelationship of effects (paragraph 4.3.19 of NPS EN-1)	(65) The Applicant confirmed that it has reviewed Chapter 11 of the Environmental Statement on Inter-related effects (onshore) (APP-074) and confirms that there is a lack of clarity surrounding how humans have been considered in relation to community consideration in this chapter. The Applicant confirmed that it sought to consider both project and lifetime effects (essentially sequential effects). The Applicant submitted that this is partly dealt with in Chapter 4 of the Environmental Statement on Human Health (APP-078), but agreed to provide further clarity on its approach to this

		assessment at Deadline 4. [**Post hearing note**: The Applicant confirms that the assessment in Volume 3, Chapter 11: Inter-related Effects (APP-074) has followed relevant guidance and is submitting a clarification note at Deadline 4 (S_D4_6.1) that explains the approach.]
	• Decommissioning	
5	**Landscape, Seascape and Visual**	
a	Isle of Anglesey (IoA) National Landscape – effects on special qualities, character and purpose for designation	(66) The Applicant submitted that it is important when looking at the impacts on National Landscapes to do so in the context of the policy tests that apply. The Applicant referenced paragraph 5.10.5 of NPS EN-1 in relation to the inevitability of landscape and visual impacts of nationally significant infrastructure projects: • *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation."* (67) The Applicant referenced 5.10.6 of NPS EN-1 in relation to careful design: • *"Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate."* (68) The Applicant referenced paragraph 5.10.8 of NPS EN-1 on the duty to have regard to the purpose of designation of national landscapes: • *"The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. In these locations, projects should be designed sensitively given the various siting, operational, and other relevant constraints. The Secretary of State should be satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development."* (69)The Applicant referenced paragraph 5.10.15 of NPS EN-1 in relation to coastal areas, highlighting that the Applicant is focusing on coastal areas for mitigation opportunities:
b	Clwydian Range and Dee Valley (CRDV) National Landscape – effects on special qualities, character and purpose for designation	

- *"Coastal areas are particularly vulnerable to visual intrusion because of the potential high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coast."*

(70) The Applicant then referenced paragraph 5.10.26 of NPS EN-1 in relation to mitigation:

- *"Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, electricity generation output. There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function."*

(71) In relation to paragraph 5.10.26, the Applicant clarified that reducing the scale of a project can help to mitigate landscape and visual effects, however reducing the scale or amending the design of a project may result in significant operational constraints and reduction in electricity generation output. The Applicant also highlighted that there are only exceptional circumstances where the benefit of mitigation would warrant a reduction in function or output. The Applicant also highlighted the policy requirement in the NPS to maximise the energy yield from energy infrastructure projects [**post hearing note**: NPS EN-3 paragraph 2.8.25] and submitted that there is a balance between using sites efficiently whilst mitigating effects.

(72) The Applicant confirmed that the Mona Array would be visible from the northern section of the Isle of Anglesey National Landscape. The Applicant highlighted that the Isle of Anglesey National Landscape includes most of the coast of Anglesey and it has therefore looked at the impacts of the Mona Array Area on the special qualities of this National Landscape as a whole. The impact is upon a small part of the Isle of Anglesey National Landscape. The Applicant emphasised that the impact of the scheme relates to two special qualities (Expansive Views and Peace and Tranquillity) of the Isle of Anglesey National Landscape, out of a total of 14 special qualities that apply to it. [**Post hearing note**: All fourteen special qualities are considered in Volume 6, Annex 8.5: International and nationally designated landscapes study (APP-105) and the two relevant special qualities taken forward to full assessment. The significance of effects resulting from the presence of the Mona Array Area on both special qualities was judged to be minor to moderate adverse and not significant.]

(73) The Applicant provided context on how the Mona Array Area was chosen and the Order Limits identified. The Applicant referenced figures 4.2 and 4.18 of Volume 1, Chapter 4 of the Environmental Statement on Site Selection and Consideration of Alternatives (AS-016) which show that the initial array area was identified through the Round 4 leasing round issued by the Crown Estate. The Applicant confirmed that the site at this stage was larger than the current Order Limits, with additional space to the East and North which has been removed because of a number of constraints in the area, principally shipping and navigation and cumulative shipping and navigation impacts, which require adequate sea room for safety and navigation between this project and other projects that are proposed nearby, such as the Morecambe Offshore Wind Project and Morgan Offshore Wind Project. The Applicant confirmed other constraints such as wind availability, water depth, ground conditions, constraints on the seabed as well as other sea users and activities were also taken into account and concluded that the current siting of the Mona Array and Order Limits is appropriate and that there is no opportunity to move the site materially further from the Isle of Anglesey National Landscape. The Applicant confirmed that the Order Limits could have been moved further West, which would mean that views from the Isle of Anglesey National Landscape are extended, and would push the Mona Array into deeper water. The Applicant summarised that it has had to balance a multitude of constraints in siting the project and does not see that there is an alternative location to that of the current Order Limits. The Applicant confirmed that the Crown Estate leasing round included areas much closer to the Isle of Anglesey coastline. The Applicant confirmed that in doing so it has sited the Mona Array as far as it realistically can from the Isle of Anglesey National Landscape, taking into account the aforementioned constraints.

(74) The Applicant went into more detail on various other constraints on siting, including the proposed scallop mitigation zone, the layout of the turbines in relation to existing telecoms cables and unknown archaeology from any pre-construction surveys carried out. The Applicant reiterated that there are a number of constraints that limit where the turbines can be sited. The Applicant confirmed that it has layout principles requiring a certain distance of separation of the wind turbines to avoid increase in density of the Mona Array. The Applicant confirmed that if the White 2019 Reports were to be adhered to without taking into account additional constraints or assessment, the site would not have the capacity for a 1500MW project. As such, the Applicant submitted that the NPS EN-1 policy 5.10.26 is not relevant here as a small change cannot be made to the site that would have a marginal loss in function. The Applicant concluded that there is no alternative design for this project that would be possible without a very significant change in the scale and nature of the project.

(75) In relation to the height of the turbines, the Applicant confirmed that it increased the tip height of the largest turbine in the MDS from 324m at PEIR to 364m at DCO

application The Applicant explained that this was as a result of feedback from the supply chain in terms of evolution of the wind turbine market. The Applicant confirmed that as a developer procuring wind turbines for a project, it cannot ask for a specific design or pick turbines from a shelf. The Applicant explained that it has to seek offers from turbine manufacturers, of which there is a limited supply. The Applicant explained that the turbine manufacturers produce one or two models of turbine at a time, rather than an entire back catalogue and that the Applicant cannot select a smaller turbine. The Applicant also submitted that it is required to consider the overall efficiency of the project. The Applicant explained that it is required to deliver an economic and efficient project, and has to reach a strike price with the government which is a competitive auction. The Applicant emphasised that it is one of the UK Government's aims to bring down the overall cost of energy, which means looking at efficient ways to bring a project forward so that there is a competitive market and costs are driven down. The Applicant submitted that larger turbines achieve this aim, and confirmed that this is demonstrated by other offshore wind Development Consent Orders which have similar or even higher tip heights than the proposed development. The Applicant cited North Falls Offshore Wind Farm with a maximum tip height of 397m; Hornsea Four Offshore Wind Farm with a maximum tip height of 370m; West of Orkney Offshore Wind Farm with a maximum tip height of 360m. The Applicant explained that developers take a view, based on conversations with suppliers and their experience of the market and predicted future market conditions, of what risk they are willing to take in determining a project design envelope that is deliverable. The Applicant concluded that different offshore wind projects have different tip heights, but all are quite large and in a lot of cases are over 350m.

(76) The Applicant then went through its assessment approach. The Applicant confirmed that it agreed viewpoints with relevant statutory consultees, providing suggestions but also taking suggestions from consultees. The Applicant confirmed that its study area was defined as a 50 km buffer around the outer boundaries of the Mona Array Area generally, but that the study area was extended to 60 km from the outer boundaries of the Mona Array Area for the assessment of nationally designated landscapes. The Applicant explained that throughout the national landscape the LANDMAP overall evaluation of the Visual and Sensory Aspect Areas [**post hearing note:** which forms part of the value of the landscape, whereby landscape value plus landscape susceptibility are combined to identify the sensitivity of a resource or receptor] varies from outstanding (which will be equivalent to very high) to low within the nationally designated landscapes. The Applicant confirmed that the national landscape falls within the high and very high categories of sensitivity, depending in part upon its LANDMAP evaluation. The Applicant confirmed that Landscape Sensitivity Assessment guidance for Wales (NRW Guidance Note reference no. GN 017, 2023) allows for nationally designated landscapes to have high or very high sensitivity as set

out in its definitions, which accords with the Applicant's characterisation and evaluation. The Applicant confirmed that both internationally and nationally designated landscapes can be judged to have very high sensitivity, and national designated landscapes can also be judged to be high sensitivity receptors. The Applicant referred to the White 2020 Report which supersedes the White 2019 Report and is now incorporated into NPS EN-3 (paragraph 2.8.208). The Applicant also highlighted paragraph 4.47 of the White 2020 Report which states that the value of the Wales Coastal Path varies, as does the sensitivity of the people walk through [**Post hearing note:** these landscapes of different value]. The Applicant confirmed that it took this variability approach into account in the assessment. The Applicant continued that areas within the national landscape will vary in sensitivity, with some areas (such as Yr Wyddfa/Snowdon) that are for example, an iconic image or the Eryri massif, that would be very high in sensitivity. The Applicant gave the example that the Carneddau mountains (within the Eryri massif) have a very high sensitivity, whereas some areas of lower lying land may not. The Applicant concluded that this variation, in part based on LANDMAP evaluation, follows the NRW 2023 guidance. The Applicant referenced Annex 3: Policy Objectives and Actions Theme 1: Conserving and Enhancing Countryside and Coastal Character, Objective 1: Landscape/Seascape - The coastal landscape and seascape are actively conserved and where appropriate enhanced, Policy CCC 1.1 of the Isle of Anglesey Management Plan 2023-2028, which states that *"LANDMAP is used as the process by which the landscape character of the AONB* [Area of Outstanding Natural Beauty] *is valued and assessed."* The Applicant concluded that sensitivity is differentiated, in part, by looking at LANDMAP character. The Applicant concluded that its approach may differ to that of NRW because it has looked at the value of individual areas within national landscapes.

(77) In relation to magnitude, the Applicant submitted that its conclusions are based on siting and design. The Applicant confirmed the Mona Array is within the lowest category of sensitivity as it is within the sea, and is therefore a low to medium category. The Applicant confirmed that it followed the design principles in the White 2020 Report and in the Guidance on the assessment of the impact of offshore wind farms: Seascape and visual impact (DTI, 2005). The Applicant confirmed that the turbines will not be located within designated seascapes and landscapes, and are located within zones with medium/low sensitivity levels. The Applicant continued that the turbines are not close to or middle distance [**post hearing note:** from the coast], and are in seascape sensitivity zones two and five (two being offshore and five being outer offshore), which are [**post hearing note:** assessed in the White 2019 Report as] the lowest sensitivity areas within Welsh territorial waters. The Applicant confirmed that the turbines are not in inshore waters and are not in coastal waters. The Applicant summarised that the Mona Array is as far out to sea as possible given the size of the project, and the

turbines are not in inshore waters [**post hearing note:** 12 nm/22.2 km from the coast] or inner bays and are therefore not at a focus point (where the coast meets the sea).

(78) [**Post hearing note**: The Applicant confirms that the methodology used to assess the significance of effects is outlined in section 5.3.6 of Volume 1, Chapter 5: Environmental Impact Assessment methodology (APP-052). The matrix used to evaluate the significance of effect has been adapted from the Design Manual for Roads and Bridges (DMRB) LA104 (Highways England *et al*., 2020). The DMRB was devised for linear transport schemes but can be applied to any infrastructure project, including offshore wind projects and their associated linear cable routes. The overall significance of an effect is evaluated by considering the magnitude of the impact alongside the sensitivity of the receptor. The categories used in the Mona Environmental Statement matrix follow the DMRB guidance which does not use a 'Very large' category for magnitude of impact. The main adaptation to the matrix in DMRB to the matrix used in the Mona Environmental Statement is the removal of the 'no change' magnitude of impact column. This is because if there is no change, then the impact is scoped out of the Environmental Statement so this column in redundant. In addition, the seascape and visual assessment (Volume 2, Chapter 8: Seascape and visual resources (APP-060)) defines a large magnitude of impact and very high sensitivity of receptor as a substantial significance of effect (vs a major significance of effect in the other assessments in the Mona Environmental Statement), reflecting Landscape Institute Technical Guidance Note 2/19: Residential Visual Amenity (Landscape Institute, 2019), "*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*." (emphasis added)].

(79) In relation to baseline photography, the Applicant confirmed that it has had some difficult getting baseline photography on a clear day. The Applicant submitted that given the turbines are far from shore, it makes any photomontages more difficult to show the turbines. The Applicant confirmed that it has made a number of attempts to effectively capture the horizon point in its baseline photography and agreed to make a further attempt to redo this photography subject to a suitable weather window **[Post hearing note:** The Applicant has undertaken further photography at offshore representative viewpoints 1, 2, 3, 4, 26 and 55 and has produced a second set of visualisations from these VPs at Deadline 4 (S_D4_6.2 and S_D4_6.3)]**.** The Applicant highlighted that the photomontages are only part of a number of materials that the public and ExA have to assess the effects of the proposed development, which includes wirelines. The Applicant submitted that photographs are a useful tool for understanding landscape and visual effects, but are not as good as actually being out in the field to view effects in person, which the ExA has done through an unaccompanied site visit. The Applicant submitted that the assessment of effects need

		to be undertaken through a total consideration of visual materials, fieldwork and wirelines that together show the likely significant landscape, seascape and visual effects of a project. The Applicant submitted that it is on this basis upon which it has undertaken its assessment. (80) The Applicant confirmed that it needs to consider any without prejudice compensation and enhancement position in further detail, given its assessment does not identify significant effects. The Applicant submitted that a nationally significant infrastructure project is not realistically going to conserve and enhance the natural beauty of a designated landscape, as recognised in paragraphs 5.10.26 and 5.10.35 of NPS EN-1 and 2.8.263 of NPS EN-3. The Applicant also reiterated that this development is not actually within the national landscape, but is at some distance from it. [**Post hearing note:** The Mona Array Area is located in offshore and outer offshore seascape sensitivity zones, with the lowest sensitivity levels of all the Welsh territorial waters. Regarding the special qualities of the nationally designated landscapes, based on visibility, the Mona Array Area is not prominent in views from them but is, to differing degrees and in different contexts, visible from parts of them. The majority of locations from which the Mona Array Area is visible have 360° views, of which the Mona Array Area would extend to no more than 10%].
c	Eryri National Park - effects on special qualities, character and purposes for designation	(81) In relation to the cumulative effects on the special qualities of Eryri National Park, the Applicant explained that it has not applied any mitigation for these cumulative effects as it does not consider there to be a trigger or justification for mitigation in this case. The Applicant explained that it did not identify any project alone effects on Eryri National Park and that the cumulative effects identified arise as a result of tier two projects rather than the Mona Offshore Wind Project. (82) The Applicant confirmed that Requirement 3 of the draft DCO secures aviation safety lighting. The Applicant confirmed that paragraph 3 of Requirement requires that lighting installed be operated at the lowest permissible lighting intensity level which will minimise landscape and visual impacts on Eryri National Park. (83) The Applicant confirmed that it has agreed to undertake a more detailed local landscape character assessment as agreed with NRW and has provided this at Deadline 4 (S_D4_57). The Applicant confirmed that its position is nonetheless that this additional assessment is not needed. The Applicant submitted that its position is that a high sensitivity grading is appropriate for a National Landscape, and that its assessment is robust and had appropriately informed design of the project. The Applicant submitted that a more detailed local character assessment would not change the outcomes of its assessment. [**Post hearing note**: The Applicant has provided an assessment of the effects on the local seascape and landscape character areas at

		Deadline 4 as requested by NRW (S_D4_57). The assessment finds that there are no significant effects experienced by these receptors resulting from the development of the Mona Array Area and no effects greater than those on the special qualities of the nationally designated landscapes]. (84) [**Post hearing note**: the Applicant has provided submissions on how the statutory duties under the Countryside Rights of Way Act 2000 and the National Parks and Access to the Countryside Act 1949 have been complied with in Annex 1 of S_D4_6 Response to October Hearing Actions Points).]
d	Assessment of viewpoints for the IoA and CRDV National Landscapes and Eryri National Park	See above
e	Matters raised by NRW concerning the SLVIA methodology	See above
f	Night-time effects on visual receptors	See above
g	Cumulative matters	See above
h	Potential mitigation and/ or compensation	See above
6	**Review of issues and actions arising**	
7	**Any other business**	
8	**Closure of the hearing**	