Partners in UK offshore wind

MONA OFFSHORE WIND PROJECT

Response to Natural Resource Wales ExQ1 Responses

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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	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
AONB	Areas of Outstanding Natural Beauty
CEA	Cumulative Effects Assessment
CRDV	Clwydian Range and Dee Valley
CTVs	Crew Transfer Vessels
DAS	Digital Aerial Surveys
DCO	Development Consent Order
DML	Deemed Marine Licence
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
ENP	Eryri National Park.
EPS	European Protected Species
EWG	Expert Working Group
ExA	Examining Authority
HPAI	Highly Pathogenic Avian Influenza
HRA	Habitat Regulations Assessment
IoA NL	Isle of Anglesey National Landscape
ISAA	Information to support the Appropriate Assessment
JNCC	Joint Nature Conservation Committee
LCMS	Landfall Construction Method Statement
LEMP	Landscape and Ecology Management Plan
LPA	Local Planning Authority
LSE	Likely Significant Effect
MHWS	Mean High Water Springs
MU	Management Unit
NRW(A)	Natural Resources Wales (Advisory)
NRW	Natural Resources Wales
NRW-MLT	Natural Resources Wales – Marine Licensing Team
OLEMP	Offshore Landscape and Ecology Management Plan
OWF	Offshore Wind Farm

Acronym	Description
PEIR	Preliminary Environmental Information Report
PEMP	Project Environmental Management Plan
SAC	Special Area of Conservation
SLVIA	Seascape and Landscape Visual Impact Assessment
SMP	Seabird Monitoring Programme
SNCB	Statutory Nature Conservation Body
SoCG	Statement of Common Ground
SPA	Special Protection Area
UXO	Unexploded Ordnance
VPs	Viewpoints
ZTV	Zone of Theoretical Visibility

Units

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

1 Response to Natural Resource Wales ExQ1 Responses

1.1 Introduction

1.1.1.1 The Applicant has responded to Natural Resource Wales ExQ1 responses below.

2 Response to Natural Resources Wales (NRW) ExQ1 Responses

2.1 General and Cross Topic

Table 2.1: REP3-093 – NRW - General and Cross Topic

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
REP3-093.1	The Applicant NRW (A)	Q1.0.3 **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?	With the exception of Seascape, landscape and visual impact assessment (which has its own SoCG), the matters listed are not matters within NRW's remit, therefore they will not be progressed within the NRW SoCGs or any other SoCG.	The Applicant notes this response.
REP3-093.2	The Applicant DCC, CCBC, NRW(A)	Q1.0.6 **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.	Update on the Transmission Asset Marine Licence Application: The Applicant submitted a Marine Licence application in respect of the Transmission Assets to NRW MLT on the 29 April 2024. The application was validated on the 31 May 2024. NRW MLT consulted with various technical organisations and the public. The consultation ran for 28 days and closed on the 19 August 2024. Following consideration of the consultation responses further information was requested from the Applicant on the 9 September 2024. It is expected that the further information will be provided by the Applicant by the 4 November 2024. The NRW MLT further information request letter has been provided for information. As detailed within Written Representation (REP1-056, section 4.1) NRW MLT, has determined that an Environmental Impact Assessment EIA) is not required in relation to the Marine Licence for the Transmission Assets in reliance on Regulation 10 of the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended). This is on the basis that we are satisfied that an EIA assessment in respect of the project is to be carried out by the Secretary of State and that such assessment will be sufficient to meet the requirements of the EIA Directive. NRW MLT must take into account inter alia the conclusions of the Secretary of State's assessment, any conditions attached to the DCO, and mitigation and monitoring measures. It should be noted that a practical consequence of this is that we would not be in a position to conclude the determination of the Marine Licence application for the Transmission Assets until the DCO has been issued. European Protected Species (EPS) licence (marine): The Applicant has not yet submitted a licence for EPS purposes. We understand that the Applicant will apply for an EPS licence post-consent. EPS licence (terrestrial): The Applicant has not yet submitted a licence for EPS purposes. We understand that the Applicant will apply for an EPS licence post-consent.	The Applicant notes NRW's comments and confirms that any necessary EPS licences will be sought post-consent.

2.2 Commercial Fisheries, Fish and Shellfish

Table 2.2: REP3-093 - NRW - Commercial Fisheries, Fish and Shellfish

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
REP3-093.3	The Applicant NRW(A) JNCC NWWT	Q1.5.3 **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 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.	The Applicant has provided modelled information on operational noise from turbines and vessels on fish within their underwater noise technical report (Volume 5, annex 3.1). Given the recoverable injury and temporary threshold shift (TTS) thresholds for these are either not exceeded, or remain at a relatively small distance (40m or less for vessels, 5m for turbines), with additional caveats due to modelling vs. actual noise effects which further reduces the impact, NRW (A) are not concerned about these potential impacts on fish receptors.	The Applicant acknowledges and welcomes NRW (A)'s agreement that the impacts of underwater sound generated by vessels and operational wind turbines on fish receptors are not of concern and can remain scoped out of the Environmental Impact Assessment presented within Volume 2, Chapter 3: Fish and shellfish ecology (APP-055).

2.3 Draft Development Consent Order (dDCO)

Table 2.3: REP3-093 - NRW - Draft Development Consent Order (dDCO)

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
REP3-093.4	The Applicant	Q1.7.5 **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?	Although this question has not been directed at NRW MLT, we would however advise the ExA to note the following: Marine and Coastal Access Act 2009 Part 4 section 66 sets out marine licensable activities. These include deposit or removal of material or substance using and vehicle or vessel, or construction, alteration and improvement works. Geophysical activities do not normally fall within the definition of marine licensable activities and therefore would appear to be more appropriately controlled under other/ separate regulatory regimes.	The Applicant intends to review the Outline Marine Mammal Mitigation Protocol (APP-207) and the Outline Underwater Sound Management Strategy (APP-202) to ensure there is clarity on what activities should be controlled through these documents and how. Further updates will be provided to these documents, as required, at Deadline 5 to clarify the position. It is the Applicant's intention that only non-intrusive surveys, UXO surveys and UXO clearance can be undertaken as pre-commencement activities offshore. Sound-generating activities will not take place until the final Marine Mammal Mitigation Protocol(s) and Underwater Sound Management Strategy have been approved through the relevant conditions of the deemed and standalone marine licence.

2.4 Habitats Regulations Assessment

Table 2.4: REP3-093 - NRW - Habitats Regulations Assessment

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
REP3-093.5	The Applicant NRW (A) JNCC	Q1.10.2 **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?	At present we note that there is no widely applicable method of directly assessing barrier effects. Barrier effects limit the migration, or free movement of individuals or populations, thus requiring them to divert from their intended path in order to reach their original destination. The impacts to birds from barrier effects are most likely through increased energetic costs flights, usually between breeding colonies and foraging areas, and/or increased time elapsed between provisioning of young. Individuals are less constrained during the non-breeding season, and therefore increases to overall flight costs due to barrier effects while on migration are likely to be very small (Topping & Petersen 2011). Birds on the water and in flight are both included within the displacement assessment presented by the Applicant, as per SNCB advice (SNCBs 2022). Birds experiencing barrier effects are typically in flight, but not necessarily always so, therefore including birds in flight within a displacement assessment is the closest method available. For the Welsh seabird colony SPAs that may be impacted by the Mona proposal (Skomer, Skokholm and the seas off Pembrokeshire / Sgomer, Sgogwm a Moroedd Penfro SPA; Grassholm SPA and Aberdaron Coast and Bardsey Island / Glannau Aberdaron ac Ynys Enlli SPA), for which NRW has responsibility, we do not consider that barrier effects are a significant consideration. This is because the proposed project is not located in a direct path between it and the key foraging areas contained within the marine portion of these SPAs or within other marine SPA foraging areas such as the Irish Sea Front SPA for Manx shearwater. Additionally, we do not consider that the proposal is likely to result in significantly increased energetic costs to individuals travelling from the SPA to foraging areas beyond the proposal. We also note that tracking data (e.g. from Votier et al. 2010) and utilisation distributions (e.g. Wakefield et al. 2013) suggest that gannets have been shown to display spatial segregation between colonies and that it is unlikely that gannets from Grassholm SPA will forage in the Mona area and hence barrier effects to individuals travelling from the SPA to foraging areas will be negligible for this colony. Foraging by both breeding and non-breeding qualifying features of the Liverpool Bay/Bae Lerpwl SPA occur within the SPA and therefore barrier effects due to the operational project array will not occur. With regard to barrier effects for migratory waterbirds travelling to and from non-breeding SPAs on the coast to breeding grounds, we do not consider that the proposal is likely to result in significantly increased energetic costs to individuals travelling additional distance twice a year to navigate around the project. Therefore, based on the above NRW (A) agrees with the Applicant's statement that barrier effects can be screened out of the assessment with respect to Welsh SPAs. We defer advice on other sites (e.g. Scottish, Irish, English etc) to the respective SNCBs.	The Applicant acknowledges and welcomes NRW (A)'s agreement that barrier effects on features of Special Protection Areas (SPAs) are not a significant consideration and therefore can be screened out of assessment within the HRA Stage 1 Screening Report (REP2-012).

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
REP3-093.6	The Applicant NRW (A) JNCC	Q1.10.3 **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. 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?	Benthic: NRW (A) does not 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. Fish: As above - NRW (A) does not 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. Marine Mammals: In view of the wide-ranging populations, and in the absence of known and fixed SAC populations for harbour porpoise and grey seal, the decision whether to conclude that a given impact pathway should be listed as an LSE should be taken at the management unit (MU) / population level. While generally we would agree that there is no potential for an in-combination LSE where the Applicant has excluded an LSE from the project alone; a conclusion of no LSE for the project alone does not rule out that in-combination the pathway may exceed the threshold for an LSE. We consider that there may be a potential for an in-combination contribution to LSE for vessel collision at the MU level. The Applicant should consider this in line with NRW's position statement on mortality limits, and in line with our position statement on the use of Management Units in HRA which recommends carrying out an iterative assessment process. Marine Ornithology: With regard to marine ornithology, at present we consider that there is the potential for an in-combination LSE for Welsh site/feature combinations, however until revised assessments using the SNCB advised approach to displacement (i.e. to consider impacts across the full range of advised % displacement and % mortality rates) are submitted by the Applicant, we are unable to provide advice. We understand that this information is intended to be submitted by the Applicant at Deadline 3. Therefore, we will advise further following full review of the document once it is submitted into the examination. Terrestrial Ecology: There are no terrestrial sites / features of concern, so this question does not apply in this context.	Benthic ecology: The Applicant welcomes the agreement from NRW (A) with respect to in-combination LSE for Annex I habitats. Fish: The Applicant welcomes the agreement from NRW (A) with respect to in-combination LSE for Annex II diadromous fish. Marine mammals: The Applicant maintains that the impacts screened into assessment at the HRA screening stage were discussed and agreed with consultees during the pre-application phase as part of the Steering Group and Expert Working Group (EWG) process (see consultation Table 1.2 in E1.4 HRA Stage 1 Screening Report (REP2-012)) and that HRAs should adopt a proportionate approach to focus only on those impacts where there is considered to be an LSE alone and/or in-combination. Paragraph 1.4.5.49 in the HRA Stage 1 Screening Report (REP2-012) states "*Given the method for site selection applied during this Screening assessment, it is considered that the consolidation of information regarding external plans and projects would not likely result in additional LSEs being identified for the Screening assessment. For marine mammals, the potential for LSE alone is identified for all sites within the respective species MU, therefore effects in-combination will be considered at Appropriate Assessment*". As recommended in the NRW Position statement on Management Units in HRA (NRW, 2022), the Applicant can confirm that it used management units (MUs) for screening of LSE, and also used the larger OSPAR Region III for grey seal in addition. The Applicant confirms it applied the iterative approach, as recommended by NRW, which allows for a more proportionate HRA Stage 2 ISAA (see paragraph 1.7.1.3 in Part Two: Special Areas of Conservation (SACs) Assessments (APP-032)). The Applicant would, however, note that the NRW (A) Position statement on Management Units in HRA does not give specific advice on in-combination assessments, other than use of MMMUs as the relevant spatial scale for screening and inclusions of plans and projects, which is the approach used by the Applicant. The Applicant highlights the methodology proposed for LSE screening was circulated to NRW (A) (and other members of the Steering Group) in July 2022 and no comments were raised. Specifically with regards to collision risk, in the Section 42 responses received from NRW (A) (as detailed in the HRA Stage 1 Screening Report (REP2-012)) NRW stated that they "tentatively agree to the conclusion of no LSE from vessel collision risk in Section 1.4.5.8 Assessment of LSE for Annex II marine mammals, however we advise that the increase in the number of vessels versus the baseline should be quantified". The Applicant presented the requested quantification of the increase in number of vessels alongside seasonal trends based upon volume 6, annex 7.1: Navigational Risk Assessment of the Environmental Statement (APP-098) in paragraph 1.7.3.297 et seq. of Part Two: Special Areas of Conservation (SACs) Assessments (APP-032). This additional information was considered iteratively in the HRA Stage 1 Screening Report (REP2-012) and did not alter the Applicant's decision to screen out collision risk as an LSE. The closest SAC to the Mona Offshore Wind Project, with marine mammal designated features, is the North Anglesey Marine SAC which is located 23.67 km from the Mona Offshore Wind Project and is designated for harbour porpoise. Harbour porpoise have known sensitivity to vessel noise (as discussed in detail in paragraphs

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				4.9.5.32 in Volume 2, Chapter 4: Marine mammals (APP-056)) but are small and highly agile and likely to move away from any vessels at close proximity. Given the distance from this SAC, the likelihood of collisions occurring between vessels and marine mammals is considered to be low. In addition, fast moving vessels (e.g. CTVs) which pose the greater collision risk will be limited in number with a maximum of 12 CTVs potentially being present within the Mona Array Area at any one time during the construction phase and up to a maximum of six CTVs may be present on site at any one time during the operations and maintenance phase. Furthermore, the advice on operations for the North Anglesey Marine SAC (JNCC and NRW and DAERA, 2019a) does not currently identify the pressure of death/injury by collision as a 'high' or significant risk to the harbour porpoise feature of the SAC. In addition, as highlighted in Section 1.2.3 of Applicant's Response to Relevant Representation from Natural Resources Wales (NRW): Interrelated Effects (PDA-010), to some extent the sound from the vessels themselves would deter animals away from vessels and thereby further reducing the risk of injury due to collision. Therefore, the Applicant considers that the risk to designated harbour porpoise at the closest SAC is very low, and following the iterative approach it was therefore concluded that there is no potential for LSE from vessel collision risk across all phases of the Mona Offshore Wind Project. An LSE for collision risk was ruled out for both the project alone and in combination with other plans/projects. The Applicant would highlight that NRW (A) have not raised any potential for a project alone or in-combination LSE from collision risk since the submission of the application or during any post-application engagement during the examination process (see E4.1 Technical Engagement Plan Appendices Part 1 (A to E) (APP-042)) . Furthermore, 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 screening of LSE on European sites for marine mammals (see row NRW.HRA.22, NRW.HRA.23 and JNCC.MM.21, JNCC.MM.23, JNCC.MM.24). Furthermore, as detailed in the SoCG between Mona Offshore Wind Project and NRW (A) (REP1-025) in row NRW.HRA.26 NRW have confirmed agreement that the approach used for determining LSE on European sites with Annex II marine mammals as features is appropriate, and all the relevant sites have been identified. NRW (A) agreed with the list of projects screened into the in-combination assessment (row NRW.HRA.24). NRW also confirmed in row NRW.HRA.29 (in REP1-028) that they 'agree with the overall conclusions of the ISAA in combination with other plans and projects notwithstanding any written representations raised that are currently ongoing points of discussion'. The Applicant therefore considers this to be a change of position from NRW (A). The Applicant acknowledges there is an Offshore EMP which includes Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels (REP3-020) (which requires them to not deliberately approach marine mammals as a minimum and avoid abrupt changes in course or speed should marine mammals approach the vessel to bow-ride) and following known shipping routes, which is

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
				standard practice for OWF projects. The Applicant highlights, as per paragraph 1.4.5.48 in the HRA Stage 1 Screening Report (REP2-012), the "assessments have been made in the absence of mitigation measures". This measure was therefore not relied upon in the HRA Stage 1 Screening Report (REP2-012) when considering LSE effects on identified SAC features. The Offshore EMP will however help to ensure there would be no risk of collision from the Mona Offshore Wind Project. It is expected that other projects would adopt similar commitments and reduce their own contribution to any cumulative/combination effect. The Applicant has reviewed NRW's position on determining Adverse Effect on Site Integrity for marine mammal site features in Wales in relation to potential anthropogenic removals (mortality) from marine developments' (NRW, 2022). The Applicant considers that the risk of mortality of five harbour porpoise (the number of additional marine mammal removals permissible in any year before being unable to rule out AEOSI, according to NRW (2022)) due to collision with vessels to be highly unlikely given there is a high likelihood that marine mammals will avoid vessels well in advance of collision risk and that not all collisions that do occur are lethal (see paragraph 4.9.6.7 in Volume 2, Chapter 4: Marine mammals (APP-056) for detailed accounts of the sensitivity of marine mammal species to vessel collision), notwithstanding that vessels will adhere to the Offshore EMP and Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels (REP3-020) which will further reduce risk to marine mammals from vessel collision. Therefore, the Applicant stands by their position of no potential LSE from collision risk from the project alone or in combination. Marine Ornithology: The Applicant acknowledges the comments from NRW (A) and can confirm that Offshore Ornithology Supporting Information in line with the SNCB Advice (REP3-059) was submitted at Deadline 3. This document provides a full in-combination assessment based on a range-based approach as advised by NRW(A) and the JNCC. Where any potential project alone impact (including at the upper end of the displacement and mortality ranges considered SNCB ranges) equates to more than 0.05% of baseline mortality, the site /feature in question has been taken through to the in-combination assessment. The Offshore Ornithology Supporting Information in line with the SNCB Advice (S_D3_19 F02) has been revised and resubmitted at Deadline 4 following further feedback from the JNCC and NRW after Deadline 3.
REP3-093.7	The Applicant NRW(A)	Q1.10.5 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 harbour porpoise sites are not part of the current assessments as they are cross border sites. Condition Assessments for these sites are not available nor likely to available during the course of examination.	The Applicant notes this response.

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
		• The Maidens SAC • Bristol Channel Approaches/Dynesfeydd Môr Hafren SAC • Lundy SAC • Isles of Scilly Complex SAC		
REP3-093.8	The Applicant NRW(A)	Q1.10.7 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?	Information on Welsh SPAs, including information on current conservation status of site features, can be found by searching for the relevant site name on: https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/find-protected-areas-of-land-and-sea/?lang=en The Site Management Plans include information on the conservation objectives, performance indicators (e.g. population size attribute) for each feature and conservation status and management requirements for each feature. However, we note that these Site Management Plans are considered out of date and note that the Seabird Count (most recent census, 2015-2021) has been completed since and the results are now available. Based on using the best available evidence of the results from the Seabirds Count and the most up to date colony data for the Grassholm gannet colony post the outbreak of Highly Pathogenic Avian Influenza (HPAI), the features of the Welsh SPAs considered in the Mona HRA Stage 2 ISAA SPA report to be in unfavourable condition are: • Skomer, Skokholm and seas off Pembrokeshire SPA: lesser black-backed gull. • Grassholm SPA: gannet, due to the effects of the mass mortality of from HPAI. Information on conservation objectives and favourable condition regarding features of the Liverpool Bay SPA can be found in the site's recent (December 2022) Conservation Advice Package, which can be accessed from: https://publications.naturalengland.org.uk/file/4591112403812352.The red-throated diver feature of this SPA has a restore conservation objective for population distribution and extent and distribution of supporting habitat. In addition, there is a minimise target for disturbance caused by human activity conservation objective for all qualifying features of the site. We note that all Welsh only SPAs will be getting new condition assessments with updated condition by the end of this year (2024), however, this will not be published until March 2025. The current aim is to run assessment in October 2024 at which point NRW (A) may be able to advise the ExA further. No new condition assessments will be made for cross-border SPAs (e.g. those shared with Natural England and/or have elements beyond 12nm and hence are shared with JNCC), such as Liverpool Bay / Bae Lerpwl SPA. Information on sites located outside of Wales should be requested from the respective SNCBs.	The Applicant acknowledges NRW (A)'s comment on the unfavourable condition of lesser black-backed gull at Skomer, Skokholm and seas off Pembrokeshire SPA and northern gannet at Grassholm SPA based on the census of breeding seabirds in Britain and Ireland (2015–2021) (Burnell *et al.,* 2023) and most up to date colony counts. The Applicant notes this is NRW (A) latest assessment and this information is to the best of the Applicant's knowledge not publicly available. The Applicant has used in the application documents the most recent colony count data from The Seabird Monitoring Programme (SMP) online database (https://app.bto.org/seabirds/public/index.jsp) for lesser black-backed gull at Skomer, Skokholm and seas off Pembrokeshire SPA and northern gannet at the Grassholm SPA. The Applicant acknowledges that these colonies have suffered a decline due the outbreak of Highly Pathogenic Avian Influenza (HPAI) with most recent counts of 4,600 lesser black-backed gull recorded nesting in 2024 at the Skomer Island and 38,398 birds in 2024 at the Grassholm SPA. Because these counts were not available at the time of the application, they were not included in the assessment of impacts in the HRA documents. However, as apportioning approach is based on concurrent colony counts and baseline digital aerial survey data, it is not appropriate to use more recent colony counts. Within the HRA, consideration is given to a colony's condition status. As the predicted impact on lesser black-backed gull at Skomer, Skokholm and seas off Pembrokeshire SPA and northern Gannet at the Grassholm SPA was very small (<0.05% increase in baseline mortality), the confirmation of an unfavourable conditions from NRW (A) does not alter the conclusions of the assessment presented in the HRA Stage 1 Screening Report (REP2-012). The Applicant notes that new condition assessments with updated condition will be published for Welsh SPAs in March 2025 and highlights that its HRA assessments have relied upon the latest published condition assessments. The Applicant notes that no new condition assessments will be made for cross-border SPAs (i.e. Liverpool Bay SPA)
REP3-093.9	The Applicant	Q1.10.8 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?	Although directed at the Applicant, NRW (A) consider it pertinent to respond to this question and note our response to Q1.10.7 above.	

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
REP3-093.10	The Applicant	Q1.10.12 **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?	Although directed at the Applicant, NRW (A) consider it pertinent to respond to this question. NRW (A) have previously commented (Section 2.1.2.6 of REP1-056) regarding the need for securing the mitigation measures relied upon to avoid adverse impacts, particularly regarding the red-throated diver and common scoter features of Liverpool Bay SPA. In paragraph 149 of REP1-056 we advised that the timing restriction on cable laying activities within the SPA aspect of the measures/conditions within the EMP needs to also be included within the DCO and committed to and secured in the deemed marine licence in order to minimise disturbance to the key features from this activity. If an Offshore EMP is submitted into the examination by the Applicant as is suggested here by the ExA, which includes the same seasonal restriction, then we may be content that the measure is secure. Although we note that a revision of the DCO would be required to reflect that a finalised Offshore EMP would need to be agreed by the Licencing Authorities, in consultation with the SNCBs. This will require consideration by NRW MLT. In addition, we also note the following: • Currently there is ambiguity between the updated Marine Licence Principles Document [REP2-028/029] and the Measures To Minimise Disturbance To Marine Mammals And Rafting Birds From Transiting Vessels report [APP-203]. The former refers to 'works', while the latter refers to cable installation activities. We note that the reference to 'works' in the latter potentially allows for other activities set out in the definition of 'commence' in Part 1 of the DCO (pre-construction surveys and monitoring, and unexploded ordnance surveys and clearance of unexploded ordnance) to occur within the sensitive period for the SPA. • There is an apparent discrepancy in the timings required of the NRW Marine Licence and the DCO deemed Marine Licence. Marine Licence Principles Document Table 1 page 20 [REP2-028/029] states that the NRW Marine Licence would require the Applicant to submit a Project Environmental Management Plan (PEMP) to NRW at least 6 weeks prior to commencement of the Licenced Activities, but states 'dML condition 18((1)(e) requires submission of an offshore environmental management plan 4 months prior to commencement of the authorised scheme'. We note that this could leave a situation where an Offshore EMP is agreed by MMO, but NRW do not agree with a proposed PEMP. Therefore we suggest that the timescales for submission of these documents are aligned, and ideally achieved in consultation with both Licencing Authorities together.	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 (REP3-020). The Applicant can confirm that the seasonal restriction outlined in the Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels (J17 F02) document (REP3-020) only covers cable installation and is expected to be secured in the standalone NRW marine licence. This measure was suggested by NRW/JNCC/Natural England during the EGW04 and no other activities subject to a seasonal restriction were suggested (see section D.5 of Technical Engagement Plan Appendices Part 1 (A to E) (APP-042). All pre-construction works (i.e. pre-construction surveys and monitoring, and unexploded ordnance surveys and clearance of unexploded ordnance) within the Liverpool Bay/Bae Lerpwl SPA would therefore not be subject to the same seasonal restriction as such as restriction is not needed. The Marine Licence Principles Document (J9 F04) highlights that, based on the Applicant's understanding of NRW MLT's previously granted marine licences, any project environmental management plan would be required to be submitted at least 6 weeks prior to licenced activities commencing. The period which is included in the final standalone marine licence is within NRW MLT's discretion. The Applicant also notes that the drafting is expected to be 'at least' 6 weeks which does not prevent a submission of an Offshore Environmental Management Plan under the deemed and standalone marine licences at the same time.
REP3-093.11	NRW (A) JNCC	Q1.10.14 **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 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]	*note that REP2-012 takes the reader to the wrong document. We have therefore reviewed APP-032 in order to answer the first 3 bullets of this question. <u>Benthic Ecology:</u> NRW (A) are content with the projects included in the in-combination assessments as detailed in the referenced table and figure. <u>Fish:</u> NRW (A) note that Mersey tidal power project has not been included in the in-combination assessment, however it is our understanding that a scoping opinion has not yet been submitted for the project. We are content on the inclusion of the other projects within the in-combination assessment.	<u>Benthic ecology:</u> The Applicant welcomes the agreement from NRW (A) with respect to the projects included in the in-combination assessments for Annex I habitats. <u>Fish:</u> The Applicant welcomes the agreement from NRW (A) with respect to the projects included in the in-combination assessments for Annex II diadromous fish. <u>Marine mammals:</u> The Applicant welcomes the agreement from NRW (A) with respect to the projects included in the in-combination assessments for Annex II marine mammals. <u>Marine Ornithology:</u> The Applicant acknowledges the comments from NRW (A) and confirms that the Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
		• Offshore ornithological features – Table 1.57 and Figure 1.21 of [REP2-010]	Marine Mammals: NRW (A) are satisfied with the projects included in the in-combination assessments. Marine Ornithology: With regard to offshore ornithology, we assume that the ExA are referencing Table 1.63 of REP2-010 (which is the equivalent of Table 1.57 of APP-033, the original submission of this document) 'List of other projects and plans with potential for in-combination effects on offshore ornithology' and Figure 1.12 of REP2-010 'Location of other projects and plans considered for in-combination effects on SPAs and Ramsar sites with offshore ornithological features' not Figure 1.21 which does not exist. We are content with the projects included in the in-combination assessments, as detailed in Table 1.63 of REP2-010 (equivalent to Table 1.57 of APP-033) and Figure 1.12 of REP2-010. However, we note our comments set out in Section 2.1.3.1 and 2.1.4.5 of our Relevant Representations [RR-011] and Sections 2.1.1.3.1 and 2.1.2.5 of our Written Representations [REP1-056] regarding the gaps in data for historic projects in the cumulative and in-combination assessments and the Applicant's approach to in-combination assessments. We understand that the Applicant intends to submit documents at Deadline 3 to address these issues. Therefore, we cannot provide further advice on in-combination assessments until we have fully reviewed the documents to be submitted at Deadline 3.	Technical Note (REP3-044) was submitted at Deadline 3. The Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (REP3-044) concludes that with the addition of indicative numbers for historical offshore wind projects there is no potential for significant effects or for adverse effects on site integrity from the Mona Offshore Wind Project in-combination with other projects and plans. Furthermore, the Applicant has reviewed additional information and conclusions of assessments of projects which have become available since the application for the Mona Offshore Wind Project was submitted. This information is considered in the Review of Offshore Ornithology CEA and In-Combination Assessment (S_D4_9) submitted at Deadline 4.

2.5 Landscape and Visual and Good Design

Table 2.5: REP3-093 - NRW - Landscape and Visual and Good Design

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
REP3-093.12	NRW, DCC, CCBC	Q1.13.5 **Assessment of Effects at locations around the Onshore Substation** Do you agree with the assessment of the sensitivity, magnitude of impacts and significance of effects of the representative VP around the Onshore Substation provided in [APP-069], particularly: • The assessment of magnitude of impact and significance of effects on Representative VP 1, 2, and 3, at Y1 and Y15. • The reduction in the significance of adverse effects at these VPs after the implementation of the mitigations outlined in the Offshore Landscape and Ecology Management Plan OLEMP [REP2-084] and shown in the visualisations. • Whether the mitigations shown in the OLEMP, and in the annotated visualisations included in the Response to Hearing Action Points (S_D1_5.3) [REP1-015], would reduce the operation effects from significant to non-significant for VPs 2 and 3.	Our comments on the application relate to its impact on the purposes of nationally designated landscapes in Wales. As these viewpoints are located outside of a designated landscape, we defer to the LPA on this matter.	The Applicant discussed these points with NRW (A) during a SoCG meeting on 9 October 2024. It was agreed that in relation to the assessment of visual effects around the substation, the SoCG would focus on users of the Offa's Dyke National Trail within the Clwydian Range and Dee Valley (CRDV) National Landscape and people elsewhere within the CRDV National Landscape. Discussions from this meeting have been incorporated into the SoCG and will be reported in the Statement of Commonality at Deadline 5.

2.6 Marine and Coastal Physical Processes and Coastal Change

Table 2.6: REP3-093 - NRW - Marine and Coastal Physical Processes and Coastal Change

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
REP3-093.13	NRW (A)	Q1.14.2. **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.	We consider that subject to NRW (A) being consulted, in writing, on the suitability of the final LCMS where the commitment to trenchless techniques at the intertidal is noted, then we do not require further detail to be provided at this point. We will work with the Applicant to agree the suitability of the relevant plans, as required / appropriate. Should the Applicant wish to provide additional detail now, then we will be content to review accordingly.	The Applicant acknowledges and welcomes the response from NRW (A). NRW (A) will be consulted in respect of the approval of final LCMS as set out in Requirement 9 of the draft Development Consent Order (C1 F05).
REP3-093.14	NRW(A)	Q1.14.3 **OLCMS** Do you consider that the OLCMS [REP2-066] should contain an outline landfall monitoring plan for post construction monitoring?	From a marine perspective, we are not clear what the ExA is specifically asking here and request that further clarity is provided. From a terrestrial perspective, we are content for the OLCMS to contain and OLEMP for post consent monitoring. However, details can also be finalised in the final LEMP. We are content for its inclusion or cross-referencing to the final LEMP.	The Applicant notes this response.
REP3-093.15	The Applicant/ NRW(A)	Q1.14.4 **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 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?	Please see NRW (A)s deadline 3 response, at section 1.4, paragraphs 106-110.	Please see the Applicant's Response to Examining Authority's Written Questions (REP3-062) (Q1.14.4) submitted at Deadline 3 and also the Applicant's Response to NRW's Deadline 3 submission (S_D4_16 (see row REP3-090.109 to REP3-090.112)) submitted at Deadline 4.

2.7 Offshore Biodiversity, Ecology and Natural Environment – Benthic subtidal and intertidal ecology

Table 2.7: REP3-093 - NRW - Offshore Biodiversity, Ecology and Natural Environment – Benthic subtidal and intertidal ecology

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
REP3-093.16	NRW (A) JNCC NWWT	Q1.17.2 **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. ii) 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.	(i) We agree with the information presented in the tables referenced. (ii) We do not consider that there are significant EIA effects – please see our Written representations.	The Applicant welcomes NRW's agreement that there are no significant EIA effects on benthic subtidal and intertidal ecology from the Mona Offshore Wind Project alone.
REP3-093.17	NRW (A) JNCC NWWT	Q1.17.3 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. ii) 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	(i) We agree with the information presented in the tables referenced. (ii) We do not consider that there are significant EIA effects – please see our Written representations.	The Applicant welcomes NRW's agreement that there are no significant EIA effects on benthic subtidal and intertidal ecology from the Mona Offshore Wind Project when considered cumulatively with other projects.

2.8 Offshore Biodiversity, Ecology and Natural Environment – Marine Mammals

Table 2.8: REP3-093 - NRW - Offshore Biodiversity, Ecology and Natural Environment – Marine Mammals

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
REP3-093.18	The Applicant JNCC NRW(A)	Q1.17.9 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.	Scenario 2 would be preferable over Scenario 1 although both would be acceptable. This is because Scenario 2 aligns better with the 2022 SNCB position statement on UXO clearance where SNCBs explicitly stated that low order clearance should be the default method. Inclusion of low-order clearance of UXO in the DCO and DML is both in agreement with the position statement and demonstrates more commitment to the low order approach since no additional ML applications would be needed except in the case of a high order clearance. This position is also applicable to the transmission assets Marine Licence.	The Applicant notes the JNCC response. The Applicant has submitted a position paper on UXO clearance at Deadline 4 (S_D4_56).

2.9 Offshore Biodiversity, Ecology and Natural Environment - Ornithology

Table 2.9: REP3-093 - NRW - Offshore Biodiversity, Ecology and Natural Environment - Ornithology

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
REP3-093.19	JNCC NRW(A)	Q1.17.3 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?	We note that NRW have not raised any concerns with the DAS data reflecting Manx shearwater baseline characterisation. However, we note that there are known limitations of DAS in relation to crepuscular and nocturnal species such as Manx shearwater. This is because DAS, out of necessity, need to be conducted during daylight hours. Therefore, it is likely that some activity of this species will have been missed. However, we consider that the significance of this is most likely to be greatest at locations in close proximity to colonies, where Manx shearwater will often gather in larger numbers at dusk to avoid predation as adults return to the colony at night. Given the distance of the proposed Mona project array from Manx shearwater colonies, we do not consider such gatherings are likely in the array area or in close proximity to it. Therefore, we are satisfied that the distribution identified in the site-specific DAS surveys is likely to be representative of the use of the area.	The Applicant acknowledges NRW's conclusion and agreement that the DAS sufficiently captures the usage of the Offshore Ornithology Survey Area (the area surveyed by the site-specific DAS) for Manx shearwater.
REP3-093.20	JNCC NRW(A)	Q1.17.4 Are you are satisfied with the collision risk assessment for Manx Shearwater and its conclusion. If not, can you provide evidence to justify your position?	We note that NRW have not raised any concerns regarding the Manx shearwater collision risk assessment. However, we note the concerns raised by the RSPB regarding the collision risk modelling does not adequately consider attraction to lighting by Manx shearwater, as noted in their Relevant Representations [RR-071] and Statement of Common Ground [REP2-088]. Manx shearwaters are known to be attracted to light and can also be disoriented, for example due to the lighting at the top of a wind turbine. However, we note that this additional collision risk cannot be modelled in the current methods to assess collision risk and we are not aware there is currently any evidence available to quantify that risk. Therefore. given the limitations of the existing evidence base, we are satisfied that the collision risk model is as robust as it currently can be.	The Applicant welcomes NRW's view that the collision risk models are as robust as they can be in predicting impacts to Manx shearwater. The Applicant also acknowledges NRW's comment that it is not possible to quantify the risks associated with the attraction of Manx shearwater to navigation lighting of offshore wind farms.

2.10 Onshore Biodiversity, Ecology and Natural Environment

Table 2.10: REP3-093 - NRW - Onshore Biodiversity, Ecology and Natural Environment

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
REP3-093.21	DCC, CCBC, NRW (A) RSPB Cymru NWWT	Q1.18.8 OLEMP [REP2-034] Are you satisfied with the Applicant's onshore/landfall approach to: i) habitats - mitigation, management, and monitoring; and ii) protected species – mitigation, management, and monitoring. If not, can you provide reasons with supporting evidence to justify your position.	Please refer to Ecology (Terrestrial) Response to Applicant Deadline 3 submission, section 2.4.	This response is noted by the Applicant. The Applicant is exploring the options for including long-term monitoring and maintenance in the Outline Landscape and Ecology Management Plan and will provide an update at Deadline 5.

2.11 Seascape and Visual Resources

Table 2.11: REP3-093 - NRW - Seascape and Visual Resources

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
REP3-093.22	NRW (A)	Q1.20.1 Seascape, Landscape Visual Impact Assessment (SLVIA) In [RR-011], paragraph 3.1.2.5, you outline that there are methodological and presentational issues with the visualisations and figures within the SLVIA. • Could you describe these issues in more detail? • Provide specific examples of where visualisations and/or photography are unsuitable or not presented in accordance with best practice guidance. Comment on the Applicant's response provided in paragraph 1.2.4, [PDA-012].	Please refer to Paragraph 267 in our written representations [REP1-056] for further information on this matter. Additionally, we advise best practice guidance on visualisation techniques for offshore wind turbines is provided in the NatureScot guidance on the Visual Representation of Wind Farms, Version 2.2, February 2017. This guidance recognises there can be difficulties in photographing wind farms due to the lack of contrast between light-coloured turbines and a light-coloured sky and emphasises that 'It is therefore essential that all baseline photographs are taken in good visibility'1. Regarding offshore wind turbines specifically, the guidance advises that: • 'Practitioners should aim to prepare visualisations representing the specific time of day and season when there is optimum visibility and clarity'.2 (our emphasis). • 'A key factor is achieving sufficient contrast between the sky and the sea so that the horizon is clear'.3 (our emphasis). At the following viewpoints (VP) within the Isle of Anglesey National Landscape (IoA NL), there is not sufficient contrast between the sky and the sea, and therefore the horizon is not sufficiently clear: • VP 1: Mynydd y Garn trig point (Figures 1.1 - 1.2) [APP-106]. • VP 4: Bwrdd Arthur trig point (Figures 4.1 - 4.2) [APP-106]. • VP 26: Yr Arwydd trig point, near Mynydd Bodafon (Figures 22.1 - 22.2) [APP-108]. • VP 55: Trwyn Eilian (Point Lynas) (Figures 44.1 - 44.2) [APP-111]. Although a greater contrast between the sea and sky was achieved in the photographs at the other IoA NL viewpoints (below), low cloud and/or mist was present which means these visualisations also do not represent optimum visibility and clarity: • VP 2: Llanlleiana Head (Figures 2.1 - 2.2) [APP-106]. • VP 3: Mynydd Eilian (Figures 3.1 - 3.2) [APP-106]. • VP 24: Bull Bay, Amlwch (Figures 20.1 - 20.2) [APP-108]. • VP 25: Moelfre Headland (Figures 21.1 - 21.2) [APP-108]. • VP 28: Penmon Point (Figures 24.1 - 24.2) [APP-108]. • VP 57: Trwyn Cemlyn (Figures 46.1 - 46.2) [APP-111]. It is also advised that when using the visualisations on site, the landscape appears smaller in the photomontages than in reality. This means that when viewing the photomontages on site or at 100% on screen, the turbines will also appear smaller than they would in reality. This issue can be seen when comparing the Applicant's photomontages with those prepared from the same viewpoints for the Awel y Môr application. For example, compare VP 3 Mynydd Eilian in both applications4. The turbines from both schemes are located at a similar distance from this viewpoint, but the turbines within the Awel y Môr Array appear significantly larger, despite being smaller turbines.	Photography The Applicant agrees that some of the photography is not up to the highest standard, despite visiting representative viewpoints on several occasions, however, this is a small number of images out of a large number of viewpoints and this has not affected the assessment process, as verification in the field was undertaken, over a period of two years, in different seasons and different weather conditions (i.e. the SLVIA is not only based on the representative viewpoints). Further photography was taken on 19 October 2024, following Issue Specific Hearing 3, at offshore VPs 1, 2, 3, 4, 26 and 55. Photomontages from these representative viewpoints have been undertaken and are presented in Visualisations for Viewpoints 1, 2, 3, 4, 26 and 55 (S_D4_6.2 and S_D4_6.3, HAP_ISH3_20). Wireline Visualisations The Applicant refers to its response to ExQ1 Q1.20.6 (REP3-062). The Applicant discussed NRW's concerns on this matter in relation to VP2 in a meeting on 8 October 2024. The Applicant confirms that the turbine heights are correct and the same in all wirelines and photomontages, that is 364 m to tip for the Mona Array and 332 m to tip for Awel y Môr. The apparent difference may be due to the colour used on the Mona turbines – the red of the Awel y Môr turbines being brighter/more apparent than the blue Mona turbines. The Applicant also notes that the Awel y Môr turbines are adjacent to the smaller turbines of Gwynt y Môr, so the contrast between the two different turbine heights is more apparent, whereas the Mona turbines are set apart from both other wind farms and the coast, so are without scale references. The Applicant would also refer the ExA to its response to paragraph REP3-090.178 in Response to NRW Deadline 3 Response (S_D4_16). The Applicant also notes the advice given by CCW (now NRW) in Welsh seascapes and their sensitivity to offshore developments (Briggs and White, 2009; Appendix 1, page 252): "*Observation of offshore wind farms that have been built in recent years around the UK show how perspective can shorten our perception of distance, so that a turbine say 10 km away and another, say 12 km away, may in some views appear only a short distance apart.*" Blade orientation Please refer to the Applicant's response to Q1.20.6 of Response to Examining Authority's Written Questions (ExQ1) (REP3-062). The orientation of the blades in the Seascape and Visual Resources: Cumulative Wirelines (REP3-046), all had one vertical blade (i.e. at maximum height). The blade orientation change has not altered the conclusions of the assessment.

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
			Regarding the supporting wireline visualisations, we advise these do not accord with recommended best practice as they do not show all turbines with one blade positioned straight upwards5 i.e. at maximum height. We advise the visualisations will inevitably form a key piece of evidence in the determination of the seascape and visual effects of the proposed development. It is therefore crucial they are of a high quality and that they can be relied upon, particularly because there are limitations to all visualisations, even those prepared in optimum conditions. For example, as explained in the NatureScot guidance, 'a visualisation can never show exactly what the wind farm will look like in reality due to factors such as: different lighting, weather and seasonal conditions which vary through time and the resolution of the image'.[6] Key limitations in replicating the visual experience include: • 'It is generally impossible to reproduce the full contrast range visible to the human eye'[7] and that 'neither the screen nor the printed image can capture the contrast or depth you see in real life'[8]; and • 'A static image cannot convey turbine movement, or flicker or reflection from the sun on the turbine blades as they move'.[9] We note the Applicant's response provided in paragraph 1.2.4 [PDA-012], but advise other applications e.g. Awel y Môr were able to capture more suitable baseline photography at viewpoints from within the IoA NL. For example, compare the Applicant's photograph/ photomontage from VP 55: Trwyn Eilian (Point Lynas) (Figure 44.2) [APP-111] with the photomontage taken from the same location (Ref VP 2) and submitted as part of the Awel y Môr application10. Both Arrays are located at a similar distance from this viewpoint.	
REP3-093.23	NRW (A)	Q1.20.2 Magnitude of change In [REP-1-056] paragraphs 360 and 361, you describe the implication of the ratio between the heights of the turbines and the distance from them for a 364m blade-tip height – as outlined in NRW Evidence NRW Report No 315. This determines the likelihood of the magnitude of change and overall effects. • Is the determination of the likelihood of effects and their level based upon only the ratios described, or is an element of judgement required? • Would the magnitude of change and overall effect as informed by the ratios described also depend on other features, obstacles, or landscape characteristics?	The determination of effects is not based only on the ratios described. The determination of effects requires judgements based on the specific details of the application, the character and specific sensitivities of its context, and the best available evidence relating to these matters, which, in this case includes the NRW Evidence Reports. The research undertaken in preparing the NRW Evidence Report indicates that, when reaching judgements on visual effects of offshore wind turbines, there is a relationship between the height of offshore wind turbines and the distance offshore. Notwithstanding this, the Report recognises the significance of the effects of offshore wind turbines is a judgement that will vary depending on a number of factors11. It advises that based on the review undertaken of previous examinations and inquiries relating to offshore windfarms inter-visible with either National Parks or AONBs (National Landscapes) that12: • 'Factors which have been considered by Inspectors or Examining Authorities to reduce harm include a very limited number of views from designated areas, whether a designated area relates mainly to the land, and where there are significant developments such as power stations or urban areas located on the coast or offshore, such as existing offshore windfarms'. • 'Factors which have been considered to increase harm include where the designated areas affected have special qualities relating to the coast and sea, where wind farms are proposed directly off the coast of these designated areas, where multiple designated areas are affected and where other factors such as visual overlapping of turbines (even with smaller sizes) are apparent'. In relation to the Factors reducing harm, we advise:	Please refer to the Applicant's responses on: The use of wirelines to determine thresholds in Q1.20.3 of REP3-062 at Deadline 3. The status of White 2019 (NRW Evidence reports, Stages 1 to 3) as not peer-reviewed, consulted on or adopted, in paragraph 1.2.3.7 of Applicant's Response to Relevant Representation from Natural Resources Wales (NRW): RR-011.98 to RR-011.104 (S_PD_3.4). Thresholds: Please refer to the Applicant's response to NRW's written response 186 (REP2_080) regarding the use of thresholds. GLVIA3 (Landscape Institute and Institute of Environmental Management and Assessment, 2013; Preface, page x) concentrates on principles and process rather than providing a formulaic recipe. GLVIA3 (Landscape Institute and Institute of Environmental Management and Assessment, 2013; paragraph 3.32) advises against using 'thresholds of significance,' such as those used in the buffer studies, and promotes professional judgement. Views from nationally designated landscapes Regarding visibility along the "entire northern coastline" of the Isle of Anglesey, the Applicant assumes that this is referring to a viewer who is either walking east (towards the Mona Array Area), rather than west (away from the Mona Array Area) and/or that the viewer is looking directly at the Mona Array Area, rather than at the remainder of the panoramic views (see Appendix to Response to WRs: NRW (REP2-080), response to paragraph 168). For example, at VP28 Penmon Point (Trwyn Penmon), various views are available. From the northern beach, the view is north-northwest. The

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	NRW response	Applicant's response
			• The impacts of the Mona Array would not be limited to a 'very limited number of views from designated areas'. In relation to the IoA NL, the Applicant's Zone of Theoretical Visibility (ZTV) analysis illustrates the turbines would be visible along the entire northern coastline of the Island (SLVIA Figure A.4), notwithstanding any screening provided by localised variations in topography and vegetation/buildings etc. Consequently, 11 different viewpoints distributed across the full extent of the north coast of the IoA NL are included within the SLVIA. • The IoA NL designated area does not relate mainly to the land; it relates fundamentally to the coast and views of the open sea are integral to its character and special qualities, including 'expansive views / seascapes' and 'peace and tranquillity'[13]. • At the majority of locations from which the Mona Array would be visible, on the IoA NL, there are no significant developments such as power stations or urban areas located on the coast or offshore. • At some of the viewpoints within the IoA NL, existing offshore windfarms are visible. For example, wind turbines within the Gwynt y Môr Array are visible from Penmon Point, at a distance of approximately 29km. The consented Awel y Môr development would also be visible along the northern coast of the IoA. In relation to the factors which have been considered to increase harm: • The IoA NL has special qualities relating to the coast and sea, and the proposals would impact on those qualities. • It is not clear what is meant by 'wind farms are proposed directly off the coast of these designated areas'. It is not clear whether this relates to distance or the angle of view. • Views from multiple designated areas in Wales would be affected by the proposed offshore development, namely the IoA NL and Eryri National Park. Some visual overlapping of turbines within the Mona Array may occur in conditions of very good to excellent visibility, at locations such as Penmon Point, but this is not unusual for a wind farm of this size.	view from the car park is northeast to the lighthouse and Puffin Island (Ynys Seiriol). The view east is along the coast to Conwy and the Great Orme. The view southeast to south from the southern beach/foreshore is across the Menai Straits (Afon Menai) to Conwy Bay (Bae Conwy) and the mountains of Eryri. The view southwest to northeast are of the houses at the point and inland to the Island of Anglesey (Sir Ynys Môn) itself. In Applicant's Response to Relevant Representations from Natural Resources Wales (NRW): RR-011.89 to RR-011-97 (PDA-011), figures of the Welsh Wales Coast Path were provided (Figures 1.1, 1.2 and 1.3). These figures assume that a viewer is walking along the Wales Coast Path, towards the Mona Array Area, from whichever direction. These also provide distances of the Wales Coast Path from the Mona Array Area. The Applicant has responded to location of the Mona Array Area, in an area of open sea and seascape character, in Appendix to Response to WRs: NRW (REP2-080), response to paragraph 164. The Applicant has assessed the special qualities of the nationally designated landscapes in Volume 6, Annex 8.5: International and nationally designated landscape study, of the Environmental Statement (APP-105), as noted in Appendix to Response to WRs: NRW (REP2-080), response to paragraph 179. The Applicant has assessed the seascape, landscape and visual impacts of the Mona Array Area based on a realistic worst-case (MetOffice visibility of Excellent, which is visibility beyond 40 km) this is evidenced by the Applicant finding adverse (non-significant) seascape, landscape and visual effects out to 50+ km, barring one significant cumulative effect within Eryri NP. Discussions between the Applicant and NRW on these matters are ongoing as part of the SoCG discussions.
REP3-093.24	NRW (A) The Applicant	Q1.20.3 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?	Although the Stage 2 Guidance on Siting Offshore Windfarms[14] refers to a limit of negligible effects, this is not defined in the Guidance – it must be tested on a case by case basis. Our comments are based on the fact the Array is not located beyond the limit of a 'low magnitude of effects' which is defined (albeit approximately) in the Guidance. The buffer distances for a low magnitude of effect for turbines between 300-350m tall (the tallest considered in the study) is 44km[15]. *The Guidance explains that 'Low magnitude buffer distances are an indication that there is a likelihood that there are no significant effects on a high sensitivity receptor for the size of wind turbine at, or beyond, the distance stated.'* [16] i.e. beyond 44km. It is therefore reasonable to assume the limit of negligible effects would typically be expected to be beyond this distance. The Mona Array is located closer to the IoA NL (and Heritage Coast) than 44km, and at its closest is 29km. It is within 37km of viewpoints in the ENP. It therefore does not adhere to the recommended principle in the Guidance to *'Locate developments beyond the limit of negligible visual effects, particularly for the highest sensitivity National Parks/AONBs overlaid with Heritage Coasts*'.[17]	The Applicant refers to its response to Q1.20.3 (REP3-062).

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REP3-093.25	NRW (A)	Q1.20.4 Additional information To what extent does the Applicant's response in [PDA-012] address your points raised in [RR-011], paragraph 3.1.2.6, concerning additional information requested in the PEIR response?	The Applicant's provision of further analysis regarding potential cumulative visibility of the Mona and Awel y Môr Arrays from the Wales Coast Path satisfies our previous request.	The Applicant notes NRW (A)'s response.
REP3-093.26	NRW (A)	Q1.20.5 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 has not provided the information we requested, and we continue to advise this information should be provided. However, we note the Applicant's Response in [PDA-012] is now superseded by [REP2-080], in which the Applicant states they intend to submit: • Additional cumulative wirelines at Deadline 3 which show the Mona Array in combination with the Awel y Mor Array at additional viewpoints, and 'Cumulative visuals' of the Mona and Awel y Môr onshore substations and the National Grid Extension where sufficient information is available.	Cumulative wirelines of the Mona Array and the Awel y Mor Array are included in REP3-046. Cumulative photomontages of the Mona Onshore Substation, the Awel y Môr Onshore Substation and the National Grid Bodelwyddan substation extension are included in Landscape and Visual Resources – Cumulative Visualisations (REP3-047, REP-048 and AS-047).
REP3-093.27	NRW (A)	Q1.20.6 SLVIA viewpoints In [REP-1-056] paragraph 374, you state that "Existing offshore wind farms are either not visible from or have a negligible impact on the majority of SLVIA viewpoints". Would this still be true after the construction of the Awel Y Mor Offshore Wind Farm?	We advise this would change because the Awel y Môr Array would be visible at the majority of the SLVIA Viewpoints on the IoA NL and within the Eryri National Park (ENP) and, at the majority of viewpoints would result in effects which are greater than negligible. At certain viewpoints, turbines within the Awel y Môr Array (which are smaller than those proposed in the Mona Array) would be closer to the viewer than those in the Mona Array e.g. VP 4. The extent to which the Awel y Môr Array would be visible or would interact with the Mona Array at SLVIA viewpoints within the IoA NL and ENP is restricted by the omission of cumulative wirelines from the majority of viewpoints within the IoA NL and ENP (cumulative wirelines are only provided for VPs 3 and 28 within the IoA NL, and VP 6 within the ENP).	The Applicant notes that the addition of man-made elements (e.g. Awel y Môr) into views would decrease the sensitivity of the viewer where such elements are visible, just as the sensitivity of visual receptors that currently have views of the north Wales offshore wind farm cluster (Gwynt y Môr, Rhyl Flats, Burbo Bank and Burbo Bank Extension) have a lower sensitivity than viewers where none are visible. Cumulative wirelines of the Mona Array and the Awel y Môr Array are included in Seascape and Visual Resources: Cumulative Wirelines (REP3-046).
REP3-093.28	NRW (A)	Q1.20.10 Enhancement and offsetting measures In [REP1-056] paragraph 386, you state that you consider that the "Mona array would cause significant adverse effects on the IoA NL and the ENP", and that "If the Applicant cannot mitigate these effects, they should provide offsetting/enhancement measures". It is also suggested that a proportionate enhancement scheme for the IoA NL and ENP should be provided to compensate for adverse effects consent were to be granted. Are there any specific enhancement or offsetting measures or projects that you would propose?	We consider offsetting/enhancement measures should support the purpose of conserving and enhancing the natural beauty of the affected designated landscapes, and contribute to the conservation and enhancement of the Special Qualities, as set out in the applicable Management Plan. The Management Plans identify the actions required to ensure these qualities are conserved and enhanced for future generations. These actions could be used to identify the most appropriate offsetting/enhancement measures or projects. For example, 'Enhancing Countryside and Coastal Character' is a key theme within the Isle of Anglesey Area of Outstanding Natural Beauty Management Plan 2023-2028 and this specifies, for example, an action to maintain and enhance traditional landscape features such as woodlands, hedgerows and dry stone walls within the AONB[18].	The Applicant refers to its response to HAP3_ISH3_22 in S_D4_6, regarding discussions on a without prejudice compensation / enhancement for the Isle of Anglesey National Landscape.
REP3-093.29	The Applicant	Q1.20.11 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?	If adverse effects on the IoA NL and ENP are not mitigated, the Applicant should provide offsetting/enhancement measures. Opportunities to enhance designated landscapes are encouraged by the Welsh National Marine Plan 2019 but no proposals for enhancement are included. Enhancements represent compensation and/or offsetting and not mitigation for adverse effects, as any enhancements would not be directly related to the impacts. Notwithstanding this, if DCO consent is to be granted, we consider that a proportionate enhancement scheme for the IoA NL and ENP should be provided to compensate for the adverse effects of the Mona Array on these nationally important landscapes. In this regard, we consider a requirement similar to R24 (in terms of the principle of requiring an enhancement scheme for	The Applicant refers to its response to HAP3_ISH3_22 in S_D4_6, regarding discussions on a without prejudice compensation / enhancement for the Isle of Anglesey National Landscape.

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			compensation) would be appropriate for the Mona Offshore Wind Farm DCO.	
REP3-093.30	The Applicant NRW (A)	Q1.20.12 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. • 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?	The duty is intended to ensure the purpose of the designation is considered in decision making. Whilst an enhancement scheme would not directly mitigate the adverse effects of the offshore components, it would enable the conservation and enhancement of other aspects of the affected landscapes, thereby supporting the purpose for which the designation exists in relation to any such aspects. The decision on granting consent lies with the ExA, and it is for the ExA, taking into consideration all relevant information, whether or not the implementation of a suitable enhancement scheme as described would allow the duty to be complied with.	The Applicant refers to its response to HAP3_ISH3_22 in S_D4_6, regarding discussions on a without prejudice compensation / enhancement for the Isle of Anglesey National Landscape.
REP3-093.31	NRW (A)	Q1.20.14 Lighting effects on National Landscapes In [REP1-056] paragraph 416, it states that based upon previous experience, you consider that the aviation warning lighting for Mona Offshore Wind Farm is "expected to be visible from the northern coast IoA and the impact on dark skies would not be negligible". • Can you provide further detail or information concerning what you consider to be the impacts of the aviation warning lighting on the dark skies within the IoA National Landscape? • Can you comment on the intensity levels specified by the Applicant in Table 8.18 [APP-060] and how these would affect the IoA dark skies?	We note Table 8.18 [APP-060] states the turbine aviation warning lights would be operated at the lowest permissible intensity level (200 candelas (cd)) in good visibility conditions. By 'good visibility' we assume the Applicant means exceeding 5km. If this mitigation measure was secured as a Requirement of the DCO, we advise it is expected to reduce the impact of the lighting on receptors within the IoA NL to a negligible level compared with lighting viewed at the full intensity (2000 cd) in good visibility, which would otherwise result in impacts greater than negligible. Based on emerging guidance on this issue, we advise an aviation warning light at 200 cd viewed at the closest location within the IoA NL (29km distance) in clear weather would, broadly, be the same as viewing a car brake light at approximately 17.4km[19]. This change is expected to be difficult to discern. There is the potential for warning lights to be viewed at 2000 cd in clear weather, even where automatic dimming mitigation is included. For example, this may occur where patchy cloud on one side of the wind farm results in the maximum intensity being triggered, even though the other side of the wind farm is in clear conditions. It is not known how often this might occur.	The Applicant refers to its response to Q1.20.13 (REP3-062). In addition, the Applicant is currently in discussions with NRW on the SoCG on SLVIA matters and notes that this matter is currently under discussion between the Applicant and NRW.

3 REFERENCES

Briggs, J. H. W. and White, S. (2009) Welsh Seascapes and their Sensitivity to Offshore Developments (CCW Policy Research Report No. 08/5)

Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment: Third Edition.