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MONA OFFSHORE WIND PROJECT

Response to Examining Authority's Written Questions (ExQ2)

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Image of an offshore wind farm

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Appropriate Assessment	A step-wise procedure undertaken in accordance with Article 6(3) of the Habitats Directive, to determine the implications of a plan or project on a European site in view of the site's conservation objectives, where the plan or project is not directly connected with or necessary to the management of a European site but likely to have a significant effect thereon, either individually or in-combination with other plans or projects.
Bodelwyddan National Grid Substation	This is the Point of Interconnection (POI) selected by the National Grid for the Mona Offshore Wind Project.
Competent Authority	Regulation 6(1) defines competent authorities as "any Minister, government department, public or statutory undertaker, public body of any description or person holding a public office".
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Statement (ES)	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Mona Offshore Wind Project.
Evidence Plan Process	The Evidence Plan process is a mechanism to agree upfront what information the Applicant needs to supply to the Planning Inspectorate as part of the Development Consent Order (DCO) applications for the Mona Offshore Wind Project.
Expert Working Group (EWG)	Expert working groups set up with relevant stakeholders as part of the Evidence Plan process.
Inter-array cables	Cables which connect the wind turbines to each other and to the offshore substation platforms. Inter-array cables will carry the electrical current produced by the wind turbines to the offshore substation platforms.
Interconnector cables	Cables that may be required to interconnect the Offshore Substation Platforms in order to provide redundancy in the case of cable failure elsewhere.
Intertidal access areas	The area from Mean High Water Springs (MHWS) to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities.
Intertidal area	The area between MHWS and MLWS.
Landfall	The area in which the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling.
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process. In addition, licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).

Term	Meaning
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.
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,

Term	Meaning
	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).
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
AEP	Annual Energy Production
AfL	Agreement for Lease

Acronym	Description
ALARP	As Low As Reasonably Practicable
ALO	Agricultural Liaison Officer
AoS	Area of Search
ATS	Air Traffic Service
BRAG	Black-Red-Amber-Green
CAA	Civil Aviation Authority
CCBC	Conwy County Borough Council
CEA	Cumulative Effects Assessment
CoCP	Code of Construction Practice
CSIP	Cable Specification and Installation Plan
DCO	Development Consent Order
Defra	Department for Environment, Food and Rural Affairs
DESNZ	Department for Energy Security and Net Zero
dML	deemed Marine Licence
EIA	Environmental Impact Assessment
EMF	Electromagnetic Fields
ETV	Emergency Towage Vessel
EWG	Expert Working Group
ExA	Examining Authority
GHG	Greenhouse Gas
ICNIRP	International Commission On Non-Ionizing Radiation Protection
IEF	Important Ecological Feature
IEMA	Institute for Environmental Management and Assessment
JNCC	Joint Nature Conservation Committee
LAT	Lowest Astronomical Tide
LEMP	Landscape and Ecological Management Plan
MCA	Maritime and Coastguard Agency
MDS	Maximum Design Scenario
MGN	Marine Guidance Note
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMMP	Outline Marine Mammal Mitigation Protocol
MoU	Memorandum of Understanding
NAS	Noise Abatement Systems
NPS	National Policy Statement

Acronym	Description
NRA	Navigational Risk Assessment
NRW (A)	Natural Resources Wales Advisory
NSIP	Nationally Significant Infrastructure Project
OCMS	Offshore Construction Method Statement
OEWS	Offshore Wind Environmental Standards
OFLCP	Outline Fisheries Liaison and Coexistence Plan
OFLO	Offshore Fisheries Liaison Officer
OIPMP	Offshore In-principle Monitoring Plan
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
POI	Point of Interconnection
PRoW	Public Rights of Way
PSR	Primary Surveillance Radar
SAC	Special Area of Conservation
SLA	Service Level Agreement
SMZ	Scallop Mitigation Zone
SNCBs	Statutory Nature Conservation Bodies
SoCG	Statement of Common Ground
SPA	Special Protection Area
SSCs	Suspended Sediment Concentrations
SSR	Secondary Surveillance Radar
TM	Tertiary Measure
TPO	Tree Preservation Order
UWSMS	Outline Underwater Sound Management Strategy
UXO	Unexploded Ordnance
VMS	Vessel Monitoring System
VP	Viewpoint
WFD	Water Framework Directive
WNMP	Welsh National Marine Plan

Units

Unit	Description
dB	Decibel
GW	Gigawatt
km	Kilometres

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

1 Response Examining Authority's Written Questions (ExQ2)

1.1 Introduction

1.1.1.1 The Applicant's response to the Examining Authority's second set of Written Questions can be found below.

2 Response to Examining Authority's Written Questions (ExQ2)

2.1 General and Cross Topic

Table 2.1: Response to ExQ2: General and Cross Topic Questions

Ref. No.	Question to	Written Question	Applicant's response
Q2.0.2	The Applicant	**IGP Solar 21 Limited battery storage project** The ExA notes that very limited information on the IGP Solar 21 Limited battery storage project has been submitted into the public domain. As the application is due to be submitted in Summer/Autumn 2025, is it likely that construction periods for the battery storage project and the Proposed Development will overlap? If this is the case, is it correct that no assessment should be made at all, even using estimates, of potential cumulative effects?	The Applicant notes the proposed submission timeframe of the IGP Solar 21 Limited battery storage project. Cumulative impact assessments can only be undertaken on information that is within the public domain. The Planning Inspectorate' Advice on Cumulative Effects Assessment (2024) provides a list of sources. It is acknowledged that very few details about the battery storage project have been published into the public domain including to the local planning authority (in this case Denbighshire County Council). To allow any cumulative assessment to be undertaken, key parameters of the project (e.g. location, size) would have to be available in the public domain. The Applicant notes that this information is not currently available and it is not for the Applicant to undertake an assessment for another project or make assumptions about that project – and any reliance placed on such approach would be vulnerable to legal challenge. The Planning Inspectorate guidance states that the cumulative assessment undertaken should be undertaken at a level of detail proportionate to the information available – as the Applicant has stated above, there is insufficient information about the IGP Solar project for the Applicant to undertake a cumulative assessment with that project.
Q2.0.3	The Applicant Welsh Government	**Statement of Common Ground** Produce a Statement of Common Ground on all issues of relevance to The Welsh Government. For submission at Deadline 5, with final version at Deadline 7. Add The Welsh Government to the Statement of Commonality.	The Applicant and Welsh Government met on 25 November to discuss the Examining Authority's (ExA's) request for a joint Statement of Common Ground (SoCG). Welsh Government confirmed that its principal areas of interest relate to archaeology and heritage, and highways (on behalf of Welsh Ministers). Agreement on archaeology and heritage is being progressed through a SoCG with Cadw (REP1-034), an update of which will be submitted to the examination at Deadline 6, subject to agreeing meeting dates between the parties. The matter of Welsh Ministers' interests in highways has separately been progressed through relevant Protective Provisions and with a meeting held on 25 November to progress agreed drafting. Agreement has been reached between the parties on final wording, and the agreed Protective Provisions are included in the Development Consent Order (DCO) which has been submitted at Deadline 5 (C1 F06).

Ref. No.	Question to	Written Question	Applicant's response
			Welsh Government and the Applicant can confirm that there are no other open issues, or areas of disagreement between the parties, and therefore do not intend to submit a SoCG into the Mona examination.
Q2.0.4	All parties	**Summaries of written submissions over 1500 words** The ExA would remind parties that any written submissions that exceed 1500 words should also be accompanied by a summary which should not exceed 10% of the original text. The summary should set out the key facts of the written submission and must be representative of the submission made.	The Applicant notes the request.

2.2 Air Quality and Human Health

Table 2.2: Response to ExQ2: Air Quality and Human Health

Ref. No.	Question to	Written Question	Applicant's response
Q2.1.1	The Applicant	**Compliance with NPS EN-5** As required by Section 2.9.55 of the National Policy Statement for Electricity Networks Infrastructure (EN-5), can you signpost your evidence of compliance with the ICNIRP guidelines and the factors specified in Section 2.10.11 of NPS EN-5?	The Applicant notes that whilst NPS EN-5 covers all electricity networks infrastructure, much of it only relates to overhead powerlines. Notwithstanding that the Mona Offshore Wind Project onshore export cable will be installed underground rather than overhead lines, the Applicant confirms the following: In relation to the three points for consideration under paragraph 2.9.55 of NPS EN-5: 1) The Mona Offshore Wind Project commitment to ICNIRP guidelines is set out in ES Volume 4, Chapter 4: Human health assessment [APP-078], Table 4.19. The relevant ICNIRP guidelines are: • ICNIRP. (1998). ICNIRP Guidelines for Limiting Exposure To Time-Varying Electric, Magnetic And Electromagnetic Fields (Up To 300 Ghz). International Commission. • ICNIRP. (2010). ICNIRP Guidelines for Limiting Exposure To Time-Varying Electric, Magnetic And Electromagnetic Fields (1-100 kHz). International Commission. The more conservative public exposure limits are in the ICNIRP 1998 guidance, which are 9 kV/m for electric fields and 360 µT for magnetic fields. 2) The Mona Offshore Wind Project is required to be compliant with the Electricity Safety, Quality and Continuity Regulations 2002, which imposes requirements regarding the installation and use of electrical networks and equipment owned or operated by generators, distributors, and meter operators, and the participation of suppliers in providing electricity to consumers. In relation to the three points for consideration under paragraph 2.10.11 of NPS EN-5. 1) Due consideration has been given to the specification of the Project's electrical infrastructure, as required by EN-5 para 2.10.11. For example, ES Volume 1, Chapter 3: Project Description [APP-050] paragraph 3.7.2.1 confirms "*The onshore export cables will be buried for their entire length; overhead lines are not proposed for the Mona Offshore Wind Project*." Paragraph 3.7.2.14 confirms "*The Mona Onshore Cable Corridor will be approximately 15 km in length. The target depth of the cable trenches will be approximately 1.8 m; the cables will be buried a minimum depth of*

Ref. No.	Question to	Written Question	Applicant's response
			1.2 m to the top of the cable ducting." Table 3.32 sets out the onshore export cable installation parameters. 2) The Mona Offshore Wind Project has committed to comply with the current public exposure guidelines (the International Commission On Non-Ionizing Radiation Protection (ICNIRP) guidelines) and the policy on phasing applies to high voltage overhead powerlines, which are not relevant to the Mona Offshore Wind Project onshore export cables, as these will be buried for their entire length. Buried cables do not produce an electric field at the surface. Magnetic fields vary with design but are engineered to be ICNIRP compliant. Illustratively the National Grid publication, 'Undergrounding high voltage electricity transmission lines, The technical issues' (National Grid, 2015), notes in Section 9 that for a 400 kV buried cable 0.9 m underground, the typical magnetic field strengths at the surface directly above the cable is 24 µT (less than a tenth of the public exposure limit and this drops by almost an order of magnitude within 5 m). The Mona Offshore Wind Project commitment to ICNIRP guidelines includes the onshore substation. As noted in EN-5 paragraph 2.9.51 *"For electricity substations, the EMFs close to the sites tend to be dictated by the overhead lines and cables entering the installation, not the equipment within the site'.* 3) The Mona Offshore Wind Project has had regard to Department of Health and Social Care advice on Electromagnetic Field (EMF) exposures. The Department of Health's advice on health effects of EMF exposure has not changed since 2013 Electric and magnetic fields: health effects of exposure - GOV.UK. However, it is noted that the UK Health Security Agency guidance Electric and magnetic fields: reducing exposure, 2012 was updated in March 2024 Electric and magnetic fields: reducing exposure - GOV.UK. The advice relates predominately to voluntary steps people can take within their home to reduce EMF exposures on a precautionary basis if they have concerns about EMF. The advice note opens by stating "*The exposures in our homes are usually much lower than the guidelines levels, which provide adequate protection*." The advice notes goes on to state that "*measures to reduce fields, such as avoiding the routing of power lines near to homes, or not building homes close to power lines, are not needed*". Even so, the Mona Offshore Wind Project site selection had specific regard to the proximity to residential properties, as set out in Applicant's Response to s51 Advice - F1.4 Site Selection and Consideration of Alternatives (AS-016).

Ref. No.	Question to	Written Question	Applicant's response
Q2.1.2	The Applicant	**Actual EMF Risk** At Section 4.8.8.7 of ES Vol. 4, Chapter 4 [APP-078] you say that you will adopt and implement relevant design guidelines of the ICNIRP (International Commission on Non-Ionizing Radiation Protection) and UK Government voluntary code of practice that are deemed sufficient for avoiding actual EMF risk. In Table 4.9 thereof you add that relevant public EMF exposure guideline limits are noted in the National Policy Statement for Electricity Networks Infrastructure (EN-5) and that the Proposed Development would comply with them. • Who would be responsible for monitoring compliance with the guideline limits? • Would this be carried out proactively on a, for example, annual basis? • How would testing locations be chosen? • Who could local residents and/or landowners contact with concerns about compliance? What enforcement mechanisms are provided were the Proposed Development, individually or in combination with other sources of EMFs, found to breach the guideline limits?	The Applicant would be responsible for ensuring compliance with the guideline limits set out in the ICNIRP guidelines and the UK Government voluntary code of practice. Calculations will be undertaken as part of the detailed design, post-consent, to confirm the levels of EMF based on final cable burial depth and cable separation. These calculations will show EMF levels within the guideline limits as the cable will be buried at a suitable depth and will be offset from the nearest community buildings (e.g. dwellings or schools). Compliance with the ICNIRP guidelines and the UK Government voluntary code of practice will then be confirmed during the commissioning of the onshore export cables. As compliance with the ICNIRP guidelines will be confirmed at the commissioning stage no monitoring or mitigation is required.
Q2.1.3	The Applicant	**Potential impact of artificial light on residential amenity** The ExA is mindful of your ES Vol 3, Chapter 3 [APP-069] Table 6.19 and your Lighting Clarification Note [REP4-043]. However, Section 5.7.5 of the Overarching National Policy Statement for Energy (EN1) says that the Applicant should, amongst other things, assess the potential for emissions of artificial	The Applicant acknowledges that Section 5.7.5 of NPS EN-1 requires that potential impacts on residential amenity are considered as part of the EIA process. However, the Applicant notes that residential amenity is not defined within the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 or within NPS EN-1. The Applicant understands that residential amenity is a person's subjective experience of the pleasantness or attractiveness of a place. Several factors contribute to residential amenity including visual amenity, impacts from noise and vibration and disruption to traffic routes, which are assessed within specific topic chapters of the Environmental Statement. The Applicant's Lighting Clarification Note [REP4-043] sets out how it has considered artificial

Ref. No.	Question to	Written Question	Applicant's response
		light to have a detrimental impact on residential amenity as part of the ES. Can you signpost where this element of policy has been complied with in respect of both the construction and operational phases of the Proposed Development?	lighting emissions during construction and operation and that the lighting emissions were not considered to have significant effects on visual amenity. The Applicant also confirms that potential impacts on noise sensitive receptors and the environmental effects of traffic (e.g. traffic delay) have been assessed in Volume 3, Chapter 9: Noise and vibration [APP-072] and Volume 3, Chapter 8: Traffic and transport [APP-072] respectively and no significant effects were reported. The outcomes of these assessments have informed Volume 4, Chapter 4: Human Health [APP-078], including the assessment on community identity and population health, which the Applicant has used as a proxy for a residential amenity assessment. Based on the outcomes of the visual assessment (in APP-069 and REP4-043] Potential impacts of artificial light emissions during the construction and operational phase were scoped out of the human health assessment [APP-078] because any change in the pleasantness or attractiveness of a place is not considered to be so great as to have the potential for a likely significant effect on population health outcomes.
Q2.1.6	The Applicant	**Human Health Assessment** On foot of submission of your Construction Noise and Vibration Clarification Note [REP4-045] and proposed updating of the Noise and Vibration Chapter of the ES [APP-072] and the Construction noise and vibration technical report [APP-179] at Deadline 5, with reasoning for your position, please advise whether you need to update Sections 4.8.7 and/ or 4.10.7 of ES Vol 4, Chapter 4? Any such update should be submitted at Deadline 5.	As stated in the Construction Noise and Vibration Clarification Note (REP4-045), the updated noise assessments conclude that noise effects from construction activities along the Mona Onshore Cable Corridor (both trenchless and other) remain minor adverse (not significant), which is the same conclusion reported in Volume 3, Chapter 9: Noise and vibration (APP-072). While construction noise levels at the Onshore Substation have changed from those reported in Volume 3, Chapter 9: Noise and vibration (APP-072), the resulting impacts remain unchanged from those presented at application (i.e. minor adverse (not significant) effects). Construction vibration impacts will also remain unchanged from those reported in Volume 3, Chapter 9: Noise and vibration (APP-072), resulting in minor adverse (not significant) effects. Overall, despite the changes and corrections, the updated construction noise and vibration impacts remain unchanged from those reports in Volume 3, Chapter 9: Noise and vibration (APP-072). Accordingly, there will be no change to sections 4.8.7 or 4.10.7 of Volume 4, Chapter 4: Human Health (APP-078), as the sensitivities, magnitudes and significance levels reported remain unchanged, and there has been no (related) change to the cumulative developments assessed. Construction noise impacts from the installation of the onshore export cables at Landfall is reported in the updated Volume 3, Chapter 9: Noise and vibration (F3.9 F02) as minor

Ref. No.	Question to	Written Question	Applicant's response
			adverse. However, this change will not change the sensitivity, magnitude or significance conclusions reported in Volume 4, Chapter 4: Human Health (APP-078) in relation to noise impacts on population health.

2.3 Construction

Table 2.3: Response to ExQ2: Construction

Ref. No.	Question to	Written Question	Applicant's response
Q2.2.1	The Applicant	**Site-specific mitigation scheme** On a without prejudice basis, can you draft wording for an additional requirement in Schedule 2 of the dDCO [REP4-005] that would provide a site-specific scheme in respect of the occupiers of Tyddyn Meredydd that would mitigate the impacts of construction activities arising from those works including noise, vibration, dust and visual effects (including from all artificial lighting). As a reference you are directed to The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, Schedule 3, Article 19(1), (3) and (4).	The Applicant does not consider it necessary or appropriate to prepare a without prejudice requirement for the dDCO for Tyddyn Meredydd as it considers that appropriate mitigation measures are secured through the existing requirements of the dDCO and the related management plans. These measures ensure that the amenity of all properties in the vicinity of the Mona Onshore Development Area are appropriately protected. The Applicant has prepared a clarification note (Code of Construction Practice Controls for Tyddyn Meredydd (S_D5_26)) which highlights the relevant parts of the Code of Construction Practice and associated management plans containing details applicable to the Tyddyn Meredydd property and all others in the vicinity of the Mona Onshore Development Area. All of those details will be included within final management plans for the relevant stage of the onshore works submitted to the local planning authority for approval and suitable controls will therefore be in place in relation to impacts on Tyddyn Meredydd. The mitigation which will be relevant to Tyddyn Meredydd is all industry standard mitigation which would be applied and there is no justification for a specific requirement for this particular property with its own management plan when suitable controls are provided for in the overarching management plans. The Applicant reiterates that no significant construction effects have been identified in relation to Tyddyn Meredydd and the local authority has not raised concerns with the approach that has been taken by the Applicant to the assessment of impacts on this property and the securing of mitigation. This case is therefore distinguished from the Travellers' Encampment referred to in The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, Schedule 3, Article 19(1), (3) and (4). In that case the Applicant understands from reviewing the relevant examination documents that the Travellers' Encampment fell within the Order Limits with works being undertaken surrounding and overhead giving rise to direct interactions. It appeared to be the case that noise and vibration impacts were considered to give rise to significant effects, in particular because of the nature of the specific residential dwellings (i.e. caravans) having higher sensitivity to noise and vibration. Further, the local authority did not agree with the assessment carried out by the applicant. Those appeared to be strong reasons supporting the inclusion of a site-specific mitigation scheme, but those circumstances are not applicable in this case. The Applicant has committed to ongoing, direct liaison with the owners of Tyddyn Meredydd through the remainder of the Examination and will continue this dialogue in

Ref. No.	Question to	Written Question	Applicant's response
			the period leading up to – and during – the construction phase of the project, providing timely information and updates on any activity potentially affecting the property. Further communication and engagement will take place on an ongoing basis under the provisions of the Communications Plan (see the Outline Communications Plan (REP2-046)) that will be part of the Mona Offshore Wind Project's Code of Construction Practice.

2.4 Civil and Military Aviation and Defence Interests

Table 2.4: Response to ExQ2: Civil and Military Aviation and Defence Interests

Ref. No.	Question to	Written Question	Applicant's response
Q2.3.4	The Applicant	Liverpool Airport Primary Surveillance Radar (PSR) Regardless of whether Liverpool Airport has engaged with this Examination, the ExA will need to reach a finding on the likely significant adverse effects to the Liverpool Airport PSR identified in the ES [APP-075].	The Applicant has identified that there is potential for significant adverse technical effects on the Liverpool Airport Primary Surveillance Radar (PSR), as previously outlined in the Applicant's response to Q1.3.5 of ExQ1 (REP3-062), and detailed in Volume 4, Chapter 1: Aviation and radar (APP-075) and Appendix B of Volume 8, Annex 1.1: Aviation and radar technical report (APP-181). The Applicant emphasises that it is for Liverpool Airport to clearly define any operational effect to its Air Traffic Service (ATS) provision in light of the Applicant's assessment of technical effects on the Liverpool Airport PSR. It is not possible for the Applicant (or any other third party) to define the resulting operational effect to the Airport's ATS provision; this must be undertaken by the Airport itself to accord with Civil Aviation Authority (CAA) guidance. The Applicant wrote to Liverpool Airport on the following occasions: 16 April 2024 - to inform the airport that the Mona Offshore Wind Project application had been accepted and that the airport could register as an interested party 24 June 2024 - to note that the airport had not registered as an interested party or submitted a relevant representation. The Applicant inquired whether this meant that the airport had no objection to the proposal 26 September 2024 – attempt to re-engage for ExQ1 26 November 2024 – attempt to re-engage following ExQ2 Following the Applicant's most recent attempt to re-engage, Liverpool Airport responded on the 28 November to state that it has engaged with its PSR supplier, Raytheon, to establish whether Mona Offshore Wind Project could present an operational effect on its ATS. At the time of writing, the Applicant is seeking to secure a meeting during w/c 2 December to discuss any project data required by the Liverpool Airport, timescales for completion of their assessment and basis for a commercial agreement, should mitigation be required. The Applicant will provide an update during the hearings on 10 and 11 December.

Ref. No.	Question to	Written Question	Applicant's response
		• Noting your responses to ExQ1.3.5 and 1.3.6 [REP3-062] that without engagement with Liverpool Airport a mitigation solution is not able to be progressed, to what extent do you consider that the Proposed Development complies with Section 5.5 of NPS EN-1 and particularly paras 5.5.43 and 5.5.50?	Notwithstanding the update in Q2.3.4 above that the Applicant has now re-engaged with Liverpool Airport, the Applicant considers that the Mona Offshore Wind Project complies with Section 5.5 of NPS EN-1, specifically paragraph 5.5.43, which states that "*The applicant should include appropriate mitigation measures as an integral part of the proposed development*." and paragraph 5.5.50 "*In particular, the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes and that realistically achievable mitigation is carried out on existing surveillance systems such as radar/tracking technologies. It is incumbent on Operators of aerodromes to regularly review the possibility of agreeing to make reasonable changes to operational procedures.*". The Applicant has developed appropriate mitigation where engagement from operators of aerodromes has been forthcoming. An element of the mitigation proposed with NATS is the provision of Large Blanking with the support of an Airspace change procedure for Primary Surveillance Radars operated by NATS (see Mona and NATS (En Route) plc SoCG (REP3-029)). This is an integral part of the Mona Offshore Wind Project's radar mitigation suite, and would reduce the significance of operational effects to the Liverpool Airport ATS provision to negligible by allowing the provision of an ATS in that area, by Liverpool Airport, through Secondary Surveillance Radar (SSR). However, Liverpool Airport has now re-engaged with the Applicant and explained that it is liaising with its PSR supplier, Raytheon, to determine any mitigation requirements. Liverpool Airport anticipate that adjustments to the PSR may be required. As stated in the response to Q2.3.4 above, the Applicant has requested a meeting in w/c 2 December to discuss any project data required by the Liverpool Airport, timescales for completion of their assessment and basis for a commercial agreement, should mitigation be required. The Applicant will provide an update during the hearings on 10 and 11 December.
		• How do you intend to secure mitigation for the potential significant effects on Liverpool Airport PSR, if it is required?	As set out above, Liverpool Airport has now re-engaged with the Applicant and is seeking to determine whether Mona Offshore Wind Project could affect their ATS. Should mitigation be needed, this would be secured through a requirement in the DCO and, if necessary, agreements directly with the Airport to supplement that requirement.
		• The ExA reiterates its request in ExQ1.3.5 [PD-013] for final positions by Deadline 7.	Noted. The Applicant will liaise with Liverpool Airport with the aim of submitting a joint position statement at Deadline 7.

2.5 Climate Change and Greenhouse Gas Emissions

Table 2.5: Response to ExQ2: Climate Change and Greenhouse Gas Emissions

Ref. No.	Question to	Written Question	Applicant's response
Q2.4.1	The Applicant	**Carbon Emissions Assessment** Can the Applicant confirm if the recent high court ruling Friends of the Earth Ltd & South Lakeland Action on Climate Change vs SSLUHC has any implications for the assessment of carbon emissions undertaken in Chapter 2.10 of [APP-076]. • Is any further analysis of carbon emissions downstream of the project required? • Would consideration need to be given to outage periods where other electricity generating sources producing direct carbon emissions (e.g. gas) may be required to compensate for the electricity produced by Mona?	The Applicant does not consider that the recent high court ruling *Friends of the Earth Ltd & South Lakeland Action on Climate Change vs SSLUHC* [2024] EWHC 2349 (the FoE Case) has any implications for the assessment of carbon emissions undertaken in Volume 4, Chapter 2: Climate change (APP-076). The Applicant has undertaken its Environmental Impact Assessment (EIA) in accordance with the principles of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 2017 Regulations). The 2017 Regulations specify that "*The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors… land, soil, water, air and climate"* (Regulation 5(2)(c)). The EIA process therefore requires the identification of potential likely significant effects before assessing whether the project in question would give rise to those likely significant effects. The output of that assessment in this case has been the Environmental Statement, in particular Volume 4, Chapter 2: Climate change (APP-076). Volume 4, Chapter 2: Climate change (APP-076) suitably assesses the carbon emissions arising from the Mona Offshore Wind Project. In respect of the operations and maintenance period, which is the focus of this question, the impact of greenhouse gas emissions arising from the consumption of materials and activities required to facilitate the operations and maintenance of the Mona Offshore Wind Project and estimated abatement of UK Grid emissions as well as the impact of the effects of climate change on the Mona Offshore Wind Project onshore and offshore infrastructure through the operations and maintenance phase have been assessed. It is notable that the FoE Case also draws on the recent decision of *R (Finch on behalf of the Weald Action Group) v Surrey County Council* [2024] UKSC 20 (the Finch Case). Both the FoE Case and Finch Case consider whether adequate EIA was carried out in respect of climate change impacts from carbon-emitting fuels (coal and oil, respectively) and the subsequent combustion of those fuels. The position in those case can immediately be distinguished, therefore, from the Mona Offshore Wind Project by virtue of the fact that the Mona Offshore Wind Project is an entirely renewable development and will provide energy which is generated through renewable means, rather than through the combustion of fuels. In the FoE Case, the decision was held to be unlawful by the High Court on the basis of a number of points. Of most relevance for this question was a point centred on the EIA not having suitably assessed the indirect effects of the development on climate change. This was because downstream effects on climate change of burning the extracted coal had not

Ref. No.	Question to	Written Question	Applicant's response
			been assessed and it was held that the burning of the coal was an inevitable consequence of its extraction. There was therefore enough of a connection between the project being developed and the effect of the burning the coal to be extracted. For the Mona Offshore Wind Project, it is not possible to make a causal link between the generation of energy through the development and any increase or decrease of carbon emissions as a result of downstream use. There is no inevitability around the use of the energy generated by the Mona Offshore Wind Project (as there would have been from the burning of coal in the FoE case) and it would not therefore be possible to determine whether there is a likely significant effects (either positive or negative) as a result. The impact-receptor-effect pathway is simply too intangible for there to be any identification or assessment of the likely significant effects. In respect of the second question, the production of energy in the UK is not a zero sum game. It is a complex system of balancing and storage with a range of different sources being draw upon at any one time to meet demand. However, the operation and maintenance phase assessment presented in Volume 4, Chapter 2: Climate Change (APP-076) has considered the avoided emissions (user emissions) as a result of the Mona Offshore Wind Project. This has considered two scenarios 1) long run marginal which accounts for future decarbonisation of the grid in line with policy, and 2) current grid average which represents a static baseline and covers the ExA's scenario. The purpose behind the Mona Offshore Wind Project is to supply renewable (zero carbon) energy to assets and as such the emissions associated with those assets use of said energy would be 0 and is accounted for in the Applicant's emission calculations.

2.6 Commercial Fisheries, Fish and Shellfish

Table 2.6: Response to ExQ2: Commercial Fisheries, Fish and Shellfish

Ref. No.	Question to	Written Question	Applicant's response
Q2.5.1	The Applicant Welsh Government	Welsh Policy Can you advise if and how the Proposed Development aligns with The Welsh National Marine Plan and: • ECON_01: Sustainable economic growth; and • FIS_01: Fisheries	The Applicant confirms that the Proposed Development aligns with Welsh National Marine Plan (WNMP) policies ECON_01 and FIS_01. Detailed responses explaining how the Applicant has addressed the specific requirements outlined in policies ECON_01 and FIS_01 have been provided below in Annex 1 - Q2.5.1 Welsh Policy.
Q2.5.2	The Applicant	**Inter-related Effects – Offshore** The impacts identified in Chapter 6 (Vol 2) Commercial Fisheries [APP-058] includes: • Displacement of fishing activity into other areas where other vessels are active having an impact. However, Table 11.11 in Chapter 11 (Vol 2) Inter-related Effects – Offshore [APP-063] is for: • Displacement of fishing activity into other areas. Can you clarify why inter-related effects does not reference to the additional text “to where other vessels are active having an impact”.	The Applicant acknowledges the ExA’s observation regarding the approach to assessing displacement into other areas as outlined in section 6.8.3 of Volume 2, Chapter 6: Commercial Fisheries (APP-058). Specifically, the Applicant notes that the assessment considers the scenario where fishing activity may be displaced into areas where other vessels are active, potentially leading to gear conflict. To clarify, it is important to distinguish between the two sections of Table 11.11 in Volume 2, Chapter 11: Inter-related effects – Offshore (APP-063), which relate to inter-related effects on commercial fisheries: • Project lifetime effects • Receptor-led effects. In the context of project lifetime effects, the ExA’s observation is correct that this section of the inter-related effects assessment focuses primarily on the direct displacement of commercial fishing activity from the project area and does not explicitly reference the impacts of such displacement into other areas where fishing exists. This approach is taken because this section emphasises that displacement would be minimal in both extent and duration throughout the project lifetime, owing to the Applicant's commitments during construction, operations and maintenance, and decommissioning phases. Commitments are set out within Table 1.2 of the Outline Fisheries Liaison and Co-existence Plan (OFLCP) (REP3-016) and the Mitigation and monitoring schedule (REP4-013). The commitments are designed to enable co-existence as far as possible during all project phases. They include commitments to not close the entire development area during the construction phase, the establishment of a Scallop Mitigation Zone (SMZ), which will be free of wind turbines and offshore substation platforms (a commitment which is a ‘first’ for offshore wind in the United Kingdom as far as the Applicant is aware)

Ref. No.	Question to	Written Question	Applicant's response
			and the orientation and spacing of infrastructure such that fishing can continue within the Mona Array Area. In contrast, it is important to note that the receptor-led effects section of the inter-related effects assessment does explicitly address the potential for gear conflict resulting from displacement into areas where other fishing activity occurs. This section discusses the potential inter-related effects arising from the combination of restricted or lost access to fishing grounds and the subsequent displacement of activity into other areas. The Applicant considers that this section is the appropriate context for discussing gear conflict and refers the ExA to it for more details.
Q2.5.3	The Applicant	**Cumulatively assessment** Can you advise why supply chain opportunities for local fishing vessels appears as an impact in the cumulatively assessment but does not appear in the project alone impacts identified in Chapter 6 (Vol 2) Commercial Fisheries [APP-058].	For clarity, the Applicant confirms that supply chain opportunities for local fishing vessels have been assessed on commercial fisheries receptor groups within Volume 2, Chapter 6: Commercial Fisheries (APP-058) for the Mona Offshore Wind Project alone, as detailed in section 6.8.8. However, this impact was not carried forward into the Cumulative Effects Assessment (CEA). The range of potential cumulative impacts for commercial fisheries is identified in Table 6.34 of Volume 2, Chapter 6: Commercial Fisheries (APP-058) and is a subset of those considered for the Mona Offshore Wind Project alone. As described in paragraph 6.9.1.5 of section 6.9.1, CEA Methodology of Volume 2, Chapter 6: Commercial Fisheries (APP-058), where the potential significant effect for the Mona Offshore Wind Project alone on commercial fisheries receptors is assessed as negligible or where an impact is predicted to be highly localised, these have not been considered within the CEA, as there is not considered to be a potential for cumulative effects with other plans, projects or activities.
Q2.5.4	The Applicant	**Cumulatively assessment** Can you summarise your assessment of cumulative assessment impacts related to Isle of Man fisheries.	As per the Applicant's response to Q2.5.3 above, where the potential significant effects for the Mona Offshore Wind Project alone on commercial fisheries receptors is assessed as negligible or where an impact is predicted to be highly localised, these have not been considered within the CEA, as there is not considered to be a potential for cumulative effects with other plans, projects or activities. The Applicant highlights that the potential for significant effects for the Mona Offshore Wind Project alone on the Isle of Man scallop fleet, across all phases, is assessed in Volume 2, Chapter 6: Commercial Fisheries (APP-058) as negligible significance for the following impacts: • Section 6.8.2: Loss or restricted access to fishing grounds • Section 6.8.3: Displacement of fishing activity into other areas • Section 6.8.4: Interference with fishing activity • Section 6.8.5: Temporary increase in steaming distances

Ref. No.	Question to	Written Question	Applicant's response
			• Section 6.8.6: Loss or damage to fishing gear due to snagging • Section 6.8.7: Potential impacts on commercially important fish and shellfish resources. Consequently, cumulative effects with other plans, projects, or activities on this receptor group are not anticipated.
Q2.5.5	The Applicant	**Monitoring** Can you explain how you satisfy NPS EN-3 paragraph 2.8.247 which notes that it is unknown whether exposure to multiple cables and larger capacity cables may have a cumulative impact on sensitive species and that monitoring EMF emissions can provide the evidence to inform future EIAs.	The Applicant refers the Examining Authority to the response to Q2.5.15 below.
Q2.5.6	*Scottish Fishermen's Federation,* *Scottish Whitefish Producers Association Limited,* *West Coast Sea Products Ltd* *Bodorgan Marine Limited*	***Mitigation and monitoring measures*** *If you are not satisfied with the commercial fisheries measures being put forward by the Applicant and captured in Mitigation and Monitoring Schedule [REP4-013] can you indicate what mitigation and monitoring is required with a summary of reasons.*	The Applicant would note that its commitment to pre and post-construction scallop monitoring made through the updated OFLCP (J13 F02) submitted at Deadline 3, has now been secured through the updates to the Offshore In-principle Monitoring Plan (OIPMP) (J15 F02) submitted at Deadline 5.
Q2.5.7	The Applicant	**Mitigation and monitoring measures** Can you summarise how you satisfy NPS EN-3 paragraph 2.8.251 'Mitigation should be designed to enhance, where reasonably possible, any potential medium and long-term positive benefits to the fishing industry, commercial fish stocks and the marine environment'.	The Applicant acknowledges the ExA's question and notes that this query was raised by Bodorgan Marine Ltd in IP Submission (REP4-113), to which the Applicant has also responded and refers to the ExA for further details (paragraph REP4-113.5 of S_D5_4). Firstly, it is important to recognise that paragraph 2.8.251 of the NPS EN-3 forms part of the broader context of mitigation policy outlined in the document. The Applicant emphasises that the Mona Offshore Wind Project has adhered to overarching mitigation policy obligations set out in paragraphs 2.8.213 to 2.8.217 of NPS EN-3. A detailed response explaining how the Applicant has addressed the specific requirements outlined in paragraph 2.8.251 of NPS-EN-3 is provided below:

Ref. No.	Question to	Written Question	Applicant's response
			Paragraph 2.8.251 of NPS EN-3 states: *Mitigation should be designed to enhance, where reasonably possible, any potential medium and long-term positive benefits to the fishing industry, commercial fish stocks and the marine environment.,* the Applicant acknowledges the policy aim of enhancement of commercial fisheries in the mitigation design process. However, the phrase "*where reasonably possible*" recognises that achieving such enhancements may in practice be limited. The specific policy wording ensures that, while the enhancement of fisheries should be considered when developing mitigation, it should be balanced with the feasibility of implementation within the context of specific project and environmental conditions. Consultation with commercial fisheries stakeholders has been ongoing since 2021, as summarised in Table 6.5 of Volume 2, Chapter 6: Commercial fisheries (APP-058) and detailed in Appendix H of the Technical Engagement Plan Appendices - Part 2 (F to M) (APP-042). This has included post-EIA scoping discussions in Autumn 2022 on specific mitigation design requirements to allow access to and continued fishing within the Mona Array Area and Mona Offshore Cable Corridor. Whilst the development of these mitigation measures has focused on the key existing fisheries in these areas, including UK and non-UK vessels targeting queen scallops and static gear (potting) vessels, measures have also been developed with due consideration of other fisheries active in this region. A key focus of this engagement was consideration of the need for avoidance of infrastructure over core queen scallop grounds, sufficient spacing between infrastructure to allow continued access and fishing, orientation of wind turbines with dominant towing directions, burying of cables and minimising the use of cable protection. In winter 2022, further engagement was undertaken specifically with scallop fishing stakeholders on the potential for a SMZ. The commitment to a SMZ was subsequently included in the OFLCP (REP3-016). The Applicant acknowledges that the nature of the proposed mitigation presents limited opportunities for enhancement. However, the Applicant is considering potential opportunities for intertidal and offshore biodiversity enhancement, which have the potential to benefit fish and shellfish ecology receptors (see section 3.6 of the Biodiversity Benefit and Green Infrastructure Statement (APP-193) and HAP_ISH4_1 of the Applicant's response October Hearing Action Points (REP4-036)). Due to the importance of parts of the Mona Array Area and Offshore Cable Corridor to vessels targeting queen scallops, discussions regarding mitigation have been focused on this fishery. Similar discussions have also been held with respect to other commercial fisheries receptor groups active in this area, including static gear (potting) vessels. While these discussions have primarily centred on these fisheries, the Applicant has made significant

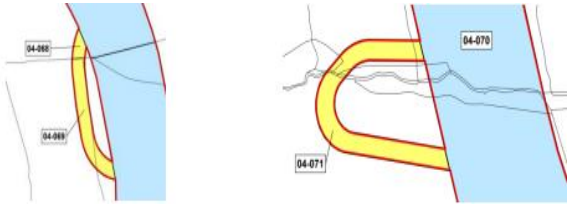
Ref. No.	Question to	Written Question	Applicant's response
			commitments to all commercial fisheries receptor groups in the design of the project to facilitate co-existence and co-location and to enable continued fishing activity within the Mona Array Area and Offshore Export Cable Corridor (as presented within Table 1.2 of the OFLCP (REP3-016)). For these reasons, the Applicant considers that it has satisfied the policy set out in NPS EN-3 by ensuring that reasonable opportunities for enhancement have been explored whilst having due regard to practical constraints.
Q2.5.8	The Applicant	**Significance of Effects** Can you clarify why Table 3.34: Summary of potential environmental effects, mitigation and monitoring [APP-055] does not appear to state the significance of effect for shellfish. For example: i) the significance of effect for construction and decommissioning phases is not stated for underwater sound impacting shellfish; and ii) ii) the significance of effect for the operation phase is not stated for Electromagnetic Fields (EMF) from subsea electrical cabling impacting shellfish.	The Applicant clarifies that the range of sensitivities and significances under the 'Marine' species in Table 3.34 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055) includes shellfish species.
Q2.5.9	The Applicant	**Significance of Effects** Can you clarify why Table 3.35: Summary of potential cumulative environmental effects, mitigation and monitoring [APP-055] does not appear to state the significance of effects for the groups of Important Ecological Features indicated in Table 3.14 [APP-055] i.e. marine, shellfish and diadromous.	The Applicant clarifies that Table 3.35 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055) is a summary table which covers the ranges of sensitivity for all receptors (including those Important Ecological Features identified in Table 3.14), with groupings chosen to keep the table brief and readable.
Q2.5.10	The Applicant	**Tier 1 Impacts** Can you clarify why Table 3.35: Summary of potential cumulative environmental effects, mitigation and monitoring [APP-055] does not identify Tier 1 impacts related to increased suspended sediment concentrations (SSCs) and	The Applicant has checked Table 3.35 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), and the conclusions for both impacts are summarised for Tier 1 impacts (Increased SSCs and associated sediment deposition on page 227 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), and the Introduction of artificial structures and colonisation of hard structures on page 228).

Ref. No.	Question to	Written Question	Applicant's response
		associated sediment deposition; and introduction of artificial structures and colonisation of hard structures.	
Q2.5.14	*NRW A*	***Cod and Herring*** *Can you provide an update regarding cod and herring issues and summarise any remaining principal points of disagreement including any monitoring requirements.*	The Applicant is working with Natural Resources Wales (Advisory) (NRW (A)) on an updated SoCG and has had a number of productive meetings on outstanding matters. In relation to herring, there are no outstanding points of disagreement. Regarding potential impacts on cod. the Applicant has provided updates to the Underwater Sound Management Strategy (UWSMS) (J16 F02) at Deadline 5 to address NRW (A)'s concerns in relation to effects of piling on cod spawning, with detail provided to narrow the potential range of spawning dates, and consideration of a range of sound abatement options. The UWSMS (J16 F02) also makes a specific commitment to considering a seasonal restriction covering the peak spawning period (February to March inclusive) in the final UWSMS, with this to be further refined and discussed with all relevant stakeholders post consent. Both the Applicant and NRW (A) agree that the UWSMS is the best way to manage underwater noise impacts from piling during the construction and agree to work collaboratively on this post consent, and updates to the UWSMS submitted at Deadline 5 (J16 F02) will close outstanding points of disagreement with NRW (A). There is a remaining disagreement on the conclusions of the impact assessment with respect to cod spawning for the project alone. The Applicant maintains the position that the project will not result in significant effects on cod spawning when considered alone, but a moderate significant effect has been predicted when the project is considered cumulatively with other projects; NRW have residual concerns that piling noise from the project alone will result in significant effects on cod spawning. In any case, the Applicant has acknowledged the risk of underwater sound impacts to spawning cod and, as such, cod was specifically included as a key species within the UWSMS at the application stage, with further refinements at Deadline 5 to address NRW (A)'s concerns as detailed above (J16 F02). The aim of this is to manage the effects of underwater sound on spawning cod with mitigation focused on the management of contributions to cumulative underwater sound inputs by the Mona Offshore Wind Project. As such, these measures will likewise manage effects on cod due to the Mona Offshore Wind Project alone. The Applicant anticipates that this position will be recorded in the final SoCG as 'not agreed – not material', in light of the updates made to the UWSMS. NRW (A) will be consulted throughout the development of the final UWSMS, and approval from NRW, as the licencing authority, will be required to discharge the consent condition related to the UWSMS. This ensures that concerns regarding underwater sound impacts can be fully addressed with appropriate and proportionate measures

Ref. No.	Question to	Written Question	Applicant's response
			implemented, where necessary, based upon the final project design and construction schedule and taking account of underwater sound policy at that time.
Q2.5.15	The Applicant	**Electro-magnetic fields** NPS EN-3 paragraph 2.8.247 states 'it is unknown whether exposure to multiple cables and larger capacity cables may have a cumulative impact on sensitive species. It is therefore important to monitor EMF emissions which may provide the evidence to inform future EIAs'. Can you explain how you satisfy this particular paragraph.	The Applicant has currently planned no future monitoring for the impacts of EMFs on fish and shellfish ecology (Volume 2, Chapter 3: Fish and Shellfish Ecology (APP-055), Section 3.11.9). Specifically, the assessment presented in Section 3.9.6 of Volume 2, Chapter 3: Fish and Shellfish Ecology (APP-055) indicate that both fish and shellfish receptors can detect magnetic fields, with a range of small scale minor behavioural responses at the individual level (Table 3.29, Volume 2, Chapter 3: Fish and Shellfish Ecology APP-055). However, the evidence to date from laboratory and field studies has indicated no significant population-level effects on any investigated fish or shellfish species. On a broader scale, analysis of the data from monitoring surveys of fish and shellfish populations across a number of Belgian offshore wind farms has shown that fish assemblages undergo no significant or drastic changes due to the presence of offshore wind farm infrastructure (Degraer *et al*., 2020), with some increases in soft sediment associated fish species such as solenette and common dragonet (Paragraph 3.9.5.14, Volume 2, Chapter 3: Fish and Shellfish Ecology (APP-055)). However, the Applicant would note that there are wider developing and ongoing industry workstreams to investigate this topic. Specifically, this includes outputs of a recent workshop and subsequent report by The Crown Estate and Cefas on advancing the understanding of interactions between subsea power cables and the marine environment, as part of the Offshore Wind Evidence and Change Programme. This included a number of recommendations (see Gill *et al*., 2023) including potential data sharing of records including power variability and burial depths while taking account of the confidentiality of sensitive information, and access between developers and research organisations and developing a strategic approach to validate current models of the effects of EMFs. Further research into the same matter has also been proposed by ScotMER, with a range of potential research opportunities suggested (ScotMER, 2022). The Applicant is actively engaged with The Crown Estate on the Offshore Wind Evidence and Change Programme and will therefore engage with any information requests such as those discussed above within that forum. Specific to the Mona Offshore Wind Project, further rationale for not proposing further monitoring beyond the Offshore In-Principle Monitoring Plan (J15 F02) has been explained in HAP_ISH4_09 and HAP_ISH4_10 (The Applicant's Response to October Hearing Action Points REP4-036). The Applicant maintains the position that the monitoring put forward is proportionate and in line with industry best practice for project specific monitoring. Further detail on this position is provided in the response to Q2.17.3.

2.7 Compulsory Acquistion (CA) and Temporary Possession (TP)

Table 2.7: Response to ExQ2: Compulsory Acquistion and Temporary Possession

Ref. No.	Question to	Written Question	Applicant's response
Q2.6.1	The Applicant	**Securing access to land during construction phase** Where “islands” or pockets of land would be surrounded by land over which you are seeking CA or TP, see illustrative examples below, what provision would be made for owners’/occupiers’ continued access to and use of that land? How would this be secured in the dDCO? 	Where land parcels are severed as a result of the land take, the Outline Code of Construction Practice (REP4-023) secures an Agricultural Liaison Officer (ALO), who will be appointed as the point of contact for landowners, occupiers and their agents to discuss practical matters which would affect day to day farming operations. These discussions will include access requirements to access field entrances and determine crossing points across the Order Limits, in particular to severed land parcels to ensure landowner access is maintained.
Q2.6.2	*SP Manweb PLC*	***Protective provisions*** *At CAH1 [EV-008] and ISH5 [EV-007] the Applicant said that protective provisions had been agreed between the parties, that the dDCO [REP4-005] would be updated accordingly at Deadline 4 and that thereafter you would write to advise that your representation is being withdrawn [PDA-049]. The Applicant’s subsequently updated Land Rights Tracker [REP4-091] advises that a drafting point needs to be resolved between the parties before the dDCO is updated accordingly.* • *From your perspective, is that a correct summary of where the parties stand?* • *Can you confirm that agreement of protective provisions will resolve your outstanding objections? If not, what further agreement(s) are required?*	The Applicant notes that the protective provisions included in Schedule 10, Part 4 of the draft Development Consent Order (C1 F06) at Deadline 5 have been agreed by SP Manweb. The Applicant understands that SP Manweb will write directly to the Examining Authority to confirm this.

Ref. No.	Question to	Written Question	Applicant's response
		• *Whilst noting your submitted draft protective provisions [REP3-106], if you have not reached agreement thereon with the Applicant by Deadline 5, please submit an explanation of areas of disagreement, reasons why and by annotating Part 4, Schedule 10 of the dDCO [REP4-005] indicate what specific changes need to be made in order to address them.*	
Q2.6.3	*Wales and West Utilities*	***Protective provisions*** *At ISH5 [EV-007] the Applicant said that your legal representatives had advised that they were seeking instruction from you in respect of proposed amendments to the protective provisions included in Part 5, Schedule 10 of the dDCO [REP4-005]. In its Land Rights Tracker [REP3-076] it advised that agreement been the parties was expected before the close of Examination.* • *From your perspective, is that a correct summary of where the parties stand?* • *Can you confirm that agreement of protective provisions will resolve your outstanding objections? If not, what further agreement(s) are required?* • *If you have not reached agreement with the Applicant on protective provisions by Deadline 5, please submit an explanation of areas of disagreement, reasons why and by annotating Part 5, Schedule 10 of the dDCO [REP4-005] indicate what specific changes need to be made in order to address them.*	The Applicant refers to Appendix to ExQ2, Question 2.6.9 Response regarding Statutory Undertakers (S_D5_32.1) detailing the Applicant's representations on these issues.
Q2.6.4	*Welsh Ministers as Strategic*	***Protective provisions & voluntary agreement***	The Applicant notes that the protective provisions included in Schedule 10, Part 6 of the draft Development Consent Order (C1 F06) at Deadline 5 have been agreed by Welsh

Ref. No.	Question to	Written Question	Applicant's response
	Highway Authority	*At CAH1 [EV-008] and ISH5 [EV-007] the Applicant advised that it is very close to reaching an agreement with you on proposed protective provisions. In its Land Rights Tracker [REP4-091] it said that it expects to reach agreement with you on protective provisions 'shortly'.* • *From your perspective, is that a correct summary of where the parties stand?* • *In respect of land rights that the Applicant seeks to acquire from you, do you envisage that you will reach voluntary agreement with the Applicant before the close of Examination?* • *If you have not reached agreement with the Applicant on protective provisions by Deadline 5, please submit an explanation of areas of disagreement, reasons why and by annotating Part 6, Schedule 10 of the dDCO [REP4-005] indicate what specific changes need to be made in order to address them.*	Ministers. The Applicant considers that there are no further outstanding matters between the parties in relation to the protective provisions. The Applicant understands that Welsh Ministers will write directly to the Examining Authority to confirm this.
Q2.6.5	*National Grid Electricity Transmission PLC*	***Protective provisions*** *At ISH5 [EV-007] the Applicant said that discussion was on-going with you on draft protective provisions and how those would apply to interactions at both the onshore sub-station and along the proposed cable corridor. In its Land Rights Tracker [REP4-091] it advised that agreement been the parties was expected before the close of Examination.* • *From your perspective, is that a correct summary of where the parties stand?* • *Can you confirm that agreement of protective provisions will resolve your outstanding objections? If not, what further agreement(s) are required?*	The Applicant refers to Appendix to ExQ2, Question 2.6.9 Response regarding Statutory Undertakers (S_D5_32.1) detailing the Applicant's representations on these issues.

Ref. No.	Question to	Written Question	Applicant's response
		• *Whilst noting that you referred in your Written Representation [REP1-055] to the protective provisions for your benefit that were included in The Awel y Môr Offshore Windfarm Order 2023, if you have not reached agreement with the Applicant on Protective Provisions by Deadline 5, please submit an explanation of areas of disagreement, reasons why and by annotating Part 7, Schedule 10 of the dDCO [REP4-005] indicate what specific changes need to be made in order to address them.*	
Q2.6.6	*Addleshaw Goddard PLC on behalf of Network Rail Infrastructure Limited*	***Protective provisions*** *At ISH5 [EV-007] the Applicant said that discussion was on-going with you on the matters raised in your WR [REP1-057] and, its Land Rights Tracker [REP4-091] it advised that agreement been the parties on all outstanding issues was expected before the close of Examination.* • *From your perspective, is that a correct summary of where the parties stand?* • *If not, what are the outstanding points of difference between you and the Applicant?* • *Looking at final section of you WR [REP1-057], please provide any update on 'Requirements in order to withdraw'.* • *If you have not reached agreement with the Applicant on protective provisions by Deadline 5, please submit an explanation of areas of disagreement, reasons why and by annotating Part 8, Schedule 10 of the dDCO [REP4-005] indicate what*	The Applicant refers to Appendix to ExQ2, Question 2.6.9 Response regarding Statutory Undertakers (S_D5_32.1) detailing the Applicant's representations on these issues.

Ref. No.	Question to	Written Question	Applicant's response
		specific changes need to be made in order to address them.	
Q2.6.7	*AyM OffshoreWind Farm Limited*	***Protective provisions** In the Applicant's response to Written Representations ([REP2-078], Table 2.4):* • *It clarified at Reference REP1-061.3 thereof and during ISH5 [EV-007] what it considers to be the extent of potentially competing land rights between the parties. With reasoning for your response, do you agree with its stance?* • *At reference REP1-061.4 it referred to review of a draft set of protective provisions and at CAH1 [EV-008] and ISH5 [EV-007] mention was made to an updated exchange between the parties. If you have not reached agreement with the Applicant on protective provisions by Deadline 5, can you advise on the wording of protective provisions that you consider would be required to avoid serious detriment to the carrying out of your undertaking?*	The Applicant refers to Appendix to ExQ2, Question 2.6.9 Response regarding Statutory Undertakers (S_D5_32.1) and the Joint Position Statement Awel y Mor (S_D5_34) detailing the Applicant's representations on these issues. The Applicant notes this is addressed to AyM Offshore Wind Limited and refers the ExA to response [S_D5_34) detailing the Applicant's representations on these issues.
Q2.6.9	The Applicant	**Planning Act 2008 (PA2008) s127 and s138 cases to satisfy the Secretary of State** At CAH1 [EV-008] you said that you would make applications under s127 and s138 of the PA2008, as required, before the close of the Examination. Where agreement has not been reached with Statutory Undertakers in advance of Deadline 5, can you please submit such applications on that date in order to facilitate Statutory Undertakers' response at Deadline 6?	The Applicant refers to Appendix to ExQ2, Question 2.6.9 Response regarding Statutory Undertakers (S_D5_32.1) detailing the Applicant's representations on these issues.
Q2.6.12	*DMPC on behalf of Mr EW Roberts*	***Mr R W Roberts*** *Can you provide an update on any negotiations with the Applicant since the Accompanied Site*	The Applicant has agreed heads of terms for the rights sought and will be progressing with the project's legal representatives shortly.

Ref. No.	Question to	Written Question	Applicant's response
		Inspection on 15 October 2024 and CAH1 [EV-008]? *Having had the chance to consider the Outline Highways Access Management Plan [APP-228] as it applies to your clients' land, what specific amendments to it do you consider are needed to address your client's concerns about the prevention of discharge of water onto the public highway?*	The Applicant has also provided a response on the discharge of water in response to the written representation from Mr Bibby on behalf of Mr Roberts which was submitted by Mr Bibby at deadline 4.
Q2.6.13	*DMPC on behalf of Mr AEM Owen & A Owen Cyf*	***Mr AEM Owen & A Owen Cyf*** *Can you provide an update on any negotiations with the Applicant since CAH1 [EV-008]?* *What agreement or assurances would the Applicant need to provide your clients with to enable them to withdraw their objection to the Proposed Development as it relates to rights the Applicant is seeking in their land?* *Over and above evidence that you have submitted on your clients' behalf in previous submissions, is there anything that you want to add in respect of the Applicant's Response to Davis Meade Property Consultants on behalf of Mr AEM Owen & A Owen ExQ1 Responses [REP4-078]?*	The Applicant is pleased to confirm the heads of terms for the land Mr Owen is the freeholder of along the cable corridor have been agreed, with legal representatives instructed to complete the corresponding option agreement. An Occupier's Consent document for the land Mr Owen tenants along the cable route (Plots 10-185; 10-186 and 10-188) was issued to Mr Owen's agent on 7th November 2024 and the Applicant awaits comments on the document issued. With regards to the land Mr Owen occupies, which is required for the onshore substation and associated mitigation, the Applicant has provided Mr Owen's agent with a simple draft form of consent and the parties are in dialogue in respect of what will be required from Mr Owen based on his current tenancy agreement. The detail for any agreement can only be confirmed once further terms have been discussed with Mr Owen's landlord (the Cefn Estate) as they are ultimately the party for any legal agreement. The Applicant is committed to continue its dialogue with Mr Owen to assist in mitigating the impact of the project on his tenanted holding.
Q2.6.15	The Applicant	**Variation of restrictive covenant** At CAH1 [EV8-002] you advised, in respect of Plot 02-024, that the restrictive covenant that it is proposed to be subject of by virtue of Schedule 8 and Article 20 of the dDCO [REP4-005] would not necessarily preclude the owners' plans for development of the land subject to your agreement. • Would such possible variation of the proposed restrictive covenant be a private legal matter between you and the	The restrictive covenant at 2.(b) for plot 02-024 set out in Schedule 8 of the draft DCO (C1 F06) states "A restrictive covenant over the land for the benefit of the remainder of the Order land to: (b) to prevent anything to be done by way of excavation of any kind in the land nor any activities which would alter, increase or decrease ground cover or soil levels by greater than one metre whatsoever without the consent in writing of the undertaker.." This restriction applies to all plots where the Applicant's works would be installed below existing infrastructure and does not affect works to the surface of the land. Any consent required to a proposed development from the landowner would be a private legal matter between the landowner/occupier and the Applicant and as long as there was no potential for an effect on the Applicant's infrastructure there would be no reason to withhold consent. There are negotiations between the parties to secure voluntary agreement, including for plot 02-024 and the Applicant is happy to liaise further on this concern as part of these negotiations.

Ref. No.	Question to	Written Question	Applicant's response
		landowner/occupier, outwith the jurisdiction of the dDCO? What recourse to adjudication would the latter have if you were not amenable to variation of the restrictive covenant to facilitate their plans for development of their land?	
Q2.6.16	The Applicant	**G Lloyd Evans & Sons** During the Accompanied Site Inspection at the farm of G Lloyd Evans & Sons, a verbal update was provided on the extent of Horizontal Directional Drilling (HDD) that had been agreed to date. Please provide a plan showing the extent of proposed HDD as it would affect the holding and advise how this would be secured through the dDCO [REP4-005].	The Applicant has put forward an offer under the Heads of Terms negotiations to the Lloyd Evans family to use trenchless techniques in a certain section of the land they farm to mitigate the potential impact on their business. The details and extent of this area have not yet been agreed. If agreement is reached between the Applicant and G Lloyd Evans & Sons, it will be captured in the voluntary agreement between the parties, and would be included in an update to the Outline Construction Method Statement to be approved by the relevant planning authority as part of the Code of Construction Practice secured through the dDCO.
Q2.6.23	*Forsters on behalf of the Executors of the Estate of the Late Sir David Watkin Williams-Wynn Bt*	***The Cefn Estate*** *Can you provide an update on the outcome of the planned meeting with the Applicant?* *If the scheduled discussion did not take place on 11 November, when it its proposed that the parties will meet?*	The Applicant confirms that the meeting with the Cefn Estate took place on November 11 2024. During the meeting, detailed information was provided regarding the land acquisition necessary to facilitate the project, along with the associated updated voluntary land agreements being sought by the Applicant. These discussions considered the points raised in recent correspondence that were previously unknown. The representatives of the Estate are expected to respond to the issued heads of terms shortly, and the Applicant looks forward to progressing the voluntary agreement, aiming to be in advanced stages of negotiation by Deadline 6.
Q2.6.24	The Applicant	**Sub-Station site** When responding to Forsters submission on behalf of the Executors of the Estate of the Late Sir David Watkin Williams-Wynn Bt [REP4-119] in respect of the sub-heading 'The scale and tenure of the land sought is not justified and the site selection process has not been adequate', can you explain how the (comparative) extent of land rights sought would comply with s122(2)(a) and (b) of PA2008 taking account of your cited evidence at ISH3 [EV5] about the site-selection process?	The Applicant's approach is to ensure that the land and rights in land to be acquired are no more than is reasonably required for the purposes of the project in accordance with the relevant legal and policy tests. The design of the Mona Offshore Wind Project has been refined following the statutory consultation to reduce the extent of land take required (see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-016). In particular, the onshore substation site has sought to reduce the physical footprint of the infrastructure (the onshore substation footprint, as discussed in Section 4.11.7 of AS-016). Therefore, demonstrating necessity and proportionality in terms of site selection and the interference with the rights of those with an interest in the land. The ecological and landscape elements associated with the mitigation of potential impacts at the onshore substation have been through Expert Working Group (EWG) discussions with statutory consultees – Denbighshire County Council and Natural Resources Wales – and both are satisfied (through the SoCG process) with the proposals put forward in the outline

Ref. No.	Question to	Written Question	Applicant's response
			Landscape and Ecological Management Plan (J22 F03). Considering the above, the Applicant considers there is a compelling case in the public interest for the authorisation of the compulsory acquisition of land and that the interference with private interests in land is justified. The Statement of Reasons (REP3-004) sets out further justification and required land for the development. With regard to the tenure sought, the Applicant has always been open to discussions regarding tenure through a voluntary agreement however, under s122 of the PA2008, the Applicant can only seek to compulsory acquire the freehold of the land required for the substation and the associated works as it will exclusively possess that land. Where lesser rights are sufficient (for example the rights and restrictions over the cable easement that do not require the acquisition of land) these are being sought instead of freehold acquisition. In addition, temporary possession powers have been included within the draft DCO to mitigate the extent of compulsory freehold acquisition and the permanent rights sought.
Q2.6.26	The Applicant	**Open Space** In your Response to CCBC and DCC ExQ1 Responses ([REP4-058], REP3-078.7) you say, in respect of Plot 01-003 that the installation of fencing would be limited to a 3-4 week cycle for each of the 4 proposed cable circuits: • Would that proposed duration be controlled by the dDCO?; and • If not, in considering whether this element of the Proposed Development would satisfy 132(3) of the PA2008, how could the Secretary of State be assured that 'only a very small section of this plot will be fenced off temporarily and for a limited period'?	The Applicant confirms that the installation of the temporary fencing on Plot 01-003 will be secured through the final Landfall Construction Method Statement, which will be agreed with the relevant planning authority (Conwy County Borough Council) tprior to commencement of these works. The commitment to define the duration of the temporary fencing has been added to the Outline Landfall Construction Method Statement (J26.14 F04) submitted at Deadline 5.

2.8 Draft Development Consent Order (dDCO)

Table 2.8: Response to ExQ2: Draft Development Consent Order (dDCO)

Ref. No.	Question to	Written Question	Applicant's response
Q2.7.1	The Applicant	**Explanatory Memorandum** Can you ensure that all points referenced in your response to October Hearing Action Points [REP4- 036] are captured within the Explanatory Memorandum due to be submitted at D5.	The Explanatory Memorandum (Document Reference C3 F04) has been updated for Deadline 5. Please also see Response to October Hearing Action Points at Deadline 5 (Document Reference S_D5_2 F01).

2.9 Flood Risk and Water Environment

Table 2.9: Response to ExQ2: Flood Risk and Water Environment

Ref. No.	Question to	Written Question	Applicant's response
Q2.8.1	The Applicant	**Additional storage areas** At Section 1.9.1.13 of the Outline CoCP [REP4-023] you refer to the possible need for additional storage areas along the Mona Onshore Cable Corridor, Mona 400kV Grid Connection Cable Corridor and at the Onshore Substation. In Section 1.9.1.13 you add that their location 'will be sited away from watercourses and flood zones where possible' (ExA emphasis). If needed, would their precise location be subject of Requirement 9(1) of the dDCO [REP4-005]?	The Applicant notes that the need for additional storage areas along the Onshore Cable Corridor will be determined during detailed design. The storage areas will be located within the Order LImits and away from watercourses and flood zones where possible, however their precise locations will be identified in the final Code of Construction Practice (CoCP). The CoCP is secured in Requirement 9(1) of the DCO and will be agreed with the relevant planning authority through the discharge process.
Q2.8.2	The Applicant Tan-y-Mynydd Trout Fishery Limited	**Tan-y-Mynydd Trout Fishery Limited** Can you provide an update on dialogue between the Applicant and Tan-y-Mynydd Trout Fishery Limited.	The Applicant has set up regular six weekly meetings with Tan-y-Mynydd Trout Fishery, with the next meeting due to take place on 4th December 2024. These calls ensure there is a direct point of contact to discuss concerns raised and address queries. The main agenda items for this call cover the monitoring currently being completed on the boreholes and details of the assessment of risk associated with the Fishery, which will determine the proposals to monitor the fishery water sources. Since the initial concerns were raised (REP1-080), the Applicant has been in the undertaking work associated with the hydrology risk assessment. It is expected the data from the assessment will be available over the next couple of months, and will discuss the findings with Tan-y-Mynydd Trout Fishery, this will facilitate discussions on mitigating measures or losses that may be expected as a direct result of the works.
Q2.8.3	The Applicant	**Tan-y-Mynydd Trout Fishery Limited** With reference to evidence to support your response, do you accept that there is the potential for the construction of the onshore cable route to impact on the water supply to the fishery?	In its response to REP3-107.2 (REP4-080), the Applicant explained that it has undertaken a Hydrogeological Risk Assessment to confirm the low risk of an adverse impact from the Mona Offshore Wind Project's construction activities on the Tan y Mynydd Trout Fishery, which is based on a review of geological and hydrogeological data collected from the boreholes installed during its initial site investigations. The Hydrogeological Risk Assessment will be submitted into Examination at Deadline 6.
Q2.8.4	The Applicant	**Tan-y-Mynydd Trout Fishery Limited**	The Applicant can confirm that approximately five boreholes have been installed within the Onshore Cable Corridor in the likely catchment area of the springs at the Tan-y-Mynydd

Ref. No.	Question to	Written Question	Applicant's response
		In your Response to the Examining Authority's written questions (ExQ1) ([REP3-062], Q1.21.11) you said that water monitoring is taking place. Can you give any update on the nature of that water monitoring and when the outcomes will be known and submitted into the Examination? Additionally, you stated that construction impacts would be managed through the the CoCP. Could you outline the measures in the outline CoCP or its appended outline management plans that would manage potential effects on hydrology and specifically on the water supply to the Fishery?	Trout Fishery. The likely catchment area was identified from the topography, ground elevation and location of surface watercourses. The boreholes were subject to geological assessment and three rounds of monitoring (in terms of groundwater levels and groundwater quality). The findings of this monitoring have been used to inform the Hydrogeological Risk Assessment, which will be submitted into the Examination at Deadline 6. Four of the boreholes have been retained to provide information to demonstrate that the construction activities of the Mona Offshore Wind Project do not have an attributable effect on the groundwater quantity and quality at Tan-y-Mynydd Trout Fishery. Construction impacts will be managed through the implementation of measures set out in the CoCP and its associated management plans. These standard measures will seek to minimise the level of contaminants being generated; prevent contaminated runoff from moving to a watercourse; capture, treat and control the discharge of construction runoff; and maintain silt control and drainage measures to ensure they remain effective. The approach to managing these impacts (including examples of control measures) is set out in sections 1.6 and 1.7 of the Outline Construction Surface Water and Drainage Management Plan (J26.6 REP2-050). Specific measures will be defined during the detailed design and will be informed by the Hydrogeological Risk Assessment and hydrogeological conceptual model. The measures will be set out in the final Construction Surface Water and Drainage Management Plan and will be agreed with the relevant planning authority. The Construction Surface Water and Drainage Management Plan forms part of the CoCP, which is secured as a requirement of the DCO.
Q2.8.5	The Applicant Tan-y-Mynydd Trout Fishery Limited	**Tan-y-Mynydd Trout Fishery Limited** The Outline Construction Surface Water Drainage Management Plan (OCSWDMP) ([APP-218], Section 1.2.1.2) sets out the 'key management and monitoring procedures in relation to surface water and drainage that will be required during construction' of the Proposed Development - does this adequately cover the issues being raised by the Fishery?	Section 1.9 of the Outline Surface Water and Drainage Management Plan (REP2-050) sets out the commitment to undertake monitoring at agreed locations throughout the construction phase of the Mona Offshore Wind Project. The monitoring to date has been undertaken to characterise the hydrogeological baseline. Specific monitoring will be undertaken during construction to confirm the predicted absence of an effect on the water supply to the Tan-y-Mynydd Trout Fishery that is attributable to the activities of the Mona Offshore Wind Project. The monitoring will be designed to meet this objective: the scope and locations of the monitoring will be determined during detailed design and will be appropriate to the location and the findings of the Hydrogeological Risk Assessment.
Q2.8.6	The Applicant Tan-y-Mynydd Trout Fishery Limited	**Tan-y-Mynydd Trout Fishery Limited** Is any additional commitment required in the outline CoCP, OCSWDMP or any of the outline management plans to ensure that there would be no permanent effects in terms of say disturbance or re-routing of underground springs or other	The Hydrogeological Risk Assessment and any associated monitoring will not in themselves eliminate the risk to the Tan-y-Mynydd Trout Fishery's water supply, however they will provide the necessary evidence to demonstrate that the risk of any permanent effects are low and the effects of those activities are, small. The Applicant notes that the recharge of groundwater levels is over a large area; construction activities of the Mona

Ref. No.	Question to	Written Question	Applicant's response
		water sources supplying the brook that feeds the Fishery?	Offshore Wind Project will extend to a relatively localised area and are unlikely to sever key fractures or close the connectivity of the fractures. It should be noted that the principal concern for the Tan-y-Mynydd Trout Fishery relates to the effects on the spring itself that feeds the 'top pond'. The Brook itself is largely a rainfall dependent stream that is flashy in nature being principally dependent on surface runoff form the upgradient catchment. The Applicant understands that the Brook is only used on occasions to top up the two southern ponds on the fishery by way of two small diversion pipes that are opened and closed manually. Construction activities are unlikely to have permanent effects on the flow characteristics of the Brook. However, at times of higher rainfall, there is the potential that the water quality of the Brook could be affected by runoff from the construction areas. The Applicant notes that runoff would not enter the fishery unless piped flow diversions are opened. Furthermore, the potential impact will be mitigated by measures in the Construction Surface Water and Drainage Management Plan (REP2-050) to control the quality and discharge of surface runoff. The Construction Surface Water and Drainage Management Plan forms part of the CoCP, which is secured as a requirement of the DCO.
Q2.8.8	The Applicant	**Watercourse crossing** What provision has been made for crossing the existing storm water channel that adjoins the access road to the existing sub-station?	The Applicant is aware of the storm water channel and considered the crossing of it as part of the construction feasibility associated with the site selection process (see Section 1.4.4 of Volume 5, Annex 4.2: Site Selection Black-Red-Amber-Green (BRAG) (APP-082) that outlines the considerations for the onshore substation access). There are currently two options included within the Order Limits for the permanent access road to the onshore substation. One option utilises an existing culvert crossing installed for the Burbo Bank Offshore Wind Extension Project. The other option would require a new crossing of the storm water channel. If a new crossing is required the final design would ensure the function of the storm water channel is maintained, most likely through the use of a concrete slab which would span the storm water channel, ensuring the capacity of the channel is not reduced. The detailed design for the permanent access road will be included in the final Onshore Construction Method Statement, to be approved by the relevant authority, as part of the Code of Construction Practice for the relevant stage of Works.
Q2.8.9	The Applicant	**Water Framework Directive** New guidance concerning the requirements of the WFD in relation to NSIP applications was published on 20 September 2024 by the Planning Inspectorate on its Nationally Significant Infrastructure Projects: Advice pages website.	The Applicant notes that the new guidance relating to Water Framework Directive (WFD) was published after the application for the Mona Offshore Wind Project was submitted. Nevertheless, the Applicant can confirm that its Water Framework Directive surface and groundwater assessment (as presented in APP-120) follows the recommended approach of the 2024 guidance (i.e. screening, scoping and detailed assessment).

Ref. No.	Question to	Written Question	Applicant's response
		Can you set out how you have considered this guidance?	
Q2.8.10	*NRW*	***Water Framework Directive*** *Does the Applicant's Geomorphology Clarification Note [REP4-040] address your comments in point 3.2.7 Fluvial geomorphology elements of the WFD of your RR (RR-011) and in your SoCG with the Applicant [REP1-026]? If not, what further information or evidence do you need from the Applicant to allay your concern?*	A meeting was held with NRW (A) on 9 October 2024 to discuss the contents of the Geomorphology Clarification Note (REP4-040). It is the Applicant'[s understanding that the clarification note has resolved NRW (A)'s outstanding concerns and has updated the Statement of Common Ground accordingly. The Applicant has shared the updated SoCG with NRW (A) and awaits written confirmation of this position from NRW (A).
Q2.8.11	*CCBC* *DCC*	***Water Framework Directive*** *Does the Applicant's Geomorphology Clarification Note [REP4-040] address your comment regarding geomorphology characterisation in your LIR [REP1-048] and SoCG with the Applicant [REP3-061]? If not, what further information or evidence do you need from the Applicant to allay your concern?*	The Applicant notes that this matter has been agreed with CCBC (REP3-061 F02, section 1.4.4) and DCC (REP3-060, section 1.4.4) in their Statements of Common Ground.
Q2.8.15	*CCBC* *DCC*	*Flood Risk & Water Resources* *In your LIR [REP1-049] you concluded that the Proposed Development's potential effects on flood risk and water resources had not been properly assessed. Subsequent to the Applicant's response to your LIR [REP2-085] and exchanges between it and NRW ([REP2-080], [REP3-090], [REP4-105]) have those concerns been allayed?*	The Applicant notes that this matter has been agreed with CCBC (REP3-061 F02, section 1.4.4) and DCC (REP3-060, section 1.4.4) in their Statements of Common Ground.

2.10 Historic Environment

Table 2.10: Response to ExQ2: Historic Environment

Ref. No.	Question to:	Written Question	Applicant's response
Q2.11.1	The Applicant	**Historic Environment Act (Wales) 2023** The Historic Environment Act (Wales) 2023 is due to come into force on 4th November 2024. Can the Applicant review the act and explain if there are any implications for the assessment undertaken in [APP-068] as well as its supporting chapters in the ES?	The Historic Environment (Wales) Act 2023 does not introduce any changes to the current management and protection of the historic environment in Wales; it is primarily aimed at consolidating existing legislation (principally the Historic Buildings and Ancient Monuments Act 1953, the Ancient Monuments and Archaeological Areas Act 1979, the Planning (Listed Buildings and Conservation Areas) Act 1990 and the Historic Environment (Wales) Act 2016) into a single and fully bilingual act. A suite of secondary legislation has also been updated in support of the new act, but again these updates do not introduce any changes to the current management and protection of the historic environment in Wales. Consequently, there are no implications for the assessment presented in Volume 3, Chapter 5: Historic environment (APP-068) and the supporting chapters in the Environmental Statement. In its Written Representation (REP-051), Cadw confirms that the Historic Environment (Wales) Act will not alter legislation and no new guidance will be issued by Cadw.
Q2.11.2	The Applicant	**Historic Environment Policy** Overarching National Policy Statement for Energy EN-1, paragraph 5.9.24, states that "*The Secretary of State should also consider the desirability of the new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials, use and landscaping (for example, screen planting)*". Has the Applicant considered the character and local distinctiveness of the historic environment in its design choices for the Onshore Substation?	The character of the historic landscape has been considered within the design of the Mona Onshore Substation site, specifically the mitigation planting. As set out in paragraphs 3.9.1.9 to 3.9.1.10 of the Design Principles (J3 F03), the mitigation planting includes the reinstatement of former field boundaries that are recorded on 19th century maps but which have subsequently been removed and are currently totally absent or represented only by isolated trees. The reinstatement of these former field boundaries (as implemented in accordance with the Outline Landscape and Ecology Management Plan (J22 F03) would be a positive contribution to the character and local distinctiveness of the historic environment. Consideration has also been given to the setting of the Grade II Listed barn (Pentre Meredydd). An area of wildflower meadow has been proposed to the north of the barn (see Outline Landscape and Ecological Management Plan (LEMP) (J22 F03)) as an alternative to woodland planting in order to retain the open views from the Listed Building. In its Written Representation (REP1-051), Cadw noted that the proposed mitigation measures are likely to reduce the effect on the setting of the Listing Building from moderate adverse to minor adverse, which is not significant.

2.11 Land Use

Table 2.11: Response to ExQ2: Land Use

Ref. No.	Question to:	Written Question	Applicant's response
Q2.12.1	The Applicant	**Potential impact on farm businesses** In Section 7.8.3 of ES Chapter 7 (Vol 3) Land Use and Recreation [APP-070] you set out your conclusions on the magnitude of impact of the Proposed Development on farm holdings. With specific regard to the 3 intensive dairy farm enterprises that you identified in your Response to Examining Authority's Written Questions (ExQ1) [REP3-062]: • Were those conclusions underpinned by an economic assessment of the Proposed Development's likely impact on the individual farm businesses' operations and viability during the construction phase and, as appropriate, the operational phase? • If not, what evidential basis did you rely on to inform your assessment of those matters and arrive at your conclusions?	Go to legal/paul sign off The assessment of impacts on farm businesses (as set out in Volume 3, Chapter 7: Land Use and Recreation (APP-070) (including the three intensive dairy enterprises identified in REP3-062) did not include a detailed economic assessment of viability. The assessment is based on information that was publicly available and information that was disclosed by the landowners or occupiers to the agents acting on behalf of the Applicant through their land referencing work and discussions with individual landowners and interested parties. This included: 1. Data on the extent of individual land holdings as far as it was disclosed. 2. Information on the nature of farming arrangements including land ownership, farming tenancies, licences or informal agreements. 3. Information on the nature and operation of the individual farming businesses affected. During the meetings with the landowners and occupiers, provision of potential mitigation measures for the individual holdings that would assist with the continuing operation of the holdings and mitigate the impact during the construction and reinstatement phases of the development were discussed including the use of crossing points, movement of water troughs and fencing of severed land. These will be secured through the Outline Code of Construction Practice (J26 F04) and through the voluntary agreements where they are in place.
Q2.12.6	The Applicant	**'The Old Lane', Groesffordd Marli** Will you be amending your Outline Public Rights of Way Management Strategy [REP2-070] in respect of Plot 10-187 as shown on the Land Plan (Onshore) [REP1-004]?	The Outline Public Rights of Way (PRoW) Management Strategy (REP2-070) will be updated during the detailed design process in consultation with and approved by DCC. The Old Lane will be added to the detailed PRoW Management Strategy subject to the bridleway being added to the definitive PRoW map by DCC. The Applicant will consult DCC regarding the timeframes for when The Old Lane will be added to the definitive map and will agree appropriate management measures for the route (if required).

2.12 Landscape and Visual and Good Design

Table 2.12: Response to ExQ2: Landscape and Visual and Good Design

Ref. No.	Question to:	Written Question	Applicant's response
Q2.13.1	The Applicant	**Good Design Guidance** New guidance concerning Good Design and its application to Nationally Significant Infrastructure projects was published on 23 October 2024 by the Planning Inspectorate on its Nationally Significant Infrastructure Projects Advice website. Can the Applicant set out how it has considered this guidance, including the issues covered in Annexe A of the design advice, and how it has taken account of the four National Infrastructure Commission (NIC) design principles?	The Applicant has reviewed the new guidance published on 23 October 2024. The Design Principles (J3 F03) have been updated to take account of the guidance, including providing detail on how the four NIC design principles have been addressed. Annex 2 – Q2.13.1 - Response to Annex A Of The Nationally Significant Infrastructure Project: Advice On Good Design, of this document demonstrates how the Applicant has addressed the points set out in Annex A of the Nationally Significant Infrastructure Projects: Advice on Good Design.

2.13 Marine and Coastal Physical Processes and Coastal Change

Table 2.13: Response to ExQ2: Marine and Coastal Physical Processes and Coastal Change

Ref. No.	Question to:	Written Question	Applicant's response
Q2.14.1	The Applicant	**Cable protection** In its D3 submission [REP3-090], NRW (A) states that in the event that any area of cable protection exceeding 5% of navigable depth is identified, a further physical processes assessment in the shallow nearshore environment just seawards of MLWS over the exit pits should be conducted (para 102). Do you agree if this is appropriate and if so, how would this be secured?	The Applicant confirms agreement with NRW (A) that should there be a need to reduce the water depth by more than 5% (referenced to Chart Datum) in the shallow nearshore environment; further physical processes assessment may be required. As stated in the Applicant's Response to NRW Deadline 3 Submission (REP4-047, rows REP3-090.103 to REP3-090.105) submitted at Deadline 4, the Applicant refers the Examining Authority to the Marine Licence Principles Document (J9 F05). In particular, the row relating to the Cable Specification Installation Plan (CSIP) and how the Applicant expects that a condition will be included within the standalone NRW marine licence securing the commitment to ensure water depth reduction resulting from cable protection activity does not exceed 5% in surrounding depth referenced to Chart Datum at any location without prior written approval from NRW. In the unlikely event that a reduction in water depth of more than 5% is necessary for the shallow nearshore environment the Applicant anticipates NRW (A) will be a consultee in respect of agreeing any requirement for further physical processes assessment and the scope of this. The Applicant welcomes NRW (A) putting forward this approach should the need arise to reduce the water depth by more than 5% in the shallow nearshore environment in NRW (A)'s Deadline 3 Submission (REP3-090, para 102) and will continue to engage with NRW (A) on the offshore Construction Method Statement (oCMS) and the CSIP in this regard.
Q2.14.2	The Applicant	**Cable burial** In its D3 submission [REP3-030] NRW (A) advise that the Applicant should review historical beach profiles in order to determine the depth of cable burial to avoid exposure following a major storm event. Could this be secured via the Landfall Construction Method Statement?	The Applicant can confirm that the intent to review historical beach profiles has been included in the updated Landfall Construction Method Statement (REP4-017 para 1.10.3.2) submitted at Deadline 4. As outlined in the Applicant's Response to NRW Deadline 3 Submission (REP4-047, rows REP3-090.105 to REP3-090.108) submitted at Deadline 4, details of the final design will be included within the final Landfall Construction Method Statement submitted to the relevant planning authority for approval in consultation with NRW as secured in Schedule 2, Requirement 9(2) of the draft DCO (C1 F06).

Q2.14.3	The Applicant	**Sandwave recovery monitoring** Noting your response to ExQ1 (Q1.14.4) [REP3-062] that the geomorphological surveys already committed to will now be considered in the context of sandwave recovery modelling for information purposes, can you ensure that this is included in the updated Offshore In-Principle Monitoring Plan to be submitted at D5 so that it is explicit this will be completed and which DML condition secures the monitoring.	The Applicant can confirm that monitoring of sandwave clearance recovery has been included in the OIPMP (J15 F02) submitted at Deadline 5.

2.14 Navigation and Shipping

Table 2.14: Response to ExQ2: Navigation and Shipping

Ref. No.	Question to:	Written Question	Applicant's response
Q2.15.1	The Applicant Isle of Man Steam Packet Company	**Statement of Common Ground** Produce a Statement of Common Ground on all issues of relevance to the Isle of Man Steam Packet Company. For submission at Deadline 5, with final version at Deadline 7. Add the Isle of Man Steam Packet Company to the Statement of Commonality.	The Applicant confirms it has engaged with the Isle of Man Steam Packet Company to prepare a Statement of Common Ground for submission at Deadline 5 (S_D5_30) and this has been included in the updated Statement of Commonality (S_D1_7 F03).
Q2.15.2	*Stena Line (UK) Limited*	***Residual effects on Stena Line operations*** • *Describe the commercial and / or operational implications of increased transit times for Stena Line services as a result of the Mona project cumulatively with other plans and projects in the Irish Sea.* • *Do you consider that the deviations necessary to accommodate the Mona project together with other planned offshore wind farms could threaten the viability of Stena Line's ferry operations? If so, how?* • *Is there any further mitigation that you consider should be adopted by the Applicant to further reduce the residual cumulative effects of the Proposed Development on the operations of Stena Line in typical and adverse weather conditions?*	The Applicant's assessment concludes that there would be minor adverse impacts on the Stena Line route between Liverpool and Belfast to the west of the Isle of Man as a result of the Mona Offshore Wind Project in Volume 2, Chapter 7: Shipping and navigation (APP-059). As noted in the Applicant's response to ExQ1.15.12 (REP3-062), given the spatial distribution of typical and adverse weather tracks across the eastern Irish Sea, the Applicant cannot avoid impacts on strategic routes or lifeline ferries and has instead sought to minimise deviations as far as possible. When considered cumulatively with other Tier 1 and Tier 2 projects, moderate adverse impacts on Stena Line routes to the east of the Isle of Man and between Heysham and Belfast were identified, but these are not caused by the Mona Offshore Wind Project. The Applicant is engaging with Stena Line on a commercial side agreement to address residual impacts in parallel with the Examination with the intention of completing this process by Deadline 7, details of which will be provided in future updates to the Commercial Side Agreements Tracker (REP1-036). The Applicant has prepared a Statement of Common Ground with Stena Line for submission at Deadline 5 (S_D5_29) which will be updated with final positions at Deadline 7.
Q2.15.3	*UK Chamber of Shipping*	***Additional towing capability*** *Line CoS.SAN.21b of [REP3-028] refers to the potential need for additional towing capability or resource due to the additional risk from cumulative projects in the Irish Sea. If this matter remains unresolved at Deadline 5, provide elaboration on the point explaining what*	The Applicant's assessment concludes that the cumulative risks of the Mona Offshore Wind Project (excluding Mooir Vannin Offshore Wind Farm) are Tolerable and As Low As Reasonably Practicable (ALARP) and the Applicant notes that agreement on the ALARP finding is noted in the Statement of Common Ground with the Maritime and Coastguard Agency (MCA) (REP3-026) and no consensus was reached on their requirement at the hazard workshop. The Applicant therefore contends that the introduction of Emergency

Ref. No.	Question to:	Written Question	Applicant's response
		commitment is sought from the Applicant and why.	Towage Vessel (ETV) in the Irish Sea would be disproportionate in Volume 6, Annex 7.1: Navigational Risk Assessment (NRA) (APP-098) and notes the following key points in how it reached this conclusion: • As concluded in the Volume 6, Annex 7.1: NRA (APP-098), there are no unacceptable risks to navigation • Volume 6, Annex 7.1: NRA (APP-098) noted the likelihood of a vessel becoming disabled adjacent to an offshore wind farm is low • An ETV has a very high cost of procuring and operating. The UK used to operate a fleet of four ETVs between 1993 and 2010, but this was disbanded in 2010 to save £32.5 million • Several studies have considered cost benefit of ETVs more widely. For example, a study by Frazer-NASH in 2020 concluded there was no cost benefit justification for dedicated ETVs in the UK • The effectiveness of ETVs has been questioned, for example a study by the Dutch Board of Safey in 2024 noted: – ETVs need to be located very close to the casualty or the response time significantly limits their effectiveness – It can be very difficult to secure a tow, particularly in adverse weather, where tow lines can break, or crew may even be injured. • Existing commercial towage in regions such as the Irish Sea could offer some assistance if required • Multiple ferry routes in the Irish Sea currently pass directly upwind of existing offshore wind farms, such as the Walney and West of Duddon Sands arrays, but their requirement has not been previously suggested by stakeholders. Furthermore, there is no precedent elsewhere in the UK for dedicated ETVs adjacent to regions of high density offshore wind farms (e.g. Thames Estuary or Round 3 development zones) • The likely immediate response of a disabled vessel would be to deploy its anchor, given the relatively shallow depths of the Irish Sea which would offer some mitigation in the unlikely event of a mechanical failure.

2.15 Noise and Vibration

Table 2.15: Response to ExQ2: Noise and Vibration

Ref. No.	Question to:	Written Question	Applicant's response
Q2.16.1	*Mr & Mrs Hussey*	***Mr & Mrs Hussey*** *In the Examining Authority's Written Questions 1 (ExQ1) ([PD-013], Q1.16.3) Denbighshire County Council and Conwy County Borough Council were asked to comment on concerns you raised about noise assessment and monitoring [REP1-086] and the Applicant's response [REP2-078]. The Councils engaged with the issues in their Response to First Written Questions ([REP3-078], page 50).* • *Do you agree with their position?* • *If not, please either explain why or cross-reference to where you consider you have dealt with the issues in previous submissions to the Examination.*	The Applicant notes that Q2.16.1 to Q2.16.3 are addressed to other parties but wanted to provide a response to update the ExA on the latest engagement with Mr & Mrs Hussey. The Applicant met with Mr & Mrs Hussey on Monday 18t November to discuss and explain the Construction Noise and Vibration Clarification Note (REP4-045). The Applicant believes that the meeting was beneficial to Mr & Mrs Hussey and answered a number of their questions on noise and vibration, construction methodology, mitigation and commitments made with the management plans submitted with the Application and through Examination. The Applicant has committed to ongoing dialogue directly with Mr & Mrs Hussey through the remainder of the Examination, and will seek to update the ExA on those communications where necessary.
Q2.16.2	*Mr & Mrs Hussey Any APs or IPs*	***Construction Noise and Vibration Clarification Note*** *Either in response to this question at Deadline 5 or at Deadline 6 when the Applicant has submitted its updated versions of the Noise and Vibration Chapter of the ES [APP-072] and the Construction noise and vibration technical report [APP-179] at Deadline 5, with reasoning for your position, please advise whether you agree with the Applicant's assumptions/ methodology, analysis and conclusions in its Construction noise and vibration clarification note [REP4-045] in respect of how those factors might affect you?*	
Q2.16.3	*DCC* *CCBC*	***Noise assessment and monitoring*** *Further to your Response to First Written Questions ([REP3-078], Q1.16.3), amongst other*	

Ref. No.	Question to:	Written Question	Applicant's response
		things, IPs rebutted the Applicant's response [REP2-078] to their initial concerns about noise assessment and monitoring [REP1-086]. Taking account of the IPs' submission [REP3-110] and the Applicant's response [REP4-056], with reasoning for your conclusions, do you share any of the former's on-going concerns?	
Q2.16.5	The Applicant	**Construction Noise and Vibration Clarification Note** Can you address the following queries arising from your Construction Noise and Vibration Clarification Note [REP4-045]: 1. In respect of Trenchless Techniques, there is apparent ambiguity in Table 1 - 1 thereof. The middle column says that the assessment assumed night time working at all trenchless locations, which would correspond with Requirement 14(2)(a) of the dDCO [REP4-005]. However, the third column refers to night-time works assumed at Landfall and Gwyrch Wood with works in other locations in accordance with Requirement 14. Please clarify the difference in the Construction noise model assumptions used in the ES assessment and the subsequent review. 2. As referred to in Table 1 - 2 thereof, how would inclusion the proposed topsoil bunds proposed along the boundary of the Onshore Cable Corridor Order Limits during the construction works be secured by the dDCO [REP4-005]? 3. What do you mean in paragraph 1.2.4.6 by 'any extended period' and 'short-term in duration'? Please define/ quantify those terms and advise how they would be enforced.	1. The Applicant confirms that the construction noise and vibration assessment included as part of the application assumed potential night-time working at all trenchless technique locations. In the subsequent review submitted in the Construction Noise and Vibration Clarification Note (REP4-045) the Applicant revisited this assumption and concluded that night-time working would only be required for the complex trenchless techniques locations at Landfall and at Gwyrch Wood. For all other locations, the Applicant considered the trenchless techniques works to be non-complex and hence such works will be undertaken in accordance with the working hours in Requirement 14(1) of the draft DCO. If trenchless techniques works outside of these working hours are required in non-complex locations, the relevant planning authority will be notified at least 48 hours in advance, in accordance with Requirement 14(3) or 14(5) of the draft DCO. 2. The Applicant refers to paragraph 1.6.3.2 of the Outline Construction Noise and Vibration Management Plan (J26.3 F04), which states that earth bunds will be established along the boundary of the Mona Onshore Cable Corridor Order Limits to minimise noise impacts from works required for joint bay construction. The Plan also states that earth bunds, or barriers of equivalent height, will be established at locations along the Mona Onshore Cable Corridor where construction noise associated with trenchless technique crossings works has the potential to result in adverse impacts at nearby properties. The final cross section and location of the bunds, and location and height of barriers, will be agreed with the relevant local authority in the final Onshore Construction Method Statement and transposed appropriately into the final Construction Noise and Vibration Management Plan, the latter which will be secured through the Requirement 9(2)(c) of the draft DCO. 3. The Applicant confirms that the terms 'any extended period' and 'short term in duration' in paragraph 1.2.4.6 have been used interchangeably to describe durations which will not exceed those set out in paragraph 9.6.2.10 of Volume 3, Chapter 9: Noise and Vibration (APP-072). These durations, which are replicated below, are used in the construction assessment to determine the likelihood of significant adverse

Ref. No.	Question to:	Written Question	Applicant's response
			effects occurring at receptors which are predicted to experience high and medium impacts: *1) 10 or more days in any 15 consecutive days or nights;* *2) a total number of days exceeding 40 in any 6 consecutive months'* High and medium impacts are predicted to occur at individual receptors due to dynamic compaction works associated with the establishment of the haul road and temporary construction compounds, as set out in Table 1-3 of the Construction Noise and Vibration Clarification Note (REP4-045). Construction method statements for such activities, including their duration, will be included in the final Onshore Construction Method Statement, the latter which will be agreed with the relevant local authority who will also be responsible for compliance and any enforcement.
Q2.16.6	The Applicant	**Construction working hours** If the Proposed Development was required to adhere to those working hours secured in R15 of the AyM DCO (0700-1900 Monday to Friday and 0700-1300 Saturday), do you consider that this would have a significant effect on the construction programme or the financial viability of the Proposed Development? If so, please provide an explanation of why you consider this to be the case.	The Applicant can confirm that if the construction working hours were to be reduced, in line with the Awel y Mor DCO, the Project will be significantly affected in an adverse manner, from a programme perspective, which in turn would have a significant financial impact. From a productivity perspective, works that would otherwise have been programmed based on full day working on Saturday would be deferred to the next working week, as the costs associated with contractors/suppliers (labour, materials, machinery and plant) and associated supply chain costs are not viable if productivity is restricted to 50% of the working day. The effective loss of Saturdays from the construction programme would result in a combined reduction of approximately 1,716 working hours (equivalent to a total of approx. 6.5 months) over the 33-month construction period for the onshore substation and 33-month construction period for the onshore cable corridor. It is critical that the construction programme be maintained to ensure the project's ability to meet the National Grid connection date (Q3 2029) and fulfil its role in contributing the UK Government's renewable energy target of 50 GW of offshore wind by 2030. In addition, there is a direct correlation between delays in the project programme and construction costs which would contradict the requirement in NPS EN-5, to design and deliver the most economic and efficient project possible so that those efficiencies can be communicated to consumers.
Q2.16.7	The Applicant	**Mobilisation period** The proposed mobilisation period of up to one hour before and after core working hours is permitted and defined by the Outline CoCP	The Applicant has reviewed the drafting of Requirement 14 in light of the comments raised and has made changes to the drafting within the Deadline 5 Draft Development Consent Order (Document Reference C1 F06). The changes which have been made are not, therefore, made on a without prejudice basis.

Ref. No.	Question to:	Written Question	Applicant's response
		[REP2-038]. Whilst it is noted that Requirement 9 of the dDCO [REP4-005] would secure compliance with the approved CoCP, without prejudice, can you provide wording for amendment of the dDCO that would: • Define the term '*mobilisation period*' within the dDCO and control it by virtue of Requirement 14; • Accurately reflect the relevant planning authority's role in respect of Requirement 14(3). It currently includes the words 'must be agreed by' whereas it appears that the Applicant is only required to notify it at least 48 hours in advance of works subject of Requirement 14(3); • In respect of Requirement 14(4), specify a time period within which the undertaker must give the relevant planning authority advance notification of the subject works; and • Provide a commitment to the Communication Liaison Officer giving advance notice to nearby residents of works subject of Requirement 14(3) and (4). The draft wording should specify the period of advance notice and who must be notified.	The changes to the Deadline 5 Draft Development Consent Order (Document Reference C1 F06) are as follows: • The Applicant has updated 14(2) to include a new bullet (f) in the list of activities which may be undertaken outside of the hours specified in paragraph 1. Bullet (f) reads *'Mobilisation activities, which may take place one hour immediately prior to and one hour immediately after the hours specified in sub-paragraph (1).'* In addition, a definition of 'mobilisation activities' has been included as a new sub-paragraph 14(7) which confirms that for the purposes of this requirement 14, mobilisation activities '*include personnel briefings, inspections, tool-box talks, inductions, health and safety works, deliveries, movement to place of work, unloading, general preparation and site maintenance work but does not include operation of heavy machinery or operation of generators or flood lights.'* The Applicant considers that these two drafting changes together set out clearly on the face of the draft DCO what the mobilisation period is and provide clarity as to what activities can be undertaken during that period. • The Applicant has updated the drafting at 14(3) to make it clearer. Save for trenchless installation works (which are controlled by 14(4)) and emergency works, the drafting at 14(3) confirms that the Undertaker must give at least 48 hours advance notice of all other works which need to be undertaken outside the core working hours and the undertaker cannot do those works outside the core working hours until the relevant local planning authority has agreed. • Requirement 14(4) now specifies that at least 48 hours' notice must be provided. With regards to the request to 'Provide a commitment to the Communication Liaison Officer giving advance notice to nearby residents of works subject of Requirement 14(3) and (4). The draft wording should specify the period of advance notice and who must be notified', the Applicant does not consider that this is a commitment that is necessary or appropriate to include in the draft DCO. Requirement 14 (especially with the drafting updates now included) clearly sets out the scope of the core working hours and the works and activities that may be undertaken outside of those hours with appropriate controls sitting with the relevant planning authority. The role of the Community Liaison Officer is set out in the outline Communications Plan that is secured through the Code of Construction practice. The Applicant considers the Communications Plan is the appropriate mechanism to provide for notice to local residents of advance notice of 48 hour working, with para 1.6.1.1 of REP2-046 setting out notification for works outside core working hours.

2.16 Offshore Biodiversity, Ecology and Natural Environment - General

Table 2.16: Response to ExQ2: Offshore Biodiversity, Ecology and Natural Environment - General

Ref. No.	Question to:	Written Question	Applicant's response
Q2.17.1	The Applicant	**General** NPS EN-3 paragraph (2.8.90) notes as part of the Offshore Wind Environmental Improvement Package set out in the British Energy Security Strategy, the government committed to establishing Offshore Wind Environmental Standards. Can you summarise how measures incorporated into the Proposed Development (to avoid, reduce and mitigate) could inform offshore wind environmental standards.	The UK Government's Offshore Wind Environmental Standards (OEWS) (formally called nature-based design standards in the British Energy Security Strategy (HM Government, 2022)) aim to reduce the overall environmental impact of a development, through providing clear guidance to developers on best practice to incorporate into the design, construction, operation and decommissioning of offshore wind farms. The purpose is to enable some environmental impacts to be scoped out at an earlier stage of the consenting process (Department for Business, Energy and Industry Strategy, 2023). The Applicant understands from a recent update by the Department for Environment, Food and Rural Affairs (Defra) via the Pathways to Growth Coordination Group that OWES will only apply to The Crown Estate's Offshore Wind Leasing Round 5 and will not be retrospectively applied to Round 4 projects. Nonetheless, measures incorporated into the Mona Offshore Wind Project that could inform future OWES include the provision of Design Principles (REP2-026) and the avoidance, reduction and mitigation of impacts to designated sites / Important Ecological Features (IEFs) where possible through its commitments to primary, tertiary and secondary mitigation, as outlined in the Mitigation and Monitoring Schedule (J10 F05). The identification of and commitment to measures to avoid, reduce and mitigate potential impacts on the offshore environment has been part of an ongoing iterative design process which takes into account potential likely significant effects and considers primary, tertiary and secondary mitigation in accordance with IEMA guidance (IEMA, 2024). The EIA process and ongoing consultation with both statutory and non-statutory stakeholders through the Evidence Plan Process have informed the design of the Mona Offshore Wind Project. Details of the Applicant's approach are set out below, which draws upon specific examples relating to the offshore biodiversity, ecology and natural environment: **Avoid:** As described in Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-016), a key consideration for the Applicant within the design of the Mona Offshore Cable Corridor and Access Areas was avoiding interactions with key ecological designations where possible. At the scoping stage, the offshore Area of Search (AoS) sought to specifically avoid interactions with Aber Dyfrdwy/Dee Estuary Special Area of Conservation (SAC), Special Protection Areas (SPA) and Ramsar site, Traeth Lafan/Lavan Sands, Conwy Bay SPA, Morwenoliaid Ynys Môn/Anglesey Terns SPA and the Gogledd Môn Forol/North Anglesey Marine SAC.

Ref. No.	Question to:	Written Question	Applicant's response
			With regards to reducing impacts by means of minimising overlap between the Mona Offshore Wind Project and designations/IEFs, after taking into account feedback received from NRW (A), the Mona Offshore Cable Corridor and Access Areas avoids all qualifying features of the Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC. This includes sandbanks slightly covered by water at all time, mudflats and sandflats not covered by seawater at low tide, large shallow inlets and bays, reefs and submerged or partially submerged sea caves. The Applicant has also made a commitment to the installation of Mona export cables via trenchless techniques under the intertidal area, thereby eliminating the need for open cut trenching at the landfall which could have intersected with, and therefore potentially impacted, the intertidal clay and piddocks IEF. **Reduce:** For those ecological designations that could not be avoided through the site selection process, the Applicant sought to minimise interaction by adopting primary and tertiary mitigation measures to reduce potential effects (such measures are also referred to as 'embedded mitigation'. IEMA, 2024 defines primary mitigation as measures included as part of the project design, secondary mitigation as further measures required in order to reduce the residual impact to an acceptable level and tertiary mitigation as measures required to meet legislative requirements or which are considered good industry practice). For example, the Applicant has committed to a number of primary mitigation measures relating to the installation and protection of export cables through the Constable Bank feature and the Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC, including limitations to cable projection and seabed preparation activities, as set out in paragraph 4.11.4.1 of Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-016). **Mitigate:** Where avoidance or reduction of impacts to designations / IEFs has not been possible, the Applicant has sought to mitigate residual impacts as far as possible through secondary mitigation commitments. These include, for example, to development and adherence to an UWSMS that includes consideration of Noise Abatement Systems (NAS).
Q2.17.2	The Applicant	**General** Further to your response to October Hearing Action Points ref HAP_ISH4_10 [REP4-036] (in relation to paragraph 2.8.221 of the NPS EN-3) can you: i. for the MMO (2014) Review of environmental data associated with post-consent monitoring of licence conditions of offshore wind farms submit a copy to the examina	The Applicant has responded in Annex 4 – Response to Q2.17.2.

Ref. No.	Question to:	Written Question	Applicant's response
		ii. tion of the review, as well as a summary naming the offshore windfarm projects, their location and array area size, and year of operation. iii. for the Marine Data Exchange held by the Crown Estate can you list the Offshore Windfarm projects within proximity of the proposed Mona OWF and summarise the offshore wind monitoring topics that inform impact assessments.	
Q2.17.3	The Applicant	**General** Where you mention in your response to October Hearing Action Points ref HAP_ISH4_10 [REP4-036] that there is no precedent to monitor all receptors and potential effects the ExA notes that the approach to offshore wind ecological monitoring is different in the current 2024 NPS EN-3 to that compared to its predecessor the 2011 NPS EN-3. The previous 2011 NPS EN-3 stated that '*Ecological monitoring is likely to be appropriate during the construction and operational phases to identify the actual impact so that, where appropriate, adverse effects can then be mitigated and to enable further useful information to be published relevant to future projects* ' [paragraph 2.6.71]. The wording was also different in the draft March 2023 NPS EN-3 [paragraph 3.8.236]. Can you explain how you would satisfy the current 2024 NPS EN-3 and the statements *'must develop an ecological monitoring programme to monitor impacts during the pre-construction, construction and operational phases to identify the actual impacts caused by the project and compare them to what was predicted in the EIA/HRA'* [paragraph 2.8.221] and *'should impacts be greater than those predicted, an*	The Applicant wishes to highlight its submission of a NPS Tracker (APP-187) as part of its DCO application. This document demonstrates the Mona Offshore Wind Project's accordance with the three relevant NPSs, including the NPS for Renewable Energy (EN-3). It outlines the regard given to the NPS EN-3 in developing the Mona Offshore Wind Project), with further information provided in the Planning Statement (APP-186) and Environmental Statement. To align with paragraph 2.8.221 of NPS EN-3, the Applicant has developed an ecological monitoring programme which is presented in the OIPMP (J15 F02). The OIPMP (J15 F02) presents the objectives of any monitoring measures contained within the deemed marine licence (dML) in Schedule 14 of the draft DCO (C1 F06) or suggested within the Marine Licence Principles document (J9 F05) for inclusion in the standalone NRW marine licence. Ecological monitoring has also been included in the OIPMP (J15 F02) where the EIA identified potential significant adverse effects (in line with the requirements of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017), where it is industry best practice or where it has been specifically requested by the Statutory Nature Conservation Bodies (SNCBs) in order to validate particular assumptions made within the assessments (specifically sandwave recovery monitoring). To date, the SNCBs have not raised any other specific concerns with respect to the adequacy of the ecological monitoring proposed within the OIPMP (J15 F02). The OIPMP also includes a monitoring programme for scallop made on a voluntary and precautionary basis to address concerns expressed by commercial fisheries stakeholders. The Applicant does not consider that the NPS policy requires the monitoring of all impacts from an offshore wind farm as this would be disproportionate in terms of time and cost and, without clear rationale and objectives, would not provide useful information relevant for future projects With regards to paragraph 2.8.222 of NPS EN-3, if during monitoring any impacts are found to be greater than those predicted, the nature of further actions (such as the

Ref. No.	Question to:	Written Question	Applicant's response
		adaptive management process may need to be implemented and additional mitigation required, to ensure that so far as possible the effects are brought back within the range of those predicted' [paragraph 2.8.222]	potential implementation of an adaptive management process) would be discussed with the licensing authority in consultation with the relevant stakeholder.

2.17 Offshore Biodiversity, Ecology and Natural Environment – Benthic

Table 2.17: Response to ExQ2: Offshore Biodiversity, Ecology and Natural Environment - Benthic

Ref. No.	Question to:	Written Question	Applicant's response
Q2.17.4	The Applicant	**Inter-related Effects - Offshore** Can you advise why introduction of artificial structures impact includes *and colonisation of hard structures* wording in Table 11.8 in Chapter 11 (Vol 2) Inter-related Effects – Offshore [APP-063]. This additional wording isn't included in the impact identified in Benthic subtidal and intertidal ecology [APP-054]. Can you also check *alteration of seabed habitats arising from effects of physical processes* impact with the impact wording in Benthic subtidal and intertidal ecology [APP-054].	The Applicant can confirm that the impact heading wording 'Colonisation of hard substrate' in Table 11.7 of Volume 2, Chapter 11: Inter-related Effects – Offshore (APP-063) is incorrect and should read 'colonisation of hard structures' as per the wording of the impact pathway assessed in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054). The Applicant will add this errata to the Errata Sheet which will be appended to Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) at Deadline 7 but can confirm that despite this inconsistency, the same impact has been assessed in both Volume 2, Chapter 11: Inter-related Effects – Offshore (APP-063) and Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054). With regards to the impact pathway titled 'alteration of seabed habitats arising from effects of physical processes' included in Table 11.7 of Volume 2, Chapter 11: Inter-related Effects – Offshore (APP-063), the Applicant can confirm that this is an incorrect duplication of the impact pathway 'changes in physical processes' which is also assessed and should, therefore, be disregarded. The Applicant will add this errata to the Errata Sheet which will be appended to Volume Chapter 11: Inter-related Effects – Offshore (APP-063) at Deadline 7.
Q2.17.5	The Applicant NRW (A) JNCC	**Water depth** The Mitigation and Monitoring Schedule [REP4-013] reference no 8 notes that if the water depth is reduced by more than 5% written approval from the Licensing Authority in consultation with the Maritime and Coastguard Agency (MCA) would be sought. Can you summarise what approach would be taken regarding benthic subtidal and intertidal ecology assessment of effects including any necessary approval from SNCBs if water depth is reduced by more than 5%?	As detailed in the Applicant's response to NRW Deadline 3 Submission (REP4-047, rows REP3-090.103 to REP3-090.105) and also as outlined in the Marine Licence Principles Document (J9 F05), in the unlikely event that a reduction in water depth of more than 5% is necessary for the shallow nearshore environment the Applicant anticipates NRW (A) will be a consultee in respect of agreeing any requirement for further consideration of benthic subtidal and intertidal ecology and the scope of this with the licencing authority as part of the NRW marine licencing process for the transmission works.. The outcomes of these discussions will determine whether any further assessment of impacts to benthic subtidal ecology receptors is required as a result of changes to physical processes.
Q2.17.6	The Applicant	**Close proximity to the works** The Mitigation and Monitoring Schedule [REP4-013] reference no 10 notes that material arising	With respect to the assessments presented in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), references to material arising from drilling and/or sandwave clearance being deposited in close proximity to the works means material would be

Ref. No.	Question to:	Written Question	Applicant's response
		from drilling and/or sandwave clearance would be deposited in close proximity to the works. Can you clarify what is meant by close proximity to the works and what distance parameters and constraints were considered under the maximum design scenario. For example, could sandwave clearance on the Constable Bank result in material arising being deposited within Constable Bank?	deposited within the disposal site licence area within the Offshore Order Limits. The Applicant is not seeking to dispose of material outside the Offshore Order Limits as set out in the site characterisation reports (APP-205 and APP-206) and noting the Cefas response to NRW (REP3-089) that there was no reason to prohibit designating a single disposal site covering both the Mona Array Area and Offshore Cable Corridor. Therefore, the maximum design scenario (MDS) assumes disposal of material arising from sandwave clearance and seabed preparation within the Offshore Order Limits. From a practical perspective, in the interests of time efficiency and cost, the Applicant would aim for vessels to transit the least distance reasonably practicable, whilst ensuring deposition of material at a sufficient distance from the site of extraction to avoid it being resuspended and subsequently deposited back into its original position before completion of works at that location. The exception to this relates to drill arisings from foundation installation where the MDS assumes arisings would be deposited adjacent to the foundation, as set out in section 3.5.8 of Volume 1, Chapter 3: Project description of the Environmental Statement (APP-050). In terms of sandwave clearance on Constable Bank, noting the commitment to the development and adherence to an oCMS which includes a CSIP that will only permit sandwave clearance on the Constable Bank within the swept path area (20 m) of the cable burial tool, material would be deposited back within the Offshore Order Limits in the general vicinity of Constable Bank so that it will naturally be brought back into the sediment transport system to aid in recovery of the sandwave features.
Q2.17.7	The Applicant	**Clay with piddocks habitat – Decommissioning phase** Can you clarify if the Mitigation and Monitoring Schedule [REP4-013] reference no 12 would entail protection of the clay with piddocks habitat during the decommissioning phase.	As outlined in Table 1.1 of the Marine Licence Principles Document (J9 F05), the Applicant is not seeking to licence decommissioning activities within the dML and standalone NRW marine licence. A separate marine licence would be applied for at the relevant time and the scope of the decommissioning works would be determined by the relevant legislation and guidance at that time. An assessment of the decommissioning phase of the Mona Offshore Wind Project has been undertaken for benthic subtidal and intertidal ecology in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), which assumes that impacts would be similar to those arising during construction. If there were any deviations from the scenario assessed in the Environmental Statement they would be assessed at that stage, and any mitigation measures required to avoid or reduce impacts on the clay with piddocks habitat would be committed to as part of this separate marine licence application.
Q2.17.8	The Applicant	**Monitoring** Can you confirm the monitoring occurrence rates and timespan regarding cables monitoring and burial status (Mitigation and Monitoring Schedule [REP4-013] reference no 100).	The Outline Operations and maintenance plan (APP-198) details the frequency of the inspections and surveys that may occur during the operations and maintenance phase. Table 1.2 and Table 1.3 of the Outline Operations and maintenance plan (APP-198) confirm that inspections will be undertaken to check scour protection and cable protection coverage of subsea cables up to once every three years for the operational lifetime of the

Ref. No.	Question to:	Written Question	Applicant's response
			project. However, it is also likely that the Applicant will conduct surveys on a risk-based approach, upon local conditions as well as historic inspection data. Regarding the Offshore Export Cable, dependent on the Cable Monitoring System chosen, a continuous 'cable burial condition' may be provided based upon the rate of heating/cooling of the system in response to load change. This can be interpreted to provide a good indication of cable burial depth/status. Schedule 14, Condition 18(1)(d) of the draft DCO (C1 F06) secures the need for the Applicant to prepare a CSIP including details of cable monitoring for approval by the licencing authority.
Q2.17.9	NRW (A) JNCC	**Mitigation and monitoring measures** Can you confirm if you are satisfied with the benthic subtidal and intertidal ecology mitigation measures being put forward by the Applicant, and provide a summary of reasons if you disagree with the statement that "*no benthic subtidal and intertidal ecology monitoring to test the predictions made within the impact assessment is considered necessary*.	The Applicant is progressing with an updated SoCG with NRW (A), the latest version of which was submitted at Deadline 1 (REP1-025). Agreement on mitigation and monitoring was an ongoing topic of discussion and was subject to the resolution of matters relating to the assessment of cable protection at the nearshore zone. NRW (A) have confirmed at Deadline 4 Submission - Comments on Submissions received at Deadline 3 (REP4-105) that they are now satisfied that there should be no significant impacts to the physical processes in the shallow nearshore environment. Therefore the Applicant considers that mitigation and monitoring will be agreed with NRW (A). The Applicant is also progressing with an updated SoCG with the Joint Nature Conservation Committee (JNCC), the latest version of which was submitted at Deadline 1 (REP1-028). Agreement on mitigation and monitoring is an ongoing topic of discussion with the JNCC. The Applicant would highlight that the commitment to the monitoring of sandwave recovery is detailed in full in the Applicant's response to NRW (A)'s Deadline 3 Submission (REP4-047, REP3-090.109 to REP3-090.112) and also in the OIPMP (J15 F02) which has been submitted at Deadline 5.
Q2.17.10	The Applicant	**Cable protection – Decommissioning Phase** Can you clarify it cable protection would be removed from Subtidal habitat IEFs, Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC, and Intertidal habitat IEFs, during the decommissioning phase and if so, has the commitment to remove been secured in the dDCO?	The decision on whether to remove cable protection at the end of the Mona Offshore Wind Project lifetime, including from within the Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC, will be made at the point of decommissioning based on the relevant legislation and guidance at that time. Whilst decommissioning activities have been assessed in the Environmental Statement, as outlined in Table 1.1 of the Marine Licence Principles Document (J9 F05), the Applicant is not seeking to licence decommissioning activities within the dML and standalone NRW marine licence, and decommissioning would be licenced through a separate standalone marine licence at the relevant time (i.e. prior to decommissioning). Notwithstanding this, for the long term habitat loss impact (section 2.9.5 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054)) the Applicant has adopted a MDS approach, which has included an assessment of the potential for cable protection to remain *in situ* within the Y Fenai a Bae Conwy/Menai Strait and Conwy

Ref. No.	Question to:	Written Question	Applicant's response
			Bay SAC post-decommissioning. The Applicant notes that NRW (A) stated in their relevant representation (RR-011) that projects should produce a decommissioning plan that retains all decommissioning options (maintain, full removal and partial removal); the options for which can be assessed and refined closer to the time of decommissioning itself.
Q2.17.11	The Applicant	**Sea-pen and burrowing megafauna communities** Can the Applicant: i. using the spatial extent of an impact (noted by JNCC in its response to ExQ1 [REP3-084]) calculate the impact percentage and advise on the magnitude of impact including the significance of effects; ii. using the Mona Array Area' calculate the impact percentage and advise on the magnitude of impact including the significance of effects; and iii. undertake a supplementary assessment to address JNCC response to ExQ1 [REP3-084] using the sensitivities listed by Marine Evidence based Sensitivity Assessment (MarESA).	The Applicant directs the Examining Authority to the response it provided at Deadline 4 in its Response to JNCC ExQ1 Response (REP4-062, REP3-084.5) where this information has been provided.

2.18 Offshore Biodiversity, Ecology and Natural Environment – Marine Mammals

Table 2.18: Response to ExQ2: Offshore Biodiversity, Ecology and Natural Environment – Marine Mammals

Ref. No.	Question to:	Written Question	Applicant's response
Q2.17.12	The Applicant JNCC NRW (A)	**UXO Clearance** In order to mitigate the potential likelihood of injury from UXO clearance the Proposed Development key measures consists of an UXO staged mitigation hierarchy (avoid, low charge, high charge) an Outline MMMP [APP-207], an Outline underwater sound management strategy [APP-202] and conditions 20 and 21 (schedule 14) of the deemed marine licence [REP2-004]. Can you summarise what further data, assessment and measures would be required for a separate marine licence application (to facilitate high order clearance charges) and the expected timeframe required for a separate marine licence application and decision.	The Applicant has reviewed its position on the inclusion of high order Unexploded Ordnance (UXO) clearance in the DCO in light of JNCC's concerns and has subsequently committed to the use of low order clearance only within the dML in Schedule 14, Condition 21 (1)(a) in the draft DCO (C1 F06), which is also expected to be secured within the standalone Natural Resources Wales marine licence. This commitment has been included in reference numbers 33 and 111 of the Mitigation and Monitoring Schedule as updated at Deadline 5 (J10 F05) and the Outline Marine Mammal Mitigation Protocol (MMMP) and the Outline UWSMS will be updated accordingly at Deadline 6. The Applicant confirms that if high order clearance is required, it will apply for a separate marine licence for high order clearance only. In line with JNCC's Response to the Examining Authority's written questions and requests for information (REP3-084) the Applicant believes this will resolve JNCC's concerns, however, the Applicant has provided further information below in response to the ExA's written question regarding the potential requirement for a separate marine licence for all UXO clearance activities, in the event that this was required. The Applicant highlights, as per section 1.3.3 of the UXO Clearance Position Statement (REP4-086), that information submitted to support a separate marine licence application for both high and low order UXO clearance would be identical to that included in the UXO method statement and MMMP required under Condition 21 of the dDCO and consulted on with the statutory nature conservation body (i.e. JNCC). Whilst a separate marine licence application would be based on a more refined MDS (in terms of UXO numbers to that considered in the Environmental Statement), the clearance methodology, location plan, clearance programme and MMMP in the marine licence application would contain the exact same information that will be provided through Condition 21 of the dDCO (C1 F06) and expected to be secured within the standalone NRW marine licence. The Applicant highlights that a separate ML would rely on an MDS approach for UXO clearance that includes for high-order clearance as has been used in the DCO application (as the ability for high-order clearance would need to be retained should the attempt by low-order techniques fail). The Applicant notes JNCC's Relevant Representation (RR-033) comments that new mitigation guidance for UXO clearance is expected to be published soon. The Applicant confirmed that it will review and align with any new guidance when this

Ref. No.	Question to:	Written Question	Applicant's response
			becomes available (see RR-033.45 in the Applicant's Response to Relevant Representations (PDA-008)) (the Applicant notes draft guidance on UXO clearance is available (from October 2023) but to their knowledge, final guidelines have not yet been released). The MMMP and UWSMS approach is purposely designed to enable the Applicant to take into account any emerging guidance or policy requirements with respect to mitigation during the preparation of the final MMMP and UWSMS post consent, which must be approved in writing by the licensing authority in consultation with the relevant stakeholders. Section 8 on timescales for determining a marine licence application on the NRW webpage 'Applying for a Marine Licence'[1] states that there are no statutory timescales for determining ML licence applications. However, the NRW webpage states that they do have agreements on determination timescales in place called service level agreements (SLAs). These are 6 weeks for band 1 applications and 4 months for band 2 applications. Band 3 applications do not have an SLA for determination timescales and the NRW webpage states that average timescales can range from 5 to 14 months up to a maximum of 25 months. UXO clearance activities are not specifically listed, but as the NRW webpage states that band 1 activities relate to low-risk activities, it is expected that UXO clearance would fall under band 2 or 3 and therefore 4 or 5 - 14 month (average) determination timelines respectively. The NRW webpage advises that band 1 and 2 timescales start once a completed application is received but will be re-started upon receipt of further information if requested by NRW. Notwithstanding the above, the lack of statutory timescales for marine licensing can lead to substantially longer determination timescales. This uncertainty can present significant challenges to project scheduling in the pre-construction period, when there are significant and complex interlinkages between engineering activities to finalise the project design and the preparation and discharge of pre-commencement conditions. Any uncertainty in the pre-construction programme has the potential to significant impact the timely delivery of the Mona Offshore Wind Project.
Q2.17.13	The Applicant	**Mitigation and Monitoring Schedule** Reference no 35 in the Mitigation and Monitoring Schedule [REP4-013] relates to Underwater	The UWSMS applies to both the generation and transmission infrastructure and, therefore, applies to the Mona Array Area as well as the transmission marine licence area. As presented in Reference no. 35 in the Mitigation and Monitoring Schedule (REP4-013), the UWSMS is secured within the deemed marine licence in

[1] Natural Resources Wales webpage 'Applying for a Marine Licence' located at: https://naturalresources.wales/permits-and-permissions/marine-licensing/applying-for-a-marine-licence/?lang=en

Ref. No.	Question to:	Written Question	Applicant's response
		Sound Management Strategy (UWSMS) that incudes for consideration of Noise Abatement Systems (NAS) as part of mitigation options. Can you clarify the statement *….and is expected to be secured within the standalone Natural Resources Wales marine licence* (that appears in means of securing the commitment). As the standalone Natural Resources Wales marine licence would be for the transmission assets, can you confirm what measure would be in place for Array area.	Schedule 14, Condition 20(1) of the draft DCO (C1 F06) and is expected to be secured within the standalone Natural Resources Wales marine licence. Whilst the UWSMS is secured under the two different marine licences, the Applicant anticipates a single UWSMS will be provided to NRW for all offshore elements of the Mona Offshore Wind Project. For licensable activities located in Welsh offshore waters (i.e. in respect of the generation assets), a marine licence will be deemed under the DCO (as a 'deemed marine licence' or 'dML'). The dML will cover works related to the offshore wind farm generation infrastructure (wind turbines, Offshore Substation Platforms (OSPs), inter-array cables and interconnector cables. A separate, standalone marine licence granted by NRW will be required for activities within 12 nautical miles (nm) of the Welsh coast and will cover works associated with the offshore export cables, interconnector cables, OSPs, Mona Offshore Cable Corridor and Access Areas. The OSPs are included in both the standalone NRW marine licence application and the DCO/dML application as it has not yet been determined whether they would be generation infrastructure (therefore covered in the dML) or transmission infrastructure (therefore covered in the standalone NRW marine licence). As the detailed design of the Mona Offshore Wind Project will only be done once consent is secured, it is not possible at this stage to determine where the OSPs will be located within the generation area and, hence, the location of the transmission works. This means that the transmission marine licence area includes all of the generation licence area where the wind turbines will be located
Q2.17.14	JNCC The Applicant	**Marine mammal receptors** Can you provide an update regarding marine mammal receptors (reference JNCC.MM.10 in the SoCG with JNCC [REP1-028]) and summarise any remaining principal points of disagreement.	The JNCC has not raised the sensitivity of marine mammal receptors as a concern in their Relevant Representations or Written Representations (see latest examination documents Deadline 2 Submission - Response to Relevant Representation Comments (REP2-097) and Deadline 3 Submission - Response to Written Representation Comments (REP3-086)). The Applicant has engaged further with the JNCC and considers there is no remaining point of disagreement with respect to this matter, and this is expected to be reflected in the final SoCG submitted at Deadline 7.
Q2.17.15	JNCC The Applicant	**Impacts to marine mammals from impact piling (project alone and cumulatively)** Can you provide an update regarding Impacts to marine mammals from impact piling (reference JNCC.MM.15 and JNCC.MM.18 in the SoCG with	The Applicant considers that the remaining point of disagreement with the JNCC on impacts of piling marine mammals is related to the commitment to NAS as a mitigation measure. The Applicant has updated the outline MMMP (J21 F02) and the outline UWSMS (J16 F02) at Deadline 5 to make sure NAS are appropriately identified as a secondary (i.e. additional mitigation) measure in accordance with IEMA guidance

Ref. No.	Question to:	Written Question	Applicant's response
		JNCC [REP1-028]) and summarise any remaining principal points of disagreement.	(2024), rather than a tertiary measure (i.e. a standard industry measure). The Applicant has clarified throughout examination that the terms 'primary', 'secondary' and 'tertiary' do not indicate priority or hierarchy over one another but are IEMA terms to classify impact assessment mitigation. As detailed in Volume 2, Chapter 4: Marine mammals (APP-056) a stepped strategy post consent will be used, following the mitigation hierarchy – avoid, reduce, mitigate. The Applicant clarifies that they do not agree with JNCC's statement in the SoCG (REP1-028) "*Without mitigation, JNCC do not agree that impacts to marine mammals from impact piling will be non-significant in EIA terms"*, as there are clear commitments to both designed-in (primary) and standard industry (tertiary) mitigation measures for piling in the outline MMMP (J21 F02) and further additional (secondary) mitigation if required in the outline UWSMS (J16 F02). The UWSMS is a comprehensive approach that demonstrates the Applicant's commitment to utilising best endeavours to reduce the noise impacts of the Mona Offshore Wind Project, in the absence of any regulatory guidance on NAS. The Applicant has noted potential MMO guidance is anticipated and, as detailed in the Applicant's Response to JNCC Deadline 2 Submission (REP3-036), the final UWSMS will look at the range of NAS technologies available at that time, considering the latest underwater sound policy and published best practice guidance. The Applicant highlights the commitment to considering NAS (if required where a residual significant effect remains following refinements in project design and technology post consent) is secured through the UWSMS, with the commitment to reducing the magnitude of any impacts from underwater sound such that there is no residual significant effect on marine mammals. The final UWSMS is secured within the deemed marine licence in Schedule 14 of the draft DCO (C1 F06) and is expected to be secured within the standalone NRW marine licence. NAS is one of the options which is being considered for additional mitigation, and its implementation will be decided in consultation with the licencing authority and SNCBs, as part of the final UWSMS, prior to construction. Options for NAS are discussed within the outline UWSMS (J16 F02) in sections 1.8.2 for piling, with detail on available technologies for both at source-reductions (such as vibration hammers, or noise reduction units) and barrier systems such as bubble curtains, and section 1.8.3 for UXO clearance. The Applicant has engaged with JNCC on further updates to the outline MMMP (J21 F02) and the UWSMS (J16 F02) submitted for Examination at Deadline 5 to address JNCC's outstanding concerns on the commitment to NAS. The Applicant highlights the Final UWSMS is secured within the deemed marine licence in

Ref. No.	Question to:	Written Question	Applicant's response
			Schedule 14 of the draft DCO and expected to be secured within the standalone NRW marine licence. The Applicant considers they have provided the necessary level of mitigation through the outline MMMP (J21 F02) and the UWSMS (J16 F02) to ensure there are no significant residual effects to marine mammals from piling.
Q2.17.16	*NRW (A)* *JNCC*	***Mitigation and monitoring measures*** *Can you confirm if you are satisfied with the marine mammals mitigation measures being put forward by the Applicant, and provide a summary of reasons if you disagree with the statement in the ES Chapter 4 (Vol 2) Marine Mammals [APP-056] paragraphs 4.9.10.1 and 4.12.1.1 that "no marine mammal monitoring to test the predictions made within the impact assessment is considered necessary".*	The Applicant notes this Examination Question is directed at NRW/JNCC, however, highlights in NRW's Written Representation (REP1-056) that NRW (A) stated '*NRW (A) confirm that for marine mammals, in view of the overall conclusions in this assessment and the commitment to an UWSMS, provided the UWSMS is produced in consultation with SNCBs during the post-consent stage, marine mammal monitoring to test the predictions made within the impact assessment would not be required from a consenting perspective although any additional data collection carried out by the applicant would be welcome*.' The Applicant also confirmed (in the Applicant's Appendix to Response to WRs: NRW (REP2-080)) that monitoring of underwater sound generated by the installation of the first four piled foundations of each piled foundation type to be installed unless the authority otherwise agrees in writing, as secured in Schedule 14, Condition 25(2) of the draft development consent order (C1 F06). The JNCC requested that geophysical survey data be voluntarily submitted to the Marine Noise Registry. The Applicant confirmed in the Appendix Response to WRs: JNCC (REP2-081) that whilst this isn't a requirement under Schedule 14, Condition 29 of the draft DCO (C1 F06) and therefore doesn't require a specific commitment, this request will be considered voluntarily in line with best practice at the relevant time. The Applicant believes there have been no other requests from the JNCC for any specific or further marine mammal monitoring during pre-application and Examination.

2.19 Offshore Biodiversity, Ecology and Natural Environment – Ornithology

Table 2.19: Response to ExQ2: Offshore Biodiversity, Ecology and Natural Environment – Ornithology

Ref. No.	Question to:	Written Question	Applicant's response
Q2.17.17	The Applicant	**Table 5.139: Summary of potential environmental effects, mitigation and monitoring** Can you advise why the phase O and D columns in Table 5.139: Summary of potential environmental effects, mitigation and monitoring [REP4-007] does not align with the significance of effect for indirect impacts from underwater sound affecting prey species. For example, a tick is given in O column, but significance of effect column has no reference to O.	Indirect impacts from underwater sound affecting prey species have been scoped out of the assessment for operation in relation to offshore ornithology (see Table 5.7 in Volume 2, Chapter 5: Offshore ornithology (REP4-007)). Within Table 5.139 of Volume 2, Chapter 5: Offshore ornithology (REP4-007), the Applicant acknowledges that there should not be a tick in the operation ('O') column as indirect impacts from underwater sound affecting prey species during the operations and maintenance phase has been scoped out of the assessment. The Applicant acknowledges that a tick should also have been included in the decommissioning ('D') column for indirect impacts from underwater sound affecting prey species. This discrepancy does not follow through to the assessments and or alter the conclusions of the assessment presented in Table 5.139 of Volume 2, Chapter 5: Offshore ornithology (REP4-007). This discrepancy will be included in the errata sheet and appended to Volume 2, Chapter 5: Offshore ornithology (REP4-007) at Deadline 7.
Q2.17.18	The Applicant	**Suspended sediment concentrations** For the temporary habitat loss /disturbance and increased suspended sediment concentrations impact during decommissioning/removal the assessment has concluded no significant effects on receptors. Can you clarify the length of time calculated for suspended sediment concentrations to settle and result in no significant effect on receptors?	In the absence of quantitative information available, the effects of temporary habitat loss/disturbance and increased suspended sediment concentrations (SSC) on ornithological receptors are considered qualitatively under the impact heading 'Temporary habitat loss/disturbance and increased SSCs' and take into consideration the assessment of significance on marine fish species presented in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). The Applicant refers the ExA to paragraph 3.9.4.45 in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055) as Paragraph 3.9.4.45 in Volume 2, Chapter 3: Fish and shellfish ecology states that the decommissioning of scour protection, cable protection, foundations, inter-array, interconnector and export cables, it is assumed, would result in increases in suspended sediments and associated deposition that are no greater than what was produced during construction. The Applicant also refers the Examining Authority to paragraphs 1.9.2.9 and 1.9.2.10 in Volume 2, Chapter 1: Physical Processes (APP-053), which modelled suspended sediment level following installation works. For the inter-array cable installation, the turbidity levels return to baseline within a couple of tidal cycles following the completion of the works. For the offshore cable installation from the Mona Array Area to the nearshore region, it is stated in paragraph 1.9.2.12 in Volume 2, Chapter 1: Physical Processes (APP-053) that the influence of wind and wave action perpendicular to tidal flow will also increase dispersion and reduce SSC and any related deposition to levels indiscernible from background levels.

Ref. No.	Question to:	Written Question	Applicant's response
			Paragraph 1.9.2.50 in Volume 2, Chapter 1: Physical Processes (APP-053) states that increases in suspended sediments and potential impact on the physical features associated with decommissioning activities would be of lesser magnitude than the construction and operations and maintenance phases as it has been assumed (for the purpose of assessment) that scour and cable protection would remain *in situ*. For example, in the case of piled foundations, there would be no significant disturbance of the seabed during decommissioning as it is assumed that piles would be cut below the seabed. SSC would increase temporarily if suction caissons were removed using overpressure to release. Decommissioning of gravity bases would involve the removal of ballast, including sand sequestered during construction. This material, which may also include rock, will be disposed of off-site but within a licenced disposal site (i.e. not released back into the local system); however, a small proportion of sediment may be released during removal. As per Table 1.15 in Volume 2, Chapter 1: Physical Processes (APP-053), increases in SSC due to the removal of inter-array, interconnector and offshore export cables would be similar to those experienced during the construction phase, as retrieval would be undertaken using similar techniques to installation. The increase in suspended sediments and the potential impacts on physical features may persist during decommissioning; however, these would be temporary and localised in nature. The Applicant confirms that the effects of temporary habitat loss /disturbance and increased SSC on ornithological receptors during the decommissioning phase have been considered in Volume 2, Chapter 5: Offshore ornithology (REP4-007) and the conclusion of minor adverse effect (not significant in EIA terms) is robust.
Q2.17.19	*NRW (A)* *JNCC*	***Mitigation and monitoring measures*** *Can you confirm if you are satisfied with the offshore ornithology mitigation measures being put forward by the Applicant, and provide a summary of reasons if you disagree with the statement in the ES Chapter 5 (Vol 2) Offshore ornithology [REP4-007] paragraph 5.7.8.1 that "no future monitoring is considered given the level of certainty around the potential effects".*	The Applicant wishes to highlight that it has committed to several measures to reduce potential impacts on offshore ornithology receptors. This includes: • A minimum air draught of 34 m above Lowest Astronomical Tide (LAT) to reduce the impacts from collision and assist birds flying under the wind turbines (See Table 4 of Schedule 14 of the draft DCO (C1 F06)) • Industry best practice measures to minimise disturbance to marine mammals and rafting birds from transiting vessels as set out in the Measures To Minimise Disturbance To Marine Mammals And Rafting Birds From Transiting Vessels (J17 F03) (See condition 18(1)(e)(iv) of the draft DCO (C1 F06)) • A seasonal restriction on offshore export cable laying and UXO clearance within the Liverpool Bay/Bae Lerpwl SPA between 1 November to 31 March to reduce disturbance to sensitive features including common scoter and red-throated diver during the overwintering period as set out in the Measures To Minimise

Ref. No.	Question to:	Written Question	Applicant's response
			Disturbance To Marine Mammals And Rafting Birds From Transiting Vessels (J17 F03). (See condition 18(1)(e)(iv) of the draft DCO C1 F06)) The Applicant is not proposing future monitoring, given the level of confidence associated with the predictions presented in the assessment ,and its conclusions and the standard and effective mitigation being applied.

2.20 Onshore Biodiversity, Ecology and the Natural Environment

Table 2.20: Response to ExQ2: Onshore Biodiversity, Ecology and the Natural Environment

Ref. No.	Question to	Written Question	Applicant's response
Q2.18.1	The Applicant	**Impacts related to pollution caused by accidental spills/contaminant** Can you clarify if impacts related to pollution caused by accidental spills/contaminant has been scoped out or assessed. The ES Chapter 4 (Vol 3) Onshore and intertidal ornithology [APP-067], paragraph 4.1.13.1.1 (first and second bullet points) refers to Table 4.41 and Table 4.42 and pollution caused by accidental spills/contaminant but Table 4.9: Impacts scoped out of the assessment for onshore and intertidal ornithology indicates otherwise.	The Applicant confirms that the impact related to pollution caused by accidental spills/contaminant release during the operation and maintenance phase was scoped out of the onshore and intertidal ornithology assessment (see Table 4.9 of APP-067). This approach was agreed by the Planning Inspectorate in their scoping response (see Table 4.7 of APP-067). Pollution caused by accidental spills/contaminant during construction and decommissioning was considered within the overall assessment of habitat loss. The potential for pollution caused by accidental spills/ containment release will be minimised through the implementation of measures within the Spillage and Emergency Response Plan. The Spillage and Emergency Response Plan is part of the Code of Construction Practice, which is secured as Requirement 9(2)(a) of the DCO and will be agreed with the relevant planning authority prior to commencement of construction. An Outline Spillage and Emergency Response Plan is included in the DCO application (REP2-040). Potential impacts of habitat loss (including from pollution caused by accidental spills/contaminant release) are identified to be minor adverse, which are not significant.
Q2.18.2	The Applicant	**Tier 2 Impacts** Can you clarify why no Tier 2 impacts have been identified in ES Chapter 3 (Vol 3) Onshore ecology [APP-066] its Table 3.35. Summary of potential cumulative environmental effects, mitigation, and monitoring.	The Applicant confirms that Table 3.35 of APP-066 does not include potential cumulative impacts from Tier 2 projects because no Tier 2 projects were identified during the screening of cumulative projects (see Cumulative effects screening matrix (APP-084)). Tier 2 projects are those projects for which a scoping report has been submitted and is in the public domain. The projects considered in the Onshore ecology cumulative assessment are set out in Table 3.32 of Volume 3, Chapter 3: Onshore ecology (APP-066).
Q2.18.3	The Applicant	**Tree survey and arboricultural impact assessment** Can you confirm the location, habitat type and size (in m2) of the unsurveys areas in the tree survey and arboricultural impact assessment.	The Applicant confirms that the areas of trees within the Order Limits that were not surveyed during 2023 and 2024 are shown on the Tree Survey Clarification Note: Appendix 17.5 Updated Tree Survey Plan Part 3 (REP3-054). The areas that were not surveyed include the 400 kV grid connection cable corridor, the onshore substation temporary and permanent access and the ecological mitigation areas to the east of the onshore substation platform. This equates to approximately 170,840 m^2. All of these land parcels were identified as improved grassland boarded with hedgerows of varying quality during the Phase 1 Extended Phase 1 habitat survey (APP-122). The Applicant has committed to undertake the surveys of these areas prior to any works in this stage commencing as defined in Requirement 4 of the DCO (Outline Arboriculture Method Statement (J26.18 F03)).

Ref. No.	Question to	Written Question	Applicant's response
Q2.18.4	The Applicant	**Tree Preservation Order** Can you confirm if any trees protected by a Tree Preservation Order would be removed, and whether any inconsistencies remain between TPO positional data supplied by local authorities and the physical locations of the trees mapped in by the Applicant.	The Applicant can confirm that two trees within Tree Preservation Order (TPO) W4 (as shown on The Tree and Hedgerow Plan (B14 F03)) will be removed to support the construction of the access AC-B1 on the Street Works and Access to Works Plan (B15 F02). The Applicant notes that there remain inconsistencies between TPO positional data supplied by Conwy County Borough Council and the physical locations of the trees mapped in the Applicant's survey. These inconsistencies were identified in the Tree Survey Clarification Note (REP3-049) and are due to trees being previously removed and the Council's TPO data not being updated.
Q2.18.5	The Applicant	**Tree removal area** Can you confirm how much of the 1,620m2 tree removal area (in the ash woodland block) is due to the Proposed Development and how much is applicable to removal of ash die back (in m2).	The Applicant confirms that 870 m^2 of the ash woodland block (area 11 on Figure 1.4 of the Outline LEMP (J22 F03)) at the Mona Onshore Substation will be removed to allow the construction of the permanent access to the Onshore Substation. The remaining area of ash woodland will be selectively cleared to remove trees affected by ash die-back and management measures implemented (as set out in the Outline LEMP J22 F03) including tree planting and natural regeneration to expand the existing areas of woodland.
Q2.18.6	The Applicant	**Woodland planning** Can you advise how an increase in woodland planting area of 60,650m2 at the Onshore Substation is secured in the dDCO.	The area of woodland planting to be provided as part of the Mona Offshore Wind Project will be defined in the final LEMP which is secured in Requirement 12 of the DCO. The area of woodland will be in accordance with the principles set out in the Design Principles (J3 F03) and the Outline LEMP (J22 F03) and will be agreed with the relevant planning authority.
Q2.18.7	The Applicant	**Planting density** The Welsh Government in its written representation [REP1-052] referred to planting density for new woodland should be at 2500 plants/ha. Can you confirm the planting density for new woodland and how would it be secured in the dDCO.	The Applicant considers that it is not appropriate to define a minimum planting density at this stage as the density should be appropriate to the site conditions and reflect the purpose of the planting. The Applicant notes it has committed to planting ratios (as set out in the Design Principles (J3 F03)) and that the density of mitigation planting (including woodland planting) will be defined in the detailed landscape plans that will be prepared during detailed design. The landscape plans will be based on the principles set out in the Outline LEMP (J22 F03) and the Design Principles (J3 F03)) and are secured in Requirement 7 of the DCO and will be agreed with the relevant planning authority through the discharge process.
Q2.18.8	The Applicant	**Important Hedgerow** The Summary of Impacts to Habitats of Principal Importance [REP3-072] notes that 550m of hedgerow would be lost and that 7 km of hedgerow would be temporarily affected. Of these values, can you confirm how much would be important hedgerow.	The location of all hedgerows surveyed within the Mona Onshore Development Area, and whether they are classified as important / not important under the Hedgerow Regulations 1997, is shown on Figures 1.2 – 1.7 in Volume 7, Annex 3.4: Hedgerow survey technical report (APP-124). The hedgerow evaluation (and impact assessment) has taken a more holistic approach with the adoption of the Natural England habitat condition assessment criteria alongside an evaluation of whether they were 'important' under the Hedgerow Regulations 1997. This provides a more conservative assessment of ecological value which recognises the

Ref. No.	Question to	Written Question	Applicant's response
			ecological importance of hedgerows which may not meet the threshold for classification as 'important' under the Hedgerow Regulations 1997. The evaluation of hedgerows as 'ecologically important' in Table 3.14 is therefore more conservative than just the application of the Hedgerow Regulation 1997 in identifying high value hedgerows. The Applicant has assessed that up to 550m of hedgerow will be permanently lost and up to 7km of hedgerow will be temporarily affected. However it is unlikely that all of this hedgerow habitat will be removed for both open trenching and the haul road as the Mona Offshore Wind Project will seek to use existing gaps in hedgerows to avoid the removal of hedgerow habitat (Volume 3, Chapter 3: Onshore ecology (APP-066). The Applicant notes there are a number of crossing locations where the crossing methodology has not been determined and therefore the lengths of hedgerows affected within each category cannot be defined at this stage. When the crossing methodologies have been confirmed during detailed design, the Applicant will prepare a table of hedgerow crossings (within the final LEMP) to identify the Natural England habitat condition assessment and whether they meet the threshold for 'important' hedgerow under the Hedgerow Regulations 1997.
Q2.18.9	The Applicant	**Habitats and Species** Can you clarify why during the operation phase, onshore and intertidal ornithology identifies impacts related to temporary and permanent habitat loss, and habitat fragmentation and species isolation, but such impacts are not identified for ecology?	The Applicant acknowledges different approaches have been taken to assessing the potential impacts during operation and maintenance in Volume 3, Chapter 3: Onshore ecology (APP-066) and Volume 3, Chapter 4: Onshore and intertidal ecology (APP-067). While different approaches have been used, the Applicant is confident all potential impacts to both onshore ecology receptors and onshore and internal ornithology receptors have been assessed adequately. The impacts of temporary and permanent habitat loss on protected habitats and species during operation and maintenance were scoped out of the onshore ecology assessment (Table 3.9 of Volume 3, Chapter 3: Onshore ecology (APP-066)) as the activities associated with the operation and maintenance of the Mona Offshore Wind Project will not result in temporary or permanent habitat loss. The impacts of temporary and permanent habitat loss as a result of the construction of the Project are assessed in section 3.9.2 of Volume 3, Chapter 3: Onshore ecology (APP-066). Volume 3, Chapter 3: Onshore ecology (APP-066) addresses the operational impact of habitat fragmentation in paragraph 3.9.4.122. As no habitat fragmentation will take place during the operation and maintenance phase no impacts are identified, however the impacts of habitat fragmentation during the construction phase are assessed in section 3.9.4 of Volume 3, Chapter 3: Onshore ecology (APP-066). Volume 3, Chapter 4: Onshore and intertidal ecology (APP-067) has taken a different approach. The chapter considers that the physical loss of habitats during operation has the potential to affect bird populations through the lifetime of the Mona Offshore Wind Project

Ref. No.	Question to	Written Question	Applicant's response
			(i.e. reduction of available habitat which may impact survival and productivity). Both temporary and permanent habitat loss and habitat fragmentation/species isolation are considered during operation.

2.21 Other Offshore Infrastructure and Activities

Table 2.21: Response to ExQ2: Other Offshore Infrastructure and Activities

Ref. No.	Question to:	Written Question	Applicant's response
Q2.19.1	The Applicant	**Wake effects: rebuttal** Respond in full to the submissions of the Ørsted IPs on wake effects at Deadline 4 [REP4-126] [REP4- 128] [REP4-129] [REP4-130] [REP4-131]. As part of your response: • Comment on the figures quoted by the Ørsted IPs in terms project alone and cumulative effects on Annual Energy Production (AEP) for the six Ørsted projects and their materiality; • Notwithstanding your position that such an assessment is not necessary in this case, comment on the Ørsted IPs' contention that there are no fundamental practical barriers to undertaking a meaningful wake loss assessment, albeit one producing a range of likely outcomes based on educated assumptions; and • Comment on the possible approaches to disclosure of confidential information to inform such an assessment.The Applicant would also highlight that	<u>Figures provided by Orsted IPs</u> The Applicant notes the figures presented by the Ørsted IPs in REP4-129, where they suggest that preliminary modelling, commissioned by the Ørsted IPs, has indicated a range of effects between 0.9-1.7% Annual Energy Production (AEP) across their projects from the Mona Offshore Wind Project alone, and between 1.7-5.3% AEP when considered cumulatively with the Morgan and Morecambe projects. The Applicant is unable to ascertain, from the information provided, the key assumptions and inputs that the modelling has used for variables such as: • Wind resource (time period of data assumptions on atmospheric stability, turbulence and boundary layer height), • Operating performance of the Orsted IPs wind farms, other developers operational wind farms in the region, and the Applicants' project, interactions between the Orsted IPs wind farms, and • Any grid curtailment and planned an unplanned outages for all projects in the region. No information has been provided by the Orsted IPs on the methodologies employed, in particular the wake loss model that was used and how the model was set up. It is also not clear which results in the range provided relate to which of the Ørsted IPs projects. The Applicant is therefore unable to check, assess, replicate or verify the numbers provided by the Orsted IPs, and is therefore unable to provide any comment on the figures provided. The Applicant would note that without any information to explain the process undertaken to produce the figures, and how to understand and verify the results, they figures should be treated with considerable caution. <u>Wake loss assessment</u> The Applicant maintains that the submission of a wake assessment is not appropriate or necessary according to the EIA Regulations and associated guidance in NPS policy. The information within the Environmental Statement and application documents is considered more than adequate to demonstrate that the NPS policy tests have been met and therefore as such, there is no requirement to submit a further assessment. NPS EN-3, paragraph 2.8.198, states an assessment should be undertaken for all stages of the lifespan of the wind farm in accordance with the appropriate policy and guidance for

Ref. No.	Question to:	Written Question	Applicant's response
			offshore wind farm areas. The Applicant notes that there is no appropriate policy or guidance for offshore wind farm areas on which to undertake a wake loss effects assessment. An assessment of this nature is not something that has previously been undertaken for any consent application or assessment to date, and there is no guidance in existence which would allow a transparent and informed assessment to be undertaken of a new wind farm on the yield of existing operational wind farms. This creates a barrier to a meaningful assessment. Modelling of wake loss effects is dependent on accurate information of the wind farm that is being proposed as well as the existing operational wind farm (for instance their current yield, downtime, curtailment, internal wakes etc.), It is also highly dependent on the choice of model used to undertake the assessment, and the decisions made in how to run the model. It is noteworthy that there are large number of wake loss models used throughout the industry, each likely to produce different outcomes for a given scenario (noting that as set out above, understanding the inputs of the scenario is not straightforward or set out in agreed guidance). Different developers have different considerations when choosing wake loss models to use, and different approaches to how to run the models. There is no single verifiable approach that exists that could be used to produce an outcome, or range of outcomes, that would be meaningful in the context of this Examination. The Applicant would also highlight that unlike other areas where regulators have driven the development of an approach to EIA and assessment (for example the approaches of NRW, JNCC and others to ornithological assessment), the suggestion that a wake loss assessment is required is not being raised by regulators or the Government. If the need for such an assessment was a genuine policy requirement it would be being directed by the Secretary of State along with an accepted framework for quantifying the extent of effects and the measures that should be explored to mitigate effects. This is clearly not the case here. <u>Disclosure of confidential information</u> In order to model the real-world situation in the Irish Sea, as the Ørsted IPs contend is possible and should be undertaken, detailed, and commercially sensitive information would be needed not only for the Applicant's proposed development and the Ørsted IPs developments, but also for other projects in the Irish Sea that are owned and operated by other parties, none of whom are suggesting that such an assessment should be undertaken. The Applicant is not party to information from those other developers, and has no mechanism by which to request it or reason to believe they would provide it. The Applicant would also note that where an EIA is undertaken it should be in an open and transparent manner, with methodologies, models, assumptions and outputs all capable of

Ref. No.	Question to:	Written Question	Applicant's response
			being independently verified. Confidential information can be provided where it is required in law (for example details of certain protected species surveys, such as badgers), but it should not be the basis on which whole assessments are undertaken. The Applicant would also highlight that it is not, as was suggested, standard practice to use and not make available confidential information in fisheries assessments. As is demonstrated in Volume 6, Annex 6.1: Commercial fisheries technical report (APP-097) this information is provided as part of an application in order that it can be reviewed and validated by 3rd parties as part of any assessment undertaken.
Q2.19.2	The Applicant	**Wake effects: NPS EN-3 para 2.8.197** • Further to discussion at ISH4, and without repeating positions already set out in writing, provide your evidence-based interpretation of the term "close to" in the context of NPS EN-3 para 2.8.197. • Notwithstanding your ISH4 submissions about the interpretation of the term "licence" in NPS EN3 para 2.8.197, in the light of D4 submissions from the Ørsted IPs do you maintain your position that the Proposed Development does not have the potential to affect existing offshore wind activity in the Irish Sea?	It is a principle of legal interpretation that where words are not defined (as 'close' is not in paragraph 2.8.197 of NPS EN-3) they should be given their ordinary meaning. Taking the definition from the Cambridge dictionary, close means proximate or not far from. At over 30 km from the Orsted IPs projects the Mona Offshore Wind Project cannot in any sense be said to be close to those projects. It is also important to note that had it been the intention of this policy to apply to all existing offshore infrastructure the word **close** would not have been used to limit or contain circumstances when assessment required. The Applicant would also like to draw the ExA's attention to a response from The Crown Estate (TCE) to an ExA question in the Outer Dowsing Offshore Wind (Generating Station) Examination (https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010130/EN010130-001231-The%20Crown%20Estate%20-%20Responses%20to%20ExQ1.pdf) which confirms that TCE took account of wake effects, amongst other matters, when setting the 7.5 km distance between Round 4 leasing areas and other OWFs (unless otherwise agreed to be less with the relevant OWF). TCE note that this increased distance, relative to previous bidding rounds where it was 5 km, was for the purpose of de-risking the Round 4 tender process by providing additional mitigation and assurance to participants through limiting proximity to other OWFs, or in other words, ensuring they were not close to each other. The Applicant maintains its position that the Mona Offshore Wind Project does not fall within paragraph 2.8.197 and that therefore no assessment is required.
Q2.19.3	The Applicant	**Wake effects: NPS EN-3 paras 2.8.200 and 2.8.344** • In the context of NPS EN-3 paras 2.8.200 and 2.8.344, explain how the Applicant has worked with (and continues to work with) the operators of existing OWFs in the Irish Sea to	The Applicant met with representatives of the Orsted IPs on 4 July 2024 to discuss issues raised within their Relevant Representations (made as separate projects rather than as a single IP). This included discussion of wake loss. The Applicant's position remains that the matter isn't one relevant to the examination, as set out in previous submissions, and therefore has not been meeting with the Orsted IPs on this matter. The Applicant would note there are a number of other offshore wind farms

Ref. No.	Question to:	Written Question	Applicant's response
		minimise negative impacts on energy yield since these concerns were first raised in the pre-application stage? There is no need to repeat previous submissions on site selection. • Provide an update on any discussions that you have had with the Ørsted IPs on this matter since ISH4 and any progress made.	in the Irish sea who have not made representations on wake loss to this examination, and that Applicant similarly has not been meeting with them to discuss the matter. The Applicant and the Orsted IPs met on 27 November 2024 to discuss progression towards a SoCG, including setting out respective positions on wake loss. The Applicant has also sought to provide responses to submissions made by the Orsted IPs, where relevant, at Deadlines throughout the Examination, including but not limited to wake loss.
Q2.19.5	The Applicant	**Wake effects: EIA Regulations** Do you accept, as a matter of principle, that wake loss can be of relevance to the EIA Regulations in terms of assessing the impact of a project on climate (such as contribution to the abatement of fossil fuel generation within the UK grid during the operational phase)? Explain your response.	Volume 8, Annex 2.1: Greenhouse gas assessment technical report (APP-182) considers avoided emissions, the quantity of renewable energy use it enables by avoiding curtailment, the quantity of fossil fuel generation it displaces, and the associated Greenhouse Gas (GHG) impacts of both. The assessment makes a calculation of the project's GHG balance against the Department of Energy Security and Net Zero (DESNZ) long-run marginal, published by National Grid. The marginal source of energy generation displaced by new renewable generation must be based on a prediction of the future long-term trends of generation type, which has inherent uncertainty built-in. Any assessment must be considered on the basis that the long-run marginal emission of future generation may at any point include more, or less, renewables generation from other generators than the long-run marginal data set assumes. In this regard at a high level possible reduction of generation by the Orsted IPs and replacement of generation by alternative generators, is already factored into the assessment. It is also noteworthy that as the UK moves towards its 2050 net zero carbon target, the marginal source of electricity generation will likely become a combination of renewables (predominately solar and wind) and storage. Therefore, from circa 2040 onwards, comparing the Mona Offshore Wind Project's GHG impacts with the marginal source of generation is akin to comparing it with itself and has limited value. As noted in the IEMA EIA Guidance on Assessing GHG Emissions (IEMA, 2022) "the crux of significance therefore is not whether a project emits GHG emissions, nor even the magnitude of GHG emissions alone, but whether it contributes to reducing GHG emissions relative to a comparable baseline consistent with a trajectory towards net zero by 2050." The Applicant believes it is uncontentious that factoring in any potential change in the Orsted IPs generation output, when viewed against the long term-marginal source of electricity that would replace that generation, would not change the outcome of the EIA assessment for GHG net effects (see section 2.10.8 of Volume 4, Chapter 2: Climate change (APP-076)) as beneficial, and therefore of positive significance in EIA terms.

Ref. No.	Question to:	Written Question	Applicant's response
			However, the Applicant considers it could be possible to utilise the figures provided by the Orsted IPs, as referenced in ExA Q2.19.1, to provide a calculation of the effects of the project on climate, specifically the net effects on GHG emissions. This would in no way suggest agreement with those figures (as set out in the Applicant's response to Q2.19.1 above). The Applicant would need to be provided with a more detailed breakdown of the output of the figures, in particular which impacts the Orsted IPs consider relate to which project.
Q2.19.8	The Applicant The Ørsted IPs	**Statement of Common Ground** Produce a Statement of Common Ground on all issues of relevance to the Ørsted IPs. For submission at Deadline 5, with final version at Deadline 7. Add the Ørsted IPs to the Statement of Commonality.	The Applicant and representatives of the Orsted IPs met on 27 November to discuss the ExA's request for a SoCG. The parties agreed they will work towards a SOCG being submitted into the Mona examination at Deadline 6 (20 December 2024). As set out in the Statement of Commonality submitted at Deadline 5 (S_D1_7 F03) the parties have agreed that the SoCG will cover the following topics: proximity; ornithology; wake effects; aviation and radar; shipping and navigation.
Q2.19.10	Awel y Môr Offshore Wind Farm Limited The Applicant	**Offshore interaction with Awel y Môr Offshore Wind Farm (OWF)** The latest Examination Progress Tracker [REP4-089] notes that negotiations between the Applicant and Awel y Môr OWF Ltd are expected to be concluded before the close of this Examination. Specifically in relation to the crossing of the Awel y Môr OWF agreement for lease area by the Mona offshore export cable corridor: • Provide a plan showing the interaction between the Mona offshore export cable corridor and the Awel y Môr OWF agreement for lease area; and • Explain what is likely to be the vehicle for this agreement and how close it is to completion.	Mona's offshore export cable route passes through the Awel y Môr Generation Agreement for Lease area, outside of the Awel y Môr DCO Order Limits (see Annex 5 – Response to Q2.19.10). Awel y Môr have provided their approval for this overlap to The Crown Estate as part of The Applicant's process to obtain a Transmission Agreement for Lease for the export cable route. For completeness, this matter is separate to the discussions described in the Examination Progress Tracker (REP4-089) which relate to the onshore interactions between the projects in the vicinity of the National Grid Bodelwyddan substation. Those discussions are ongoing but agreement on protective provisions has not yet been reached.

2.22 Seascape and Visual Resources

Table 2.22: Response to ExQ2: Seascape and Visual Resources

Ref. No.	Question to	Written Question	Applicant's response
Q2.20.1	The Applicant	**Wireline Visualisations** The wireline visualisation provided on PDF Page 15 of [REP3-046] does not appear to show VP28-Penmon Point. Can the Applicant confirm which viewpoint this visualisation is showing, and which visualisation shows Penmon Point?	The wireline labelled viewpoint (VP) 28 (Penmon Point, Isle of Anglesey National Landscape) is a repeat of VP 1 (Mynydd y Garn trig point, Isle of Anglesey National Landscape) in the same document (REP3-046) and can be disregarded. The wireline for VP 28 (Penmon Point) is provided in Figure 56 (page 14) of Volume 6, Annex 8.6: Seascape visualisations Part 7 (Figures 47- 56) (APP-112). The Applicant has reviewed the remaining cumulative wirelines and can confirm that they have the correct viewpoint name and are not duplicates.

2.23 Socio-economics

Table 2.23: Response to ExQ2: Socio-economics

Ref. No.	Question to	Written Question	Applicant's response
Q2.21.1	*Welsh Government*	***Memorandum of Understanding*** *The Applicant has responded favourably [REP4-061] to the Welsh Government's suggestion of a 'non-legal Memorandum of Understanding' to set out key areas of joint working on areas such as community benefits, skills development, supply chains, ports and Welsh language matters. Will the Memorandum of Understanding be submitted into this Examination, and if so, when?*	Welsh Government and the Applicant met on 26 November to discuss the development of a non-legal Memorandum of Understanding and will progress to develop a broad framework that will include: • Joint working principles • Scope (including potential of linking with other significant infrastructure projects) • Roles and responsibilities • Areas of further collaboration. The parties have agreed that further meetings will take place to define further areas of collaboration which broadly follow these main headings: • Promoting regional economic development – Ports, Skills Development, Supply Chain and Foreign Direct Investment • Community Development – community benefits • Welsh Language • Health impacts The Applicant is also aware that Welsh Government is also looking to work with the Offshore Energy Alliance to propose a framework to ensure a strategic approach with significant projects and that such MoUs will provide a useful understanding of how each project will contribute to the 'in-combination' scale of opportunities for the region. The Applicant is supportive of this initiative and will actively contribute as discussions progress. The Applicant and Welsh Government intend to discuss the above matters outside of the Mona examination process, and therefore the MoU will not be submitted into the Examination.

2.24 References

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3 Annexes

A.1. Annex 1 – Q2.5.1 - Welsh Policy

A.1.1 ECON_01: Sustainable economic growth

The Applicant recognises policy ECON_01 of the 2019 WNMP, which encourages proposals to provide or promote opportunities to support local economies and facilitate co-existence and co-location where appropriate, contributing to the optimal use of the marine area.

The Applicant directs the ExA to Section 6.8.8 of Volume 2, Chapter 6: Commercial Fisheries (APP-058), where potential supply chain opportunities for local fishing vessels and employment opportunities specific to commercial fisheries receptor groups have been assessed. The Applicant also refers the ExA to Table 1.2 of the OFLCP (REP3-016), where the Applicant has made the following commitments:

- Tertiary Measure (TM) 05 commits to the development and adherence to a Fisheries Liaison and Co-existence Plan in accordance with the OFLCP (REP3-016), which includes for the use of Offshore Fisheries Liaison Officers (OFLOs) where appropriate. Local OFLOs will be used where possible to facilitate engagement with commercial fisheries stakeholders during specific activities of the Mona Offshore Wind Project. The OFLOs will promote co-existence by communicating the project's commitments and measures to the fishing industry and providing detailed project information to aid co-existence, such as site locations for use with fish plotters.
- TM 17 commits to the development and adherence to a Fisheries Liaison and Co-existence Plan in accordance with the OFLCP (REP3-016), which includes for the use of guard vessels where required. During the operational and maintenance phases, guard vessels will be deployed in areas with cable exposures that pose significant risks, until the risks are mitigated by burial or other protection methods. These vessels will ensure navigational safety, reduce gear snagging risks, and engage with commercial fisheries stakeholders to raise awareness of temporary hazards and minimize interactions with the project. Efforts will be made by the Applicant to use regional fishing vessels for guard duties where possible.

The Applicant has also made significant commitments in the design of the project to facilitate co-existence and co-location with existing commercial fisheries, allowing for continued fishing activity within the Mona Array Area and Offshore Export Cable Corridor, and thereby supporting optimal use of the marine area. These commitments are secured in the OFLCP (REP3-016) with the requirement for the Final Fisheries Liaison and Co-existence Plan (which must accord with the commitments in the OFLCP (REP3-016)) secured within Condition 18(1)(e)(v) of the deemed marine licence under Schedule 14 of the draft DCO (C1 F06) and expected to be secured within the standalone NRW marine licence).

A.1.2 FIS_01: Fisheries (supporting)

The Applicant recognises policy FIS_01 of the 2019 WNMP, which is divided into two sub-policies:

- FIS_01a: Proposals that support and enhance sustainable fishing activities will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.
  - As stated above in response to ECON_01 and as set out in section 1.3.6 of the OFLCP (REP3-016), the Applicant has made significant commitments in the design of the project to allow continued fishing activity within the Mona Array Area and Offshore Cable Corridor. These commitments made by the Applicant correspond with the relevant general policies and sector safeguarding policies outlined within the WNMP. The design commitments are not restrictive to gear types and other techniques can be used to target new species which may enhance the fishing industry.
- FIS_01b: Proposals are encouraged to liaise with interested parties, to collaborate to understand opportunities to develop a strategic evidence base to improve understanding of opportunities for the sustainable development of fisheries.
  - To affirm the assessment conclusions as presented in APP-058 and contribute to the evidence base for commercial fishing activity and offshore wind, the design commitments are also supported by the commitment to undertake monitoring of vessel monitoring system (VMS), inshore VMS (i-VMS) and landings data from the study area annually for the first five years of the operations and maintenance phase, and this monitoring is based on discussions with commercial fisheries stakeholders. The Applicant has committed to undertaking this monitoring within the OFLCP (REP3-016), secured within Condition 18(1)(e)(v) of the deemed marine licence under Schedule 14 of the draft DCO (C1 F06) and expected to be secured within the standalone NRW marine licence).
  - Additionally, commercial fisheries stakeholders consider monitoring of queen scallop to also be important to confirm the accuracy of the assessment. The Applicant has acknowledged this and has therefore added a new commitment to include a scallop monitoring programme within the revised OFLCP at Deadline 3 (REP3-016) and the revised OIPMP at Deadline 5 (J15 F02). Development of this monitoring programme will consider methodologies from other regional monitoring programmes and input from key fisheries stakeholders and will be cognisant of similar commitments made by the Morgan Offshore Wind Project: Generation Assets, where possible adopting aligned methodologies to ensure a more strategic approach is taken to the monitoring. This will serve to ensure a more comprehensive evidence base is established.

A.2. Annex 2 – Q2.13.1 - Response to Annex A Of The Nationally Significant Infrastructure Project: Advice On Good Design

Good Desing Issue to consider	Consideration	Applicant's response
Design Approach Document (DAD)	Is a DAD provided?	The Design Principles (J3 F03) forms the Design Approach Document for the Mona Offshore Wind Farm. The Design Principles focuses on the Onshore Substation, as the main aspect of permanent above ground infrastructure for the onshore elements of the Project. There is limited opportunity for the Applicant to apply good design to the offshore elements of the Mona Offshore Wind Project without impacting overall electrical output (e.g. size of turbines and offshore substation platforms) or impacting safety (e.g. colour of wind turbine bases, minimising lighting). The Applicant has committed to developing the layout of the turbines to best utilise the available wind resource and suitability of the seabed, while seeking to minimise potential environmental effects and impacts. The layout principles are available in Table 3.7 of Volume 1, Chapter 3: Project description (APP-050). The Design Principles outlines the design process (section 1.6 overview of site selection and section 4 the design review process), the design principles (section 3 design principles and parameters) and the beneficial outcomes (section 5 beneficial outcomes).
	Does the DAD address the brief, the design process, the design principles, and beneficial outcomes?	
	If a DAD is not provided, where are the design process and design principles set out?	
Analysis, Research	How has the development site been analysed to inform a good design approach?	The onshore substation site has been considered at every stage of project development. Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-016) outlines the studies undertaken to inform the selection of the site for the onshore substation and the features of the site that assist and have been factored into the substation design (for example use of existing topography and landscape screening). Further detailed technical studies have been undertaken by the engineering team and as part of the Environmental Impact Assessment. The results of all of the studies have been used to inform the design principles and parameters outline in the Design Principles (J3 F03).
	What are the main conclusions from this analysis that inform the design at this stage and as it develops?	
Response	What are the main significant adverse effects of the proposed development and how are they addressed to enable good design?	The Environmental Impact Assessment has identified the possible significant adverse effects. Each chapter of the Environmental Impact Assessment describes the embedded mitigation measures that have

Good Desing Issue to consider	Consideration	Applicant's response
		been incorporated into the project design to mitigate these effects. Further design decisions are described in the Design Principles (J3 F03).
Vision	What is the vision for the completed development and its surroundings? Where is it set out?	The Design Principles (J3 F03) has been updated at Deadline 5 to include a new Section 1.8 that more clearly state the vision for the Mona onshore substation.
	Set out the narrative, how the vision will achieve sustainability, create a new place and hold the design together.	
Skills	What professional disciplines and skill sets are being and will be working on the design of the project?	Alongside internal engineering and consenting experts, the Applicant has been advised through the design process by external specialised consultants, including landscape consultants. In addition, section 4.3 of the Design Principles (J3 F03) described the role the Design Review Panel will have in developing the detailed design post-consent.
	Is there a design champion designated for this project, and if so, who is it and what are their skills?	Section 4.2 of the Design Principles (J3 F03) described the role of Design Champion on the Mona Offshore Wind Project.
Developing the design	Describe the approach to good design and explain how the design has (and will continue) to evolve.	The Design Principles (J3 F03) explains the design process to undertaken to date, the use of the maximum design scenario (Rochdale Envelope), the emerging design principles and parameters and the next steps which will be undertaken post-consent to develop the design.
	How is any required flexibility being addressed?	
	What design choices have (and will be) made?	
	What are the emerging design principles and how have the principles directly informed decision making?	
	Is there a hierarchical approach to elements of the proposal (for example in designing major and less important bridges in a highways scheme)?	This is not relevant to the Mona Offshore Wind Project.
	Have digital techniques, including algorithms and AI been used in design development? If so, explain the tools and data used.	The Applicant can confirm algorithms and AI has been used in the development of the design in line with standard industry practice.
	Is there a coherent narrative of how the approach to design has evolved?	The Design Principles (J3 F03) outlines the design decisions taken to date and how decisions will be made post-consent to reach a detailed design.

Good Desing Issue to consider	Consideration	Applicant's response
	Where are design outcomes set out?	The Site Selection and Consideration of Alternatives chapter (AS-016) detailed the outcomes of the site selection process, the Design Principles (J3 F03) outlines the design principles and parameters that have been developed to date and will be followed through in the design of the onshore substation.
	Will additional value beyond the site boundary be incorporated?	A scheme of landscape and ecology planting is proposed around the onshore substation and a select locations along the onshore cable corridor, to improve landscape connectivity and create and improve habitats. Details can be found in the Outline Landscape and Ecology Management Plan (J22 F03). The beneficial outcomes of the project are outlined in the Design Principles (J3 F03).
Independent design review	Has the design development been the subject of an independent design review?	Project design reviews for the onshore substation were undertaken with the Design Commission for Wales in August 2023 and November 2024. The outcomes of the August 2024 design review were submitted into the examination (RR-014) and the outcomes of the November 2024 will be shared once made available by the Design Commission for Wales. The Applicant is committed to engaging with Design Commission for Wales and Denbighshire County Council post-consent as part of the development of the detailed design (see Design Principles (J3 F03)).
	If so, what were the main comments and how has the design responded to them?	
	Is it the intention to include design reviews post-consent? If so, how are these secured?	
Delivery	How will the final design be delivered? Will there be a design management plan, a design guide or a design code? If not, why are they not required?	Section 4 of the Design Principles (J3 F03) described the design review process that will be undertaken post-consent to develop the design guide and subsequently the detailed design. It includes details of engagement third parties and the process for discharging DCO requirements through the local planning authority.
	Is there a design consultation plan to engage the community following consent of the DCO?	
	Is there an agreed process for post-consent decisions with local planning authorities and others, where required?	
Place	How is placemaking being addressed?	The vision for the area around the onshore substation and beneficial outcomes of the project are detailed in the Design Principles (J3 F03).
	How will this be a distinctive place and how will the community benefit from it?	

Good Desing Issue to consider	Consideration	Applicant's response
	Describe what the quality of place outcome will be, how this relates to the vision and how it will be secured?	
People	What consultation has taken place with statutory and local authorities, communities and people with an interest in the land?	Extensive statutory and non-statutory consultation has taken place as part of the development of the Project (see the Consultation Report APP-037). In addition, the Project's land agents have been engaging with land interests since March 2022. Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-016) details how consultation feedback has shaped the project to date.
	How will their views be incorporated in the design evolution and where will this be set out?	
Integrated design approach	Explain how an integrated, holistic approach to the project's design will be achieved.	Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-016) details how, to date, design decisions have been reached by a multi-disciplinary team of engineers, planners, land advisors, legal and environmental consultants. Section 4 of the Design Principles (J3 F03) outlines how the design review panel and external experts will feed into the development of detailed design. There is no current masterplan The Applicant believes Denbighshire County Council is best placed to deliver a landscape-led masterplan for the wider area, as the Applicant has little or no influence over the design of other infrastructure projects proposed by other developers in the area surrounding the Bodelwyddan National Grid Substation.
	Where is it shown in the documentation? Is there a masterplan?	
	How will this be secured?	
National Policy Statements (NPSs)	How have the requirements for good design in the relevant NPS (or NPSs) been met?	Section 1.5.29 of the Planning Statement (APP-186) sets out how the NPS requirements in relation to good design have been met.
Design Principles	Set out the good design principles being applied to the project.	The Design Principles (J3 F03) clearly sets out the design principles and parameters that will be applied to the onshore substation. The Design Principles (J3 F03) is a certified document within the draft Development Consent Order (C1 F05). Requirements 5 of the draft Development Consent Order also requires the detailed design of the onshore substation to be in accordance with the Design Principles .
	Are the design principles structured or grouped logically?	
	How will they be developed prior to consent?	
	How will they be illustrated and secured?	
	Is there a response to the NIC's four principles of good design?	The Design Principles (J3 F03) has been updated at Deadline 5 to address the NIC's four principles of good design.
	If not, what design principles have been adopted?	

Good Desing Issue to consider	Consideration	Applicant's response
National Infrastructure Commission (NIC) 'principles'	What process has been used to develop and embed project level design principles?	

A.3. Annex 3 – Response to Q2.17.2

i. The MMO review of wind farm monitoring data has been provided (S_D5_32.1). The offshore windfarm projects within the review are as follows:

Offshore wind farm project	Location	Array Area size (km^2)	First generating year
North Hoyle	Irish Sea - off Welsh coast/Liverpool Bay	9.6	2003
Scroby Sands	East Anglia	8.9	2004
Kentish Flats	Thames Estuary	10.0	2005
Barrow	Irish Sea - off Lancashire coast/Morecambe Bay	10.0	2006
Burbo Bank	Irish Sea - off Welsh coast/Liverpool Bay	9.9	2007
Lynn and Inner Dowsing	Humber	16.7	2008
Gunfleet Sands I	Thames Estuary	10.0	2009
Rhyl Flats	Irish Sea - off Welsh coast/Liverpool Bay	9.7	2009
Robin Rigg East	Solway Firth	9.9	2009
Robin Rigg West	Solway Firth	8.5	2009
Gunfleet Sands II	Thames Estuary	5.8	2009
Greater Gabbard	East Anglia	146	2010
Thanet	Thames Estuary	35.0	2010
Ormonde	Irish Sea - off Lancashire coast/Morecambe Bay	9.9	2011
Sheringham Shoal	East Anglia	35.0	2011
Walney 1	Irish Sea - off Lancashire coast/Morecambe Bay	27.2	2011

Walney 2	Irish Sea - off Lancashire coast/Morecambe Bay	45.9	2011
Teesside	North Sea	4.3	2012
London Array	Thames Estuary	122.5	2012
Gwynt y Môr	Irish Sea - off Welsh coast/Liverpool Bay	68	2013
Lincs	Humber	38.3	2013
West of Duddon Sands	Irish Sea - off Lancashire coast/Morecambe Bay	66.9	2013

ii. The wind farms within proximity of the Mona Offshore Wind Project are as follows:

Offshore wind farm project	Operator	Distance to Mona Array Area (km)	Distance to Mona Offshore Cable Corridor and Access Areas (km)
Operational			
Gwynt y Môr	RWE Renewables	17.8	9.9
Rhyl Flats	RWE Renewables	25.6	3.8
North Hoyle	RWE npower renewables	29.6	13.7
Burbo Bank Extension	Ørsted (Burbo Extension Ltd)	30.6	30.5
Walney Extension (3 and 4)	Ørsted (Walney Extension Limited)	30.7	51.8
West of Duddon Sands	Morecambe Wind Limited	31.9	42.5
Walney 2	Ørsted (Walney (UK) Offshore Windfarms Ltd).	34.1	48.2
Walney 1	Ørsted (Walney (UK) Offshore Windfarms Ltd).	35.4	48.2
Burbo Bank	Ørsted Burbo (UK) Limited	40.3	40.2

Barrow	Ørsted (Barrow Offshore Wind Ltd).	43.3	52.5
Ormonde	Ormonde Energy Ltd.	44.0	56.5
Round 4 Projects			
Morecambe Offshore Windfarm	Zero-E Offshore Wind and Flotation Energy Limited	8.9	21.5
Morgan Generation Assets	Bp/EnBW (Morgan Offshore Wind Ltd.)	11.1	31.0
Consented			
Awel y Môr	RWE Renewables	13.5	3.5
Proposed/scoping			
Mooir Vannin	Ørsted	34.5	59.9

Regarding the use of monitoring from other offshore wind farms, the Applicant has considered the following:

Benthic subtidal and intertidal ecology

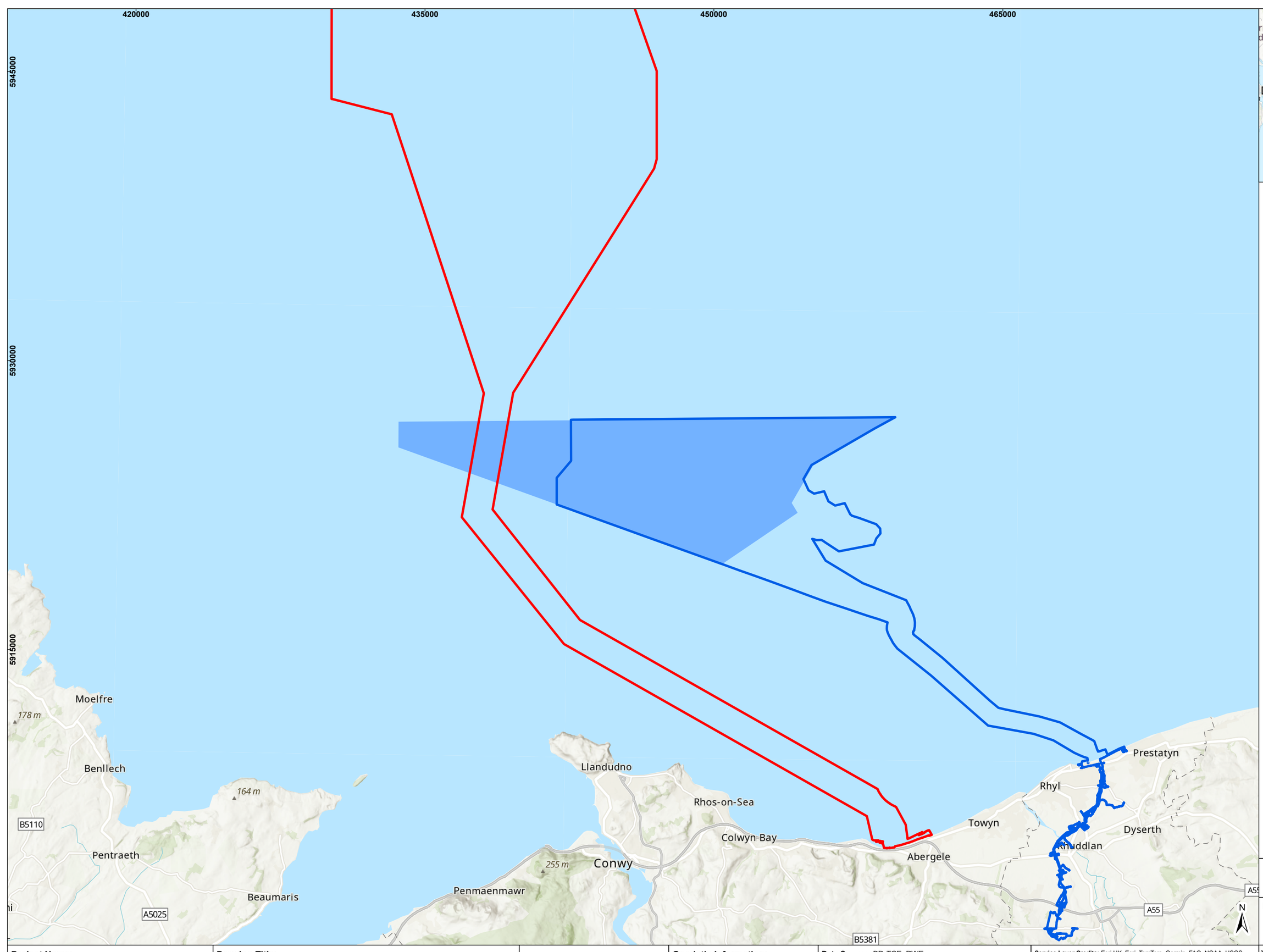
- Burbo Bank extension benthic and Annex I habitat pre-construction survey (2015)
- Walney Year 3 post-consent benthic monitoring survey report (2014)
- Walney Year 2 post-consent benthic monitoring survey report (2013)
- Ormonde Year 1 post-construction benthic environmental monitoring survey (2012)
- Burbo Bank Year 3 post-construction benthic monitoring survey (2010)
- Burbo Bank pre-construction contaminants investigation (2005)

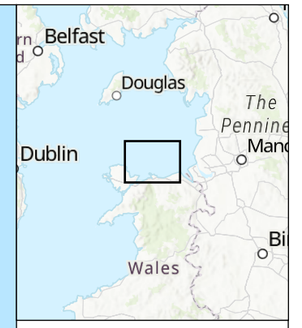
Fish and shellfish ecology

- Burbo Bank Offshore Wind Farm, Preconstruction Commercial Fish Survey (2 m Beam Trawl) (2006)
- Burbo Bank Offshore Wind Farm, Pre-construction Commercial Fish Survey (2 m Beam Trawl) (2006)
- Walney Offshore Wind Farm Pre-Construction Fish Survey (2009)
- Ormonde Offshore Wind Farm Pre-Construction Juvenile & Adult Fish Survey (2009)
- Burbo Bank Offshore Wind Farm, Post-construction (Year 3) Commercial Fish Survey (2010)

- Ormonde Offshore Wind Farm, Construction (Year 1) Environmental Monitoring (2010)
- Gwynt y Mor Offshore Wind Farm, Pre-construction Baseline Beam Trawl Data (2011)
- Ormonde Offshore Wind Farm, Adult and Juvenile Fish and Epi-benthic Post-construction survey (2012 – 2014)
- West of Duddon Sands Offshore Wind Farm, Adult and Juvenile Fish and Epibenthic Pre-Construction Surveys (2012)
- Walney Offshore Wind Farm, Year 2 Post-construction Monitoring Fish and Epibenthic Survey (2013)

A.4. Annex 4 – Response to Q2.19.10





LEGEND

- Mona Offshore Order Limits
- Awel y Môr Order Limits
- Awel y Môr Generation AfL Area

Partners in UK offshore wind

Drawing Number:

Project Name:
MONA OFFSHORE WIND FARM

Drawing Title:
MONA OFFSHORE ORDER LIMITS AND AWEL Y MÔR ORDER LIMITS AND AFL

0 2.5 5 km

Geodetic Information:
Datum: ETRS 1989
Projection: ETRS 1989 UTM Zone 30N
Scale@A3: 1:175,000

Data Sources: BP, TCE, RWE

VER	DATE	DETAILS	BY	CHECK
01	25/11/24	First Issue	TD	PC
02	29/11/24	Legend Updates	TD	PC