Partners in UK offshore wind

MONA OFFSHORE WIND PROJECT

Response to NRW D5 Submission

Deadline: 6

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Image of an offshore wind farm

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Prepared by:

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Prepared for:

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Glossary

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

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

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

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

Acronyms

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

Units

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

1 Response to NRW's D5 Submission

1.1 Introduction

1.1.1.1 The Applicant has responded to NRW's D5 submission below.

2 Response to NRW D5 Submission

2.1 Natural Resource Wales – Offshore Ornithology

Table 2.1: REP5-098 – NRW Offshore Ornithology

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-098.1	**1 OFFSHORE** **1.1 Marine Ornithology** **1.1.1 Comments on Updated Environmental Statement: Volume 2, Chapter 5: Offshore Ornithology F03 [REP4-007: clean; REP4-008: tracked]** .	The Applicant has responded to NRW (A)'s offshore ornithology comments in document Update on offshore ornithology principal matters S_D6_20.

2.2 Natural Resource Wales – Marine Mammals

Table 2.2: REP5-098 – NRW Marine Mammals

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-098.43	**1.2 Marine Mammals** **1.2.1 Comments on response to NRW Deadline 3 Submission [REP4-047]** **1.2.1.1 REP3-090.66 - REP3-090.72** 45. We acknowledge the Applicant's response, and note that this issue was discussed at a meeting on Friday 8 November 2024, where it was agreed that for the purposes of the Statement of Common Ground (SoCG), the position status of this matter would be noted as "*not agreed – no material impact*," with the Applicant agreeing to clarify that the estimates of the	Following discussions with NRW (A) on 8 November 2024, the Applicant confirmed in its Response to NRW D4 Submission (REP5-061) (see row REP4-105.47) at Deadline 5, that the methodology used to assess disturbance from underwater sound from vessels represents a single point in time. The Applicant welcomes the confirmation that NRW(A) did not have concerns with the fixed impact radius approach and agreement that the radius used in the impact assessment in Volume 2, Chapter 4: Marine Mammals (APP-056) was conservative in nature.

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	number of animals disturbed represent a conservative estimate at a single point in time from a single vessel (i.e. “a snapshot”).	The Statement of Common Ground (SoCG) between Mona Offshore Wind Project and NRW (A) – Offshore (S_D1_12 F02) has been updated at Deadline 6 to reflect the agreement on this matter (see row NRW.MM.15). The Applicant notes NRW (A)’s comments on the development of the DEPONS2 model and Interim Population Consequences of Disturbance (iPCoD) framework and will consider these for potential future projects.
REP5-098.44	46. In our Deadline 4 submission, NRW (A) explained that the main reason for our concern was that in our view a static radius did not capture the cumulative impact of a pathway which consisted of chronic, but individually relatively small disturbance events from a moving source / sources. While we agreed with the Applicant that recovery from vessel noise disturbance took place relatively rapidly, we did not agree with the general assumption underpinning the Applicant’s approach that because recovery from a single disturbance event would be rapid, then there would not be an effect from repeated episodes of disturbance as a result of there being multiple vessel trips in the area.	
REP5-098.45	47. We explained that in principle we had no concerns with the use of a fixed impact radius to provide a snapshot estimate of numbers disturbed at one point in time, and we also fully agreed with the Applicant that the radius selected was a conservative one. However, we advised that the Applicant needed to be clear in the assessment that the estimate was a snapshot at a single point in time, otherwise it would be inaccurate to state that e.g. 0.02% of the harbour porpoise Management Unit (MU) will be disturbed, particularly so that future projects drawing down information from the Mona Offshore Windfarm ES application have access to the correct information.	
REP5-098.46	48. We draw attention to the fact that the most recent version of the DEPONS2 model for simulating population effects of noise for harbour porpoises (V3.0) now makes it possible to simulate the population impact of noise from ships. Similarly work is being done to further develop Dynamic Energy Budget (DEB) models for their eventual inclusion into the Interim Population Consequences of Disturbance (iPCoD) framework (Harwood et al 2022), noting that King et al (2015) suggested that other impact pathways (such as noise from seismic surveys and / or vessels) can be included into iPCoD by using estimates of the number of animals predicted to be disturbed by these activities and their extent in time and space.	
REP5-098.47	49. Given that agreement was reached on a way forward, we consider this matter closed.	

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-098.48	**1.2.1.2 REP3-090.77** 50. NRW(A) acknowledges and welcomes the statement from the Applicant that they are committed to implementing a suitable approach for monitoring underwater sound from the impact piling of the first four foundations in agreement with the relevant SNCBs. We understand that at present it may not be possible to confirm a provider.	The Applicant welcomes NRW (A)'s comment. Following further consideration, the Applicant can confirm that it shall adhere to the requirements and recommendations as set out in ISO18406:2017 (Measurement of radiated underwater sound from percussive pile driving) and ISO18405:2017 (Underwater acoustics Terminology). In light of this, the Applicant considers this matter to be closed.
REP5-098.49	51. We point out that ISO18406:2017 was intended as a generic approach to be compatible, without significant additional effort, with the measurement methodologies of countries which currently require measurements of piling for regulatory purposes. It reflects and was based on existing guidance and good practice for noise measurements used in countries such as Germany, the Netherlands, the UK (NPL Good Practice Guide No. 133), and the US. As the standard was published in 2017 we would expect service providers to use a methodology which meets existing guidance and the requirements in the standard.	
REP5-098.50	52. Key features include requirements for: • At least one measurement location which measures the entire piling sequence. If only one range used, it shall be 750 m from the pile. • Recommends additional measurement locations along specified transects, the minimum measuring distance being three times the water depth. • A hydrophone depth of >2 m above the seabed and >half the water depth, ideally using two hydrophones where possible • Measurement bandwidth covering the frequency range 20 Hz to 20 kHz, with the hydrophone calibrated over the full range of interest • Use of terms and reporting of metrics to be consistent with ISO 18405:2017, the new standard on 'Underwater acoustical terminology'.	
REP5-098.51	53. To provide consistency and comparability the standard provides information on how to calculate these metrics. It also covers	

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	recommendations on choice of hydrophone, instrumentation, deployment etc - all of which are covered in NPL GPG No. 133.	
REP5-098.52	**1.2.1.3 REP3-090.78** 54. Whilst we still consider that it would be helpful for the report to provide additional clarity with respect to the MDS for the Offshore Substation Platforms (OSPs) – this is for completeness and in order to help future projects using the Mona information in their project considerations - we note the Applicant's response which states that they do not consider an update is necessary. We have no further comments in this regard.	The Applicant notes NRW (A)'s comments and considers this matter closed.
REP5-098.53	**1.2.1.4 REP3-090.79 - REP3-090.82** 55. NRW (A) confirms that we still agree that "*this does not materially affect the conclusions, since assessment results were based on the full response modelled range of disturbance*".	The Applicant welcomes the confirmation from NRW (A) that this matter does not materially affect the conclusions and agreement that this discussion has run its course. The Applicant agrees with NRW (A) that this matter is closed. The SoCG between Mona Offshore Wind Project and NRW (A) – Offshore (S_D1_12 F02) has been updated at Deadline 6 to reflect the agreement on the approach to underwater sound modelling and assessment of underwater sound impacts (see row NRW.MM.10).
REP5-098.54	56. We also confirm that we are in full agreement that particularly given the findings and strong body of evidence from the RADIN project (ORJIP 2024), which built on the work of Martin et al. 2020 and Graham et al. 2019, there is no reasonable doubt that changes in impulsivity affect the rate of Permanent Threshold Shift (PTS) and Temporary Threshold Shift (TTS) growth. Similarly, criteria for TTS and PTS onset are based on cumulative exposure over all impulsive noise events, without taking into account recovery of hearing between successive impulses and as a result this leads to overestimates of the range of TTS and PTS onset. Some studies have also shown that exposures to noise with equal cumulative sound exposure level (SELcum) but with different lengths of time between noise pulses do not result in the same amount of TTS (e.g. Kastelein et al 2014; von Benda Beckman et al 2020, 2022). This information is also outlined in our relevant position statement on assessing the effects of hearing injury (NRW 2023). We therefore would like to clarify that this matter related solely to behavioural disturbance.	
REP5-098.55	57. We agree with the Applicant that the probability of a response is influenced by an interplay between a number of factors. Among others these include environmental factors (e.g. water depth, temperature, sediment type) which can impact noise propagation, aspects of the sound (e.g. waveform,	

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	length of signal, continuous / intermittent exposure), and contextual factors related to the animals themselves (e.g. differences between species and individuals, group effects, and situational contexts such as foraging, breeding, presence of calves, previous exposure to a noise etc). However, the extent of the importance of each of these in influencing behaviour is currently not well known. In their 2021 publication, Southall et al. presented a framework to guide future data collection efforts on noise disturbance where it was recommended that when collecting behavioural response data, a number of contextual metrics should also be recorded in a comprehensive and consistent manner. Future studies accounting for these would provide far more accurate probability functions for predicting behavioural effects.	
REP5-098.56	58. In their framework, Southall et al. (2021) drop the approach of categorising sound as either “impulsive” or “non-impulsive” because of the wide diversity of sound types, including some noise sources which produce impulsive sounds near the source but non-impulsive sounds at greater ranges. They explain that these categories were geared more towards evaluating auditory effects such as temporary threshold shifts in hearing (but are less suitable for evaluating behaviour). Instead, their framework groups sounds by operational source types (e.g. pile driving, sonar, seismic air guns etc) that share some general contextual similarities, and advocates reporting a wide number of acoustic metrics to more comprehensively describe the noise signals. Our understanding is that this is done to capture as many potential variables that may impact behavioural response to support integrated analyses of exposure-response relationships.	
REP5-098.57	59. The publication does not make any conclusions regarding the impact (or extent of the impact) of changes in impulsivity on disturbance. Our view remains that Par 1.5.7.4 of APP-079 presents a message from a scientific publication as a more definite fact, applying it without the uncertainty and nuance that should accompany it.	
REP5-098.58	60. As mentioned in previous responses we would expect such a statement to be supported by evidence which links changes in impulsivity to declines in the probability of a behavioural reaction (similar to the body of evidence that exists for PTS / TTS), while also accounting for the extent of the influence of other factors. While we do consider it likely that changes in impulsivity will have some effect on the probability of a behavioural response, particularly	

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	when applying thresholds at ranges further away than the observations on which they were based, the degree of this effect is currently unknown and it is also possible that the overall impact may be small or negligible compared to other factors. The statement that "*great caution should be used when interpreting potential disturbance ranges in the order of tens of kilometres*" (Section 1.5.7 of APP-079) which suggests that existing dose response curves are over-precautionary, requires analysis based on data collected in the field, and at present there is insufficient evidence to conclude this.	
REP5-098.59	61. While this matter is principally an academic discussion with no material impact on the result, we stress the importance of presenting a nuanced approach when making statements about aspects of disturbance from underwater noise for which where there are still high levels of uncertainty. Although we still recommend that ideally the Applicant clarify the hypothetical nature of their statement, and that the discussions on this matter are taken onboard for future applications, we agree that this discussion has run its course and can consider this matter closed.	
REP5-098.60	**1.2.2 Comments on UXO Clearance Position Statement [REP4-086]** 62. We note that this document was drafted in response to the concerns raised by JNCC with respect to UXO clearance. However, we note that this matter is also of importance to NRW (A). Our position on the use of different UXO clearance methods (low-order cf high-order) are clearly stated in our written representations [REP1-056], and we confirm that our view remains that all UXO clearance is restricted to low-noise methods only, and that high order clearance should only be used in exceptional circumstances.	The Applicant confirms it has reviewed its position on the inclusion of high order Unexploded Ordnance (UXO) clearance in the Draft Development Consent Order (DCO) in light of the SNCBs concerns and has subsequently committed to the use of low order clearance only (i.e. UXO clearance method which does not seek to detonate the unexploded ordnance). High order UXO clearance will not be authorised under the Draft DCO or the standalone NRW Marine Licence (ML). This is reflected in the updated drafting of the deemed marine licence in Schedule 14, Condition 21 in the Draft DCO made at Deadline 5 (REP5-006), and for clarity, the Marine Licence Principles Document (REP5-022) has been updated to remove high order UXO clearance from the NRW marine licence application. This commitment has been included in reference numbers 33 and 111 of the Mitigation and Monitoring Schedule (REP5-024), the Outline Marine Mammal Mitigation Protocol (MMMP) (REP5-032) and the Outline UWSMS (REP5-028) updated at Deadline 5. The Applicant confirms that if high order UXO clearance (i.e. UXO clearance method, which intentionally seeks to detonate the unexploded ordnance) is required, this will be subject to a separate marine licence application.
REP5-098.61	63. As previously noted, NRW is currently a signatory to the 2022 Joint Interim Position Statement on UXO Clearance3. Please be advised that an updated Position Statement is currently in development (which we are contributing to) and may be published prior to the completion of this examination process. If this is published during the examination process we will draw the Examining Authority and the Applicant's attention to this document immediately.	
REP5-098.62	64. We understand from recent correspondence with the Applicant (02 December 2024), that it is their intention to remove high-order clearance	

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	options from the draft development consent order (dDCO) and its associated deemed Marine Licence (dML) as well as the stand-alone Marine Licence. **This intention will effectively restrict UXO clearance to low-order methods only**. Once this information is submitted into the examination at Deadline 5, we will provide further advice.	Therefore, in agreement with NRW (A)'s position, UXO clearance under the DCO will be restricted to low order, and high order clearance will only be used where necessary, subject to a separate marine licence. The SoCG between Mona Offshore Wind Project and NRW (A) – Offshore (S_D1_12 F02) has been updated at Deadline 6 to reflect the agreement between the parties on Condition 21 of the draft DCO (C1 F07) and that the Outline MMMP (REP5-032) and UWSMS (REP5-028) are appropriate and will ensure significant effects are avoided (see row NRW.MM.19). The Applicant welcomes NRW (A)'s notification of an updated Joint Position Statement on UXO clearance to be published and will review the guidance when it is released.

2.3 Natural Resource Wales – Fish and Shellfish

Table 2.3: REP5-098 – NRW Fish and Shellfish

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-098.63	**1.3 Fish and Shellfish** **1.3.1 Comments on UXO Clearance Position Statement [REP4-086]** 65. NRW(A) welcome the Applicant's confirmation that they will adhere to the mitigation hierarchy in respect to the UXO clearance activities. We understand from recent correspondence with the Applicant (02 December 2024), that it is their intention to remove high-order clearance options from the draft development consent order (dDCO) and its associated deemed Marine Licence (dML) as well as the stand-alone Marine Licence. This intention will effectively restrict UXO clearance to low-order methods only. Once this information is submitted into the examination at Deadline 5, we will provide further advice with respect to the above.	The Applicant notes NRW (A)'s response and refers to its response to REP5-098.60 above for further information on the removal of high order unexploded ordnance clearance from the draft DCO (C1 F07).
REP5-098.64	**1.3.2 Comments on Mitigation and Monitoring Schedule [REP4-013]** 66. We welcome the updates and changes that have been made to the schedule. These updates suitably correct the previous omissions, as highlighted in our deadline 4 response, with respect to the relevant mitigation documents that apply to fish receptors (including the offshore Environmental Management Plan (EMP), the Marine Mammal Mitigation Protocol (MMMP), and the Underwater Sound Management Strategy (UWSMS)). NRW(A) are now content with this list for fish and consider this matter closed.	The Applicant notes NRW (A)'s response and agrees that this matter is closed.
REP5-098.65	**1.3.3 Comments on Responses to NRW D3 Submissions [REP4-047]** **1.3.3.1 REP3-090.83** 67. We welcome the amendments made to the relevant documents and confirming that the updated mitigation and monitoring schedule now includes the relevant items that apply to fish.	The Applicant notes NRW (A)'s response.
REP5-098.66	**1.3.3.2 REP3-090.88 - REP3-090.89** 68. NRW (A) acknowledge the Applicant's response and that cod is specifically included in the UWSMS. We have previously advised that the specific measures included within the strategy may well be appropriate to	The Applicant notes NRW (A)'s response.

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	mitigate against the noise impacts for spawning cod from the project alone, but that we will need to see the detail of the proposed measures in order to assess their effectiveness. We look forward to seeing additional detail on the strategy as it emerges post-consent and we will continue to provide comment and engagement on the strategy as it is formed.	
REP5-098.67	**1.3.3.3 REP3-090.90 - REP3-090.91** 69. NRW(A) attended a meeting with the Applicant on the 8 November 2024 in order to agree a way forward on a number of matters relating to fish, particularly seasonal timing restrictions to protect spawning fish species. A follow-up meeting also occurred on 26 November 2024. We understand that for the Deadline 5 submissions, the Applicant is going to provide some additional information on the UWSMS scope in relation to cod protection, to address the project's contribution to the cumulative impacts on spawning cod - which we welcome. Subject to reviewing the final detail of the additional information to be submitted at Deadline 5, we anticipate being able to agree with the proposed changes. For the avoidance of doubt, we do, however, reiterate our position on impacts to cod from the project alone, and consider that if the Applicant is introducing measures to protect cod from the development alone, then the assessment on the alone impacts should be updated to reflect that. This would be particularly important for future projects using the Mona information for their assessments. We welcome further engagement from the Applicant in due course and anticipate that the remaining fish issues can most likely be resolved via communication with the Applicant.	The Applicant notes the comments made by NRW (A) and welcomes further engagement on the development of the Underwater Sound Management Strategy (UWSMS). The Applicant would note that the Outline UWSMS has been updated at Deadline 5 (REP5-027) with additional clarification on how the final UWSMS would be used to manage the contribution of the Mona Offshore Wind Project to the cumulative effect of underwater sound on cod spawning. The updated Outline UWSMS (REP5-027) does not include further mitigation, which is intended to solely address impacts on cod from the Mona Offshore Wind Project alone but rather clarifies that the focus of the measures proposed (as set out in section 1.8 of the Outline UWSMS (REP5-027)) is to manage the contribution of the Mona Offshore Wind Project to cumulative underwater sound which, by nature, also reduces project alone impacts.
REP5-098.68	**1.3.3.4 REP3-090.97 & REP3-090.99** 70. We note and welcome the Applicant's confirmation that NRW (A) will be consulted in writing on the development of the UWSMS. Please see our comments at paragraph 72 above with respect to timing restrictions.	The Applicant notes NRW (A)'s response.
REP5-098.69	**1.3.4 Comments on the Errata sheet [REP4-088]** 71. We have no further comments to make on the errata sheet - any errors in relation to fish are minor and do not, in our view, change the outcome of assessments.	The Applicant notes and welcomes NRW (A)'s response.

2.4 Natural Resource Wales – Physical Processes

Table 2.4: REP5-098 – NRW Physical Processes

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-098.70	**1.4 Physical Processes** **1.4.1 Comments on Response to NRW Deadline 3 Submission [REP4-047]** **1.4.1.1 REP3-090.105** 72. NRW (A) welcomes the Applicant's expectation that a condition will be imposed within the standalone NRW marine licence securing the commitment to limit changes in water depth to 5% caused by the presence of cable protection along the export cable corridor up to and including the exit pits just seaward of MLWS. NRW (A) further welcome that where that restriction is anticipated to be exceeded, the Applicant will consult with NRW (A) in respect of agreeing an alternative position. This discussion will involve consideration of whether further physical processes assessment in the shallow nearshore area would be required, and if so on what terms that assessment would be undertaken. NRW (A) request that this commitment is secured in the stand-alone Marine Licence.	The Applicant welcomes Natural Resources Wales (Advisory) (NRW (A))'s response. The Applicant can confirm that the Marine Licence Principles Document (REP5-022) was updated at Deadline 5 to outline this commitment (see the 'Offshore Construction Method Statement' row) and that the Mitigation and Monitoring Schedule (MMS) (J10 F06) has also been updated at Deadline 6 (see row 8 of the MMS). The Applicant welcomes NRW (A)'s agreement as noted under item NRW.PP.1 within the Mona and Natural Resource Wales (Advisory) Offshore SoCG (S_D1_12 F02) submitted at Deadline 6. Subject to these amendments, NRW (A) agree that this matter is closed.
REP5-098.71	**1.4.1.2 REP3-090.107** 73. NRW (A) welcomes the Applicant's commitment to adopting trenchless techniques across the intertidal and welcomes the Applicant's commitment that account will also be given to the natural envelope of beach profile change over time from the analysis of historical beach profiles to inform the final detailed design of the drill duct profile to avoid the risk of cable exposure at the beach. This commitment is secured in the updated Landfall Construction Method Statement [REP4-017] section 1.10.3.2 submitted at Deadline 4.	The Applicant welcomes NRW (A)'s agreement and considers that this matter is now closed.
REP5-098.72	**1.4.1.3 REP3-090.111** 74. NRW (A) welcomes the commitment of the Applicant to conduct post-construction hydrographic and side scan surveys, with the intention to consider the data collected in the context of sand wave recovery, particularly in relation to the Constable Bank. NRW (A) welcomes that the Applicant has	The Applicant can confirm that monitoring of sandwave clearance recovery is included in Table 1.3 of the Offshore In-Principle Monitoring Plan submitted at Deadline 5 (REP5-027). The Applicant welcomes NRW (A)'s agreement and considers that this matter is now closed.

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	no objections to sharing this information with the relevant statutory bodies as part of the post-consent offshore monitoring plan. NRW (A) welcome the Applicant's acknowledgement that this will build on the strategic evidence required to understand the regional impacts to sediment transport processes and physical processes caused by the installation of large-scale wind farm developments into the future. The surveys already committed to by the Applicant will highlight any morphological changes to the seabed, improving the evidence base for future mitigation in accordance with National Policy and the best practice guidance and principles outlined in section 1.3 of the Offshore in-principle monitoring plan [APP-201].	
REP5-098.73	**1.4.2 Comments on the Outline Landfall Construction Method Statement [REP4-017]** 75. NRW (A) welcome the Applicant's commitment, as detailed in section 1.10.3.2, that account will also be given to the natural envelope of beach profile change over time from historical beach profiles to inform the final detailed design of the drill duct profile to avoid the risk of cable exposure at the beach. We consider this matter to be closed.	The Applicant welcomes NRW (A)'s agreement that this issue is closed.
REP5-098.74	**1.4.3 Comments on the Mitigation and Monitoring Schedule [REP4-013]** 76. **Reference Number 8:** NRW (A) request that the mitigation is amended to ensure that where the 5% restriction in water depth is exceeded, the Applicant will consult with NRW (A), in writing, in agreeing an alternative position. As noted by the Applicant in REP4-047 at REP3-090.103-105 *"…this discussion will involve consideration of whether further physical processes assessment in the shallow nearshore area would be required, and if so on what terms that assessment would be undertaken"*. NRW (A) request that this commitment is clearly worded and secured in the stand-alone Marine Licence and secured in the Mitigation and Monitoring Schedule [REP4-013] and Marine Licence Principle document [REP4-011] and this needs to be agreed in writing with NRW.	See Applicant's response to REP5-098.70 above.

2.5 Natural Resource Wales – Benthic Subtidal and Intertidal Ecology

Table 2.5: REP5-098 – NRW Benthic Subtidal and Intertidal Ecology

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-098.75	**1.5 Benthic Subtidal and Intertidal Ecology** 77.Following review of all documentation submitted at Deadline 4, NRW (A) have no further comments to provide with regard to Benthic Subtidal and Intertidal Ecology at this time.	The Applicant welcomes NRW (A)'s agreement and considers that this matter is now closed.

2.6 Natural Resource Wales – Marine Water & Sediment Quality

Table 2.6: REP5-098 – NRW Marine Water & Sediment Quality

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-098.76	**1.6 Marine Water and Sediment Quality (MW&SQ)** 78.Following review of all documentation submitted at Deadline 4, NRW (A) have no further comments to provide with regard to Marine Water and Sediment Quality.	The Applicant welcomes NRW (A)'s agreement and considers that this matter is now closed.

2.7 Natural Resource Wales – WFD Coastal and Transitional Water Bodies: Offshore Works

Table 2.7: REP5-098 – NRW WFD Coastal and Transitional Water Bodies: Offshore Works

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-098.77	**1.7 WFD: Coastal and Transitional Water Bodies – Offshore works** 79.Following review of all documentation submitted at Deadline 4, NRW (A) have no further comments to provide with regard to WFD.	The Applicant welcomes NRW (A)'s agreement and considers that this matter is now closed.

2.8 Natural Resource Wales – Designated Landscapes

Table 2.8: REP5-098 – NRW Designated Landscapes

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-098.78	**2 ONSHORE** **2.1 Designated Landscapes** **2.1.1 Landscape Sensitivity Assessment Guidance for Wales [REP4-085]** 80. The Applicant's submission refers to guidance[4] on how to prepare a landscape sensitivity assessment to inform spatial planning and land management change.	The Applicant notes that value is inherent but varies within the nationally designated landscapes, and refers to Hearing Summary (ISH3) Environmental Matters (REP4-032; point 76). Isle of Anglesey County Council (undated; Annex 3, Objective 1) states: *"LANDMAP is used as the process by which the landscape character of the AONB is valued and assessed"*. The Applicant has used LANDMAP Visual and Sensory evaluations to value and assess the varied landscape areas within the Isle of Anglesey (AONB) National Landscape. Landscape Institute (2024) does state that national landscapes should have the highest value, but also refers to the NRW guidance at section 5(4), which cites a number of documents to assist in establishing landscape sensitivity, including NRW (2023), which states that nationally designated landscapes can have high or very high value, as outlined in Landscape Sensitivity Assessment Guidance for Wales (REP4-085). The Applicant notes that Landscape Institute (2024; section 5(7)) conflicts with this, but the Applicant notes that the guidance does not consider internationally designated landscapes (unlike the guidance produced by NatureScot (Landscape Sensitivity Assessment Guidance, 2022, Figure 5), to which it refers in point 5(4)), which may have a higher value than nationally designated landscapes. The Applicant's methodology allows for this higher landscape designation, whilst also recognising that nationally designated landscapes can also be very high. Both the NRW guidance and the Applicant's own methodology recognise that nationally designated landscapes can have either very high or high value. The Applicant has followed the NRW (2023) guidance, considered the overall visual and sensory evaluations of the different Aspect Areas within the national landscape and found some areas to have a very high value and others to have a high value.
REP5-098.79	81. **Landscape sensitivity** is a judgement which combines separate judgements on the **value** of the landscape and the **susceptibility** of the landscape to the proposed change. Value is 'inherent' whilst susceptibility is specific to the development and the landscape in which it is located. The sensitivity of a highly valued landscape such as a National Park or Landscape may therefore be influenced by the susceptibility judgement. However, this does not mean the value of that landscape, which should reflect its national importance, is diminished in any way.	
REP5-098.80	82. The issue we raised at issue specific hearing (ISH) 3 concerned the Applicant's underestimation of **landscape value,** and the influence this has had on other conclusions within their seascape, landscape and visual impact assessment (SLVIA). For example, the Applicant considers that special qualities of the Isle of Anglesey National Landscape (IoA NL) are of diminished value, being only high rather than very high value5. The guidance referred to by the Applicant does not support the approach they have taken and ultimately this has affected other judgements relating to the sensitivity and overall effects on this nationally designated landscape.	
REP5-098.81	83. The latest Guidance prepared by the Landscape Institute titled *Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3)* (TGN 2024/01)6 published in August this year, provides a clear direction on this matter. It states '*Landscape value within nationally designated landscapes should be* ***at the highest level*** *(e.g.*	

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
	expressed as high/very high/ of national value)' (Our emphasis) (Page 12). For the avoidance of doubt, the reason the guidance refers to 'high/very high/national value', is not because there is a difference between these ratings for the purpose of the guidance, it is because the 'highest level' used to describe landscape value within a SLVIA may differ i.e. it may be 'high' in one assessment and 'very high' in another. In the case of the SLVIA for Mona, the highest level is 'very high' but, contrary to the aforementioned guidance, this judgement has not been used to describe e.g. special qualities of the IoA NL, which instead are assessed as high value.	The Applicant's assessment has not underestimated the value of the landscape within the nationally designated landscapes and has applied the NRW (2023) assessment criteria. The magnitude of change has not been underestimated. The Applicant has responded to this point in several of its previous responses (REP4-047, paragraph REP3-090.181).
REP5-098.82	84. Whilst the difference between high and very high may not appear to be significant, undervaluing the importance of the NL in this way, together with underestimating the magnitude of change, has resulted in an assessment which underestimates the significance of the harm to the NL. For the avoidance of doubt, the same approach was applied to undervaluing the special qualities of the Eryri National Park[7].	
REP5-098.83	**2.1.2 Appendix to HAP ISH3_20: Updated Visualisations Part 1 & Part 2 [REP4-038 & REP4-039]** 85. The Applicant has provided updated visualisations for SLVIA Viewpoints 1, 2, 3, 4, 26 and 55 based on updated photography. We welcome the provision of the new visualisations. As highlighted in our previous comments, the clarity of the previous images suffered from being taken in sub-optimal weather / visibility conditions[8]. The updated baseline photography addresses this issue at these viewpoints. The horizon is now clearly visible, as are the turbines. The new images should be viewed alongside our previous advice to the Examination regarding the impacts upon nationally designated landscapes in North Wales.	The Applicant notes NRW(A)'s response. The Applicant notes that the new visualisations do not alter the conclusions within Volume 2, Chapter 8: Seascape and visual resources (APP-060), as the assessment was undertaken assuming that the Mona Array Area would be visible, as set out in various of the Applicant's responses, (REP4-047; paragraphs REP3-090.167, REP3-090.168 and REP3-090.186). The limitation of wirelines is noted in the Applicant's Response to NRW D4 Submission (REP5-061; paragraphs REP-105.69 and REP4-105.78).
REP5-098.84	**2.1.3 Zone of Theoretical Visibility and representative viewpoint locations at 1:50,000 Scale [REP4-046]** **86.** We welcome the submission of the Zone of Theoretical Visibility (ZTV) analysis which has been re-presented at a larger scale (1: 50,000). As highlighted in our previous comments[9], the previous ZTV figures were illegible due to the small scale at which they were presented within the SLVIA document (1: 1,000,000)[10].	The Applicant notes NRW(A)'s response. The limitations of ZTVs are explained in the Applicant's Response to NRW D4 Submission (REP5-061; paragraph REP4-105.80). The Applicant notes that the ZTV overestimates the extent of the visibility of the Mona Array Area as it is based on bare-earth (topography only). The Applicant notes that the ZTV is a tool to identify areas where the Project might be visible, not how much or how visible it is.

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-098.85	**87.** The results of the ZTV are now legible. The updated ZTV supports our previous advice to the ExA that the turbines would be visible along the entire northern coastline of the Isle of Anglesey. Furthermore, that visibility would, subject to any localised screening by vegetation/buildings, be theoretically possible from the majority of the National Landscape along the northern part of the island. As anticipated, the impacts would not be limited only to the viewpoint locations presented within the SLVIA, but would be experienced at locations all along the coast, including the coast path, beaches, public rights of ways inland from the coast, roads, and settlements.	The Applicant used the ZTV, overlaid on detailed Ordnance Survey (OS) maps, to decide on representative viewpoints. The ZTV overlaid on these detailed OS maps was also used to inform the judgement of the significance of effects of the Mona Array Area on both on the landscape and the views and visual amenity. Consequently, the Applicant notes that the revised ZTV does not alter the conclusions within Volume 2, Chapter 8: Seascape and visual resources (APP-060). NRW(A) have requested within the Statement of Common Ground (SoCG) discussions for the Applicant to provide a cumulative ZTV of the Mona Array Area and the Awel y Môr Array Area at a larger scale. This is provided in S_D6_50.
REP5-098.86	**88.** We recommend the updated ZTV figures are viewed alongside our previous advice to the Examination regarding the impacts upon nationally designated landscapes in North Wales.	

2.9 Natural Resource Wales – WFD Compliance Assessment: Onshore Works

Table 2.9: REP5-098 – NRW WFD Compliance Assessment: Onshore Works

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-098.87	**2.2 WFD Compliance Assessment: Onshore Works** **2.2.1 Geomorphology Clarification Note (F01) [REP4-040]** 89. The submitted Geomorphology Clarification Note outlines the conditions of each crossing as previously requested and therefore we are satisfied in this regard.	The Applicant welcomes this response. The onshore SoCG with NRW has been updated to reflect this position (S_D1_13 F02).
REP5-098.88	90. We note the report does not specify the principles of design of the permanent or temporary haul road crossings e.g. whether these be culverts, box culverts, clear spans etc. We do, however, acknowledge that The Outline Onshore Construction Statement (REP4-020) has been updated to include the commitment that the design of the watercourse crossings at each location will follow the approach set out in the National Culverts Study (NRW, 2022). The Onshore Construction Statement forms part of the Code of Construction Practice which is secured in the DCO. As previously noted any permanent culverts proposed (if permitted via the flow chart in the National Culverts Study) should be oversized (hydraulically and at least x1.3 natural physical channel width), laid at the natural gradient of the watercourse, and buried within channel substrate to provide a continuous natural bed. Temporary culverts should also apply these points if due to be in the channel for >8 weeks or outside of the summer months.	The Applicant notes this response. The commitment to designing the watercourse crossings and haul road crossings in accordance with the National Culvert Study has been included in the Outline Construction Method Statement (REP4-019). The onshore SoCG with NRW has been updated to reflect this position (S_D1_13 F02).

2.10 Natural Resource Wales – Air Quality

Table 2.10: REP5-098 – NRW Air Quality

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-098.89	**2.3 Air Quality** 91. Following review of all documentation submitted at Deadline 4, NRW (A) have no further comments to provide with regard to Air Quality.	The Applicant welcomes this comment. This is reflected in section 1.4.6 of the Mona and NRW (A) Onshore Statement of Common Ground (S_D1_13 F02), where all matters on air quality are agreed.

2.11 Natural Resource Wales – Ecology (Terrestrial)

Table 2.11: REP5-098 – NRW Ecology (Terrestrial)

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-098.90	**2.4 Ecology (Terrestrial)** 92. Following review of all documentation submitted at Deadline 4, NRW (A) have no further comments to provide with regard to Ecology.	The Applicant welcomes this comment. This is reflected in section 1.4.5 of the Mona and NRW (A) Onshore Statement of Common Ground (S_D1_13 F02).

2.12 Natural Resource Wales – Water Quality

Table 2.12: REP5-098 – NRW Water Quality

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-098.91	**2.5 Water Quality (Surface and Groundwater)** 93. Following review of all documentation submitted at Deadline 4, NRW (A) have no further comments to provide with regard to Water Quality.	The Applicant welcomes this comment. This is reflected in section 1.4.3 of the Mona and NRW (A) Onshore Statement of Common Ground (S_D1_13 F02), where all matters on hydrology and flood risk are agreed.

2.13 Natural Resource Wales – Flood Risk

Table 2.13: REP5-098 – NRW Water Quality

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-098.92	**2.6 Flood Risk** 94. Following review of all documentation submitted at Deadline 4, NRW (A) have no further comments to provide with regard to Flood Risk.	The Applicant welcomes this comment. This is reflected in section 1.4.3 of the Mona and NRW (A) Onshore Statement of Common Ground (S_D1_13 F02), where all matters on hydrology and flood risk are agreed.

2.14 Natural Resource Wales – Materials & Waste

Table 2.14: REP5-098 – NRW Material & Waste

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-098.93	**2.7 Materials and Waste** 95.Following review of all documentation submitted at Deadline 4, NRW (A) have no further comments to provide with regard to Materials and Waste.	The Applicant welcomes this comment. This is reflected in section 1.4.7 of the Mona and NRW (A) Onshore Statement of Common Ground (S_D1_13 F02), where all matters on materials and waste are agreed.

3 Marine Licensing

Table 3.1: REP5-098 – NRW Marine Licensing

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-098.94	**3. Marine Licensing** 96. NRW MLT have reviewed the Applicant's Deadline 4 submission which included an updated Draft Development Consent Order (REP4-005). We welcome a number of amendments that have been made to address comments made in REP3-090 surrounding the drafting of the DCO and deemed Marine Licence. However, NRW MLT provide the following comments on matters we consider remain outstanding.	The Applicant welcomes this comment.
REP5-098.95	**3.1 Part 1 of DCO Interpretation** 97.NRW MLT as detailed in REP3-090 maintain that the correct reference should be Mean High Water Springs (MHWS) not Mean High Water (MHW). This is consistent with other recent Development Consent Orders including Awel y Mor, and Hornsea 4. This also accords with relevant primary and secondary legislation. See: section 42 of Marine and Coastal Access Act 2009 ['the MACAA 2009'].	The Applicant refers to its Response to October Hearing Action Points (REP5-055), row HAP_ISH5_03.
REP5-098.96	**3.2 Transfer Provision of the deemed Marine Licence (Article 7 of the DCO and also Schedule 14 paragraph 7)** 98.NRW MLT maintain our concerns set out in REP1-056 and REP4-108 surrounding the inclusion of provisions relating to the transfer of the deemed Marine Licence. In our view the established and correct approach would be for the transfer of the deemed Marine Licence to be considered under section 72 of the MACAA 2009 by the Licensing Authority.	The Applicant notes this comment and refers to its Response to NRW Deadline 3 Submission (REP4-047), table 3.1, row REP3- 090.231.
REP5-098.97	**3.3 Schedule 14 para 12, Para 18 (4) Para 19 (2), Para 20 (3) and Para 21 (3) – Time Limits for Approval of Plans** 99.NRW MLT maintain our concerns set out in REP1-056 and REP4-108 surrounding the inclusion of such provisions.	The Applicant notes this comment and refers to its Response to NRW Deadline 3 Submission (REP4-047), table 3.1, row REP3- 090.236.
REP5-098.98	**3.4 Schedule 14, para 17 (2) Dropped Objects**	The Applicant has updated the draft development consent order (C1 F07) at condition 17, Schedule 14, in response to this comment.

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
	100. NRW MLT maintain as set out in REP3-90 additional wording is required at the end of para 17(2) to provide that all dropped objects must be recovered unless otherwise approved by the licensing authority. As currently drafted it is unclear whether any further action would be required following notification and any survey requirements.	