MONA OFFSHORE WIND PROJECT

Planning Statement F02

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Errata

Document section	Description of errata
Paragraph 1.6.4.4	This paragraph incorrectly includes impacts to recreational resources as a potential significant adverse effect identified as a result of the Mona Offshore Wind Project. The following bullet point should be deleted in its entirety - “Recreational use, although the effects on the Wales Coast Path and NCR 5 will be temporary during the construction phase only.”

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Glossary

Term	Meaning
Climate change	A change in global or regional climate patterns, in particular a change apparent from the mid to late 20th century onwards and attributed largely to the increased levels of atmospheric carbon dioxide produced by the use of fossil fuels.
Climate emergency	A situation in which urgent action is required to reduce or halt climate change and avoid potentially irreversible environmental damage resulting from it.
Climate resilience	The capacity of social, economic and ecosystems to cope with a hazardous event or trend or disturbance.
International commitments	Commitments made publicly on the international level.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Emissions	An amount of a substance that is produced and sent out into the air that is harmful to the environment, especially carbon dioxide.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Mona Offshore Wind Project.
Fossil fuel	A hydrocarbon-containing material formed naturally in the earth's crust from the remains of dead plants and animals.
Geophysical surveys	Surveys of the seabed which collect data on seabed form and boulder mapping.
Geotechnical surveys	Surveys of the seabed which collect data on underlying seabed geology and rock layers.
Greenhouse Gas (GHG)	A gas that absorbs and emits radiant energy within the thermal infrared range, causing the greenhouse effect. Examples include carbon dioxide and methane.
Greenhouse effect	The trapping of the sun's warmth in a planet's lower atmosphere, due to the greater transparency of the atmosphere to visible radiation from the sun than to infrared radiation emitted from the planet's surface.
Hydrodynamics	Physical processes of water movement e.g., ocean currents.
Local impact report	A report in writing giving details of the likely impact of the proposed development on the authority's area.
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 'deemed marine licences' as part of the DCO process. In addition, licensable activities tthat are not wholly outside 12 nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).
Maximum design scenario	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.
Micrositing	The final selection of the position of infrastructure which may move in the order of a few metres to avoid an obstruction.
Mona Array Area	The area within which the offshore wind turbines (up to 96) will be located.

Term	Meaning
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.
Nationally Significant Infrastructure Project (NSIP)	Large scale development including power generating stations which requires development consent under the Planning Act 2008. An offshore wind farm project with a capacity of more than 350MW in Wales, constitutes an NSIP.
Net zero	A target of completely negating the amount of greenhouse gases produced by human activity either worldwide or by a country or organisation, to be achieved by reducing emissions and implementing methods of absorbing carbon dioxide from the atmosphere.
National Policy Statement	A document setting out national policy against which proposals for NSIPs will be assessed and decided upon. See also NPSs.
Pathway to 2030 Holistic Network Design	The Pathway to 2030 Holistic Network Design represents a suite of documents that together set out a coordinated approach for connecting 23GW of offshore wind.
Policy	A set of decisions by governments and other political actors to influence, change, or frame a problem or issue that has been recognized as in the political realm by policy makers and/or the wider public.
Project Design Envelope (PDE)	The PDE sets out the design assumptions and parameters from which the realistic MDSs are drawn for the Mona Offshore Wind Project EIA.
Protected species	A species of animal or plant which it is forbidden by law to harm or destroy.
Ramsar sites	Wetlands of international importance that have been designated under the criteria of the Ramsar Convention. In combination with SPAs and SACs, these sites contribute to the national site network.
Relevant Local Planning Authority	The Relevant Local Planning Authority is the local planning authority in respect of an area within which a project is situated, as set out in section 173 of the Planning Act 2008 (sometimes known as the district planning authority, albeit it may be a borough, district or unitary authority). Relevant Local Planning Authorities may have responsibility for discharging requirements and some functions pursuant to the Development Consent Order, once made.
Renewable energy	Energy from a source that is not depleted when used, such as wind or solar power.
Sites of Community Importance (SCIs)	Sites which, in the biogeographical region or regions to which they belong, contribute significantly to the maintenance or restoration at a favourable conservation status of a natural habitat type.
Special Areas of Conservation (SACs)	A site designation specified in the Conservation of Habitats and Species Regulations 2017. Each site is designated for one or more of the habitats and species listed in the Regulations. The legislation requires a management plan to be prepared and implemented for each SAC to ensure the favourable conservation status of the habitats or species for which it was designated. In combination with SPAs and Ramsar sites, these sites contribute to the national site network.
Special Protection Areas (SPAs)	A site designation specified in the Conservation of Habitats and Species Regulations 2017, classified for rare and vulnerable birds, and for regularly occurring migratory species. SPAs contribute to the national site network.
The Planning Inspectorate	The executive agency of the Department for Levelling Up, Housing and Communities responsible for operating the planning process for NSIPs.

Term	Meaning
The Secretary of State for Energy Security and Net Zero	The decision maker with regards to the application for development consent for the Mona Offshore Wind Project.
Unexploded Ordnance	Remains of explosive devices that did not detonate when they were deployed.
Water quality	The chemical, physical, and biological characteristics of water based on the standards of its usage.
Welsh inshore waters	Welsh waters within 12 nm of the Welsh coast.
Welsh offshore waters	Welsh waters seaward of 12 nm from the Welsh coast.

Acronyms

Acronym	Description
AEZ	Archaeological Exclusion Zone
CEA	Cumulative Effect Assessment
CCC	Committee on Climate Change
CNP	Critical National Priority
CoP	Conference of Parties
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EMF	Electromotive Force
EWG	Expert Working Group
FMfP	Flood Map for Planning
GHG	Greenhouse Gas
HND	Holistic Network Design
HDD	Horizontal Directional Drilling
HRA	Habitats Regulations Assessment
ICCI	In-Combination Climate Impact
IEF	Important Ecological Features
ISAA	Information to Support the Appropriate Assessment
LDP	Local Development Plan
LSE	Likely Significant Effects
MCAA	Marine and Coastal Access Act 2009
MCZ	Marine Conservation Zone
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation

Acronym	Description
MPA	Marine Protected Areas
MPS	Marine Policy Statement
NGESO	National Grid Electricity System Operator
NPS	National Policy Statement
NRP	Natural Resources Policy
NRW	Natural Resources Wales
NSIP	Nationally Significant Infrastructure Project
OSP	Offshore Substation Platform
PDE	Project Design Envelope
PPW	Planning Policy Wales
PTS	Permanent Threshold Shift
SAC	Special Areas of Conservation
SCI	Sites of Community Importance
SNCBs	Statutory Nature Conservation Bodies
SPA	Special Protection Areas
SPG	Supplementary Planning Guidance
SSSI	Sites of Special Scientific Interest
TANs	Technical Advice Notes
TTS	Temporary Threshold Shift
WFD	Water Framework Directive
WNMP	Welsh National Marine Plan

Units

Unit	Description
km^2	Square kilometres
km	Kilometres
nm	Nautical miles
GW	Gigawatts
MW	Megawatts
%	Percent
°C	Degrees Celsius
TWh	Terawatt Hour

Planning Statement

Executive Summary

This Planning Statement has been prepared on behalf of Mona Offshore Wind Limited (the Applicant) and accompanies a Development Consent Order (DCO) application under Section 37 of the Planning Act 2008 for the Mona Offshore Wind Project. The Mona Offshore Wind Project is an offshore wind farm within Welsh waters with a proposed electricity generating capacity of over 350 megawatts.

The Mona Offshore Wind Project comprises an offshore array area of up to 96 wind turbines in Welsh waters, with a connection via offshore export cables. Landfall will be made at Llanddulas, and the Mona Onshore Cable Corridor will head south, before turning east at Moelfre. The Onshore Substation will be sited to the south of the St Asaph Business Park in order to facilitate connection to the Bodelwyddan National Grid Substation via the Mona 400kV Grid Connection Cable Corridor.

The Mona Offshore Wind Project Environment Impact Assessment (EIA) process has employed a Maximum Design Scenario approach, also known as the Rochdale Envelope approach. This approach is consistent with the Planning Inspectorate's Advice Note Nine: Rochdale Envelope (Planning Inspectorate, 2018). This provides flexibility, while ensuring all potentially significant effects (positive or adverse) are assessed within the EIA process and reported in the Environmental Statement. The Mona Offshore Wind Project is in the early stages of the development process. Therefore, the project description is indicative and the 'envelope' has been designed to include flexibility to accommodate further project refinement during detailed design, post consent.

The installation of the Mona Offshore Wind Project would assist with realising the UK Government's ambition within its National Policy Statements of delivering up to 50 gigawatts of offshore wind by 2030 and contributing to the UK's energy security. It would also assist with meeting local renewable energy policy objectives within the Denbighshire County Council Local Development Plan 2013 and the Conwy County Borough Council Local Development Plan 2013.

The Mona Offshore wind Project would make a positive contribution to reducing carbon emissions and make a significant contribution to UK and Welsh Government renewable energy targets. The UK's ambition is to lead the world in combatting climate change, reducing reliance on fossil fuels and embracing a future where renewable energy powers homes and businesses. At the centre of this drive is a commitment to reducing UK greenhouse gas emissions and reaching net zero by 2050. The UK government has an ambition to generate 50 GW of clean, renewable energy from offshore wind by 2030. The Mona Offshore Wind Project has a critical role to play, both in helping the UK to achieve its net zero ambitions and, specifically, in reaching offshore wind generation goals. Further, the increase in the amount of renewable energy generated by the Mona Offshore Wind Project will contribute to increased overall energy security and network resilience, which is required to meet future energy demand.

The Mona Offshore Wind Project will contribute to the Welsh and UK economy by providing socio-economic benefits through employment opportunities and low-cost energy to consumers.

This Planning Statement outlines a detailed assessment of the Mona Offshore Wind Project against relevant National Policy Statements, Welsh Government and local planning authority policy considerations, and marine policy considerations. This assessment demonstrates that the Mona Offshore Wind Project accords with these policies.

The construction, operations and maintenance, and decommissioning of the Mona Offshore Wind Project would be carried out in accordance with the relevant National Policy Statements and other identified material planning policy matters. Where there are predicted impacts from the Mona Offshore Wind Project, appropriate and proportionate mitigation measures are proposed.

The need for the Mona Offshore Wind Project and offshore wind in general is also clearly supported by the National Policy Statements, in addition to wider governmental obligations and objectives relating to low carbon electricity generation, climate change and the economy.

In consideration of the above, the Secretary of State can conclude that the proposed Mona Offshore Wind Project:

- Accords with the requirements of section 104 of the Planning Act 2008
- Contributes to meeting renewable energy targets and providing energy security
- Assists in reducing carbon emissions
- Brings significant benefits that would outweigh any adverse impacts
- Complies with national and local planning and marine policy.

Datganiad Cynllunio

Crynodeb Gweithredol

Paratowyd y Datganiad Cynllunio hwn ar ran Mona Offshore Wind Limited (yr Ymgeisydd) ac mae'n cyd-fynd â chais Gorchymyn Cydsyniad Datblygu (DCO) o dan Adran 37 o Ddeddf Cynllunio 2008 ar gyfer Prosiect Gwynt Alltraeth Mona. Mae Prosiect Gwynt Alltraeth Mona yn fferm wynt alltraeth o fewn dyfroedd Cymru gyda chapasiti cynhyrchu trydan arfaethedig o dros 350 megawat (MW).

Mae Prosiect Gwynt Alltraeth Mona yn cynnwys ardal ar y môr lle ceir aráe o hyd at 96 o dyrbinau gwynt yn nyfroedd Cymru, gyda'r cysylltiad trwy geblau rhyng-aráe a cheblau allforio. Bydd yn dod i'r tir yn Llanddulas, a bydd Coridor Ceblau Prosiect Gwynt Alltraeth Mona yn mynd i'r de, cyn troi i'r dwyrain ym Moelfre. Bydd yr is-orsaf ar y tir yn cael ei lleoli i'r de o Barc Busnes Llanelwy er mwyn hwyluso cysylltiad ag Is-orsaf Grid Cenedlaethol Bodelwyddan trwy Goridor Ceblau Cysylltiad Grid Mona 400kV.

Mae proses Asesiad Effaith ar yr Amgylchedd Prosiect Gwynt Alltraeth Mona wedi defnyddio dull amlen Rochdale, hynny yw dull sy'n seiliedig ar ymagwedd 'sefyllfa waethaf' . Mae'r dull hwn yn gyson â Nodyn Cyngor Naw yr Arolygiaeth Gynllunio: Amlen Rochdale (Arolygiaeth Gynllunio, 2018). Mae hyn yn rhoi hyblygrwydd, gan sicrhau bod yr holl effeithiau sylweddol posibl (cadarnhaol neu negyddol) yn cael eu hasesu yn y broses AEA ac yn cael eu hadrodd yn y Datganiad Amgylcheddol. Mae Prosiect Gwynt Alltraeth Mona yng nghamau cynnar y broses ddatblygu. Felly, mae disgrifiad y prosiect yn un dangosol ac mae'r 'amlen' wedi'i chynllunio i gynnwys hyblygrwydd er mwyn gallu mireinio'r prosiect ymhellach yn ystod y gwaith dylunio manwl, ar ôl y cydsyniad.

Byddai Prosiect Gwynt Alltraeth Mona yn helpu i wireddu uchelgais Llywodraeth y DU o fewn ei Datganiadau Polisi Cenedlaethol o ddarparu hyd at 50 gigawat (GW) o wynt ar y môr erbyn 2030 a chyfrannu at ddiogelwch ynni'r DU. Byddai hefyd yn helpu i gyflawni amcanion polisi ynni adnewyddadwy lleol yng Nghynllun Datblygu Lleol Cyngor Sir Ddinbych 2013 a Chynllun Datblygu Lleol Cyngor Bwrdeistref Sirol Conwy 2013.

Byddai Prosiect Gwynt Alltraeth Mona yn gwneud cyfraniad cadarnhaol at leihau allyriadau carbon ac yn gwneud cyfraniad sylweddol at dargedau ynni adnewyddadwy Llywodraeth y DU a Llywodraeth Cymru. Uchelgais y DU yw arwain y byd wrth frwydro yn erbyn newid hinsawdd, lleihau'r ddibyniaeth ar danwydd ffosil a chroesawu dyfodol lle mae ynni adnewyddadwy yn pweru cartrefi a busnesau. Yn ganolog i'r ymgyrch hon mae ymrwymiad i leihau allyriadau nwyon tŷ gwydr y DU a chyrraedd sero net erbyn 2050. Mae gan Lywodraeth y DU uchelgais i gynhyrchu 50 GW o ynni glân ac adnewyddadwy o wynt ar y môr erbyn 2030. Mae gan Brosiect Gwynt Alltraeth Mona ran hanfodol i'w chwarae, wrth helpu'r DU i gyflawni ei huchelgeisiau sero net ac, yn benodol, wrth gyrraedd nodau cynhyrchu gwynt ar y môr. At hynny, bydd y cynnydd yn faint o ynni adnewyddadwy a gynhyrchir gan Brosiect Gwynt Alltraeth Mona yn cyfrannu at fwy o ddiogelwch ynni'n gyffredinol a gwytnwch y rhwydwaith, sy'n angenrheidiol i fodloni'r galw am ynni yn y dyfodol.

Bydd Prosiect Gwynt Alltraeth Mona Môr yn cyfrannu at economi Cymru a'r DU drwy ddarparu buddion economaidd-gymdeithasol trwy gyfleoedd cyflogaeth ac ynni cost isel i ddefnyddwyr.

Mae'r Datganiad Cynllunio hwn yn amlinellu asesiad manwl o Brosiect Gwynt Alltraeth Mona yn erbyn Datganiadau Polisi Cenedlaethol perthnasol, ystyriaethau polisi Llywodraeth Cymru ac awdurdodau cynllunio lleol, ac ystyriaethau polisi morol. Mae'r asesiad hwn yn dangos bod Prosiect Gwynt Alltraeth Mona yn cyd-fynd â'r polisïau hyn.

Byddai'r holl waith a wneir yn cynnwys y gwaith adeiladu a chynnal a chadw, a datgomisiynu Prosiect Gwynt Alltraeth Mona yn cael ei wneud yn unol â'r Datganiadau Polisi Cenedlaethol perthnasol a materion polisi cynllunio perthnasol eraill a nodwyd. Lle rhagwelir y bydd effeithiau yn sgil Prosiect Gwynt Alltraeth Mona, cynigir mesurau lliniaru priodol a chymesur.

Mae'r angen am Brosiect Gwynt Alltraeth Mona a gwynt alltraeth yn gyffredinol hefyd yn cael ei gefnogi'n glir gan y Datganiadau Polisi Cenedlaethol, yn ogystal â rhwymedigaethau ac amcanion ehangach y llywodraeth sy'n ymwneud â chynhyrchu trydan carbon isel, newid hinsawdd a'r economi.

Wrth ystyried yr uchod, gall yr Ysgrifennydd Gwladol ddod i'r casgliad y byddai Prosiect Gwynt Alltraeth Mona arfaethedig yn:

- Unol â gofynion Adran 104 o Ddeddf Cynllunio 2008
- Cyfrannu at gyrraedd targedau ynni adnewyddadwy a darparu diogelwch ynni
- Helpu i leihau allyriadau carbon
- Byddai mwy o fuddion sylweddol nag a fyddai o unrhyw effeithiau niweidiol
- Cydymffurfio â pholisi cynllunio cenedlaethol a lleol a pholisi morol.

1 Planning statement

1.1 Introduction

1.1.1 Purpose of the planning statement

1.1.1.1 This Planning statement has been prepared by RPS on behalf of Mona Offshore Wind Limited (the Applicant), a joint venture of bp Alternative Energy investments (hereafter referred to as bp) and Energie Baden-Württemberg AG (hereafter referred to as EnBW) who is developing the Mona Offshore Wind Project. The Planning statement is submitted as part of the Development Consent Order (DCO) application for the Mona Offshore Wind Project.

1.1.1.2 The Planning statement is one of a series of documents that accompanies the DCO application to the Secretary of State (the Application) submitted in accordance with Section 37 of the Planning Act 2008 and Regulations 5 and 6 of the Infrastructure Planning (Application: Prescribed Forms and Procedures) Regulations 2009 (the 'APFP Regulations'). The APFP Regulations do not require a planning statement to support applications for Development Consent; however, in order to assist the Secretary of State in determining the application, it is considered helpful to bring all the principal matters together into one statement in order to consider them in the context of relevant policy.

1.1.1.3 The Mona Offshore Wind Project has been subject to Environmental Impact Assessment (EIA), the outcomes of which have been reported in the Environmental Statement that also accompanies the DCO application. The Mona Offshore Wind Project is also subject to Habitats Regulations Assessment (HRA) in order to determine its potential effects on European Designated Sites and Species.

1.1.1.4 Aspects concerning the need for the Mona Offshore Wind Project (section 1.4), the site selection process (section 1.2.3) and alternative designs and technologies considered by the Applicant during the design-development process are explained fully in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4) and presented in summary form within this Planning statement. The legislative and policy context relating to renewable energy and the associated environmental assessments undertaken in relation to the Mona Offshore Wind Project is set out in Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document Reference F1.2). Other, more specific legislation and policy is set out as necessary in the various topic chapters of the Environmental Statement.

1.1.1.5 The outcomes of the EIA (in the form of the Environmental Statement) and the HRA (in the form of the Information to Support the Appropriate Assessment (ISAA)) have informed the content of this Planning statement, specifically in relation to assisting the determination of accordance of the Mona Offshore Wind Project with relevant National Policy Statements (NPSs), Welsh national policy and local planning policy.

1.1.1.6 The Planning statement is structured as follows:

- Section 1.1: Introduction
- Section 1.2: Application location and project description
  - This section summarises the project description that is set out in full in Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3), describing all of the onshore and offshore components

necessary to deliver the Mona Offshore Wind Project and connect it to the National Grid Transmission System

- Section 1.3: Relevant legislation and policy
  - This section sets out the legislative and policy context that is considered relevant to the determination of the Application
- Section 1.4: Need for the Mona Offshore Wind Project
  - This section sets out the need case for the Mona Offshore Wind Project in the context of national, European and international policy and legislation
- Section 1.5: Accordance with NPSs and other national and local policy
  - This section considers the relationship of the Mona Offshore Wind Project with the topic-specific planning policies set out in NPSs EN-1, EN-3 and EN-5, and relevant Welsh policy. Consideration of other planning policies including local planning policy, where relevant, is also described under the 'other policy considerations' heading for each topic and a summary of effects and policy compliance is provided for each topic
- Section 1.6: Balance of considerations and overall conclusions
  - This section provides an overview of the need for the Mona Offshore Wind Project, sets out the Mona Offshore Wind Project benefits and effects and weighs up the planning balance in an overall conclusion. It concludes that the Mona Offshore Wind Project, as a Critical National Priority infrastructure project, is urgently needed and the presumption in favour of consenting the Mona Offshore Wind Project, as set out in particular in NPS EN-1 paragraphs 3.3.63 and 4.1.7, is unaffected by its residual effects.

1.1.2 About the Applicant

1.1.2.1 As stated in section 1.1, the Applicant is a joint venture between two leading energy companies (bp and EnBW). These two companies are working together as partners to deliver offshore wind projects in both Offshore Wind Leasing Round 4 and ScotWind Leasing.

1.1.2.2 EnBW is one of the largest energy supply companies in Germany and supplies electricity, gas, water and energy solutions and energy industry services to around 5.5 million customers with a workforce of more than 27,000 employees. EnBW aims to strengthen its position as a sustainable and innovative infrastructure partner for customers, citizens and local authorities to an even greater extent. The repositioning of EnBW with a focus on renewable energies and smart infrastructure solutions is a key component of its strategy. With a focus on renewable energy and smart infrastructure solutions, EnBW's objective is for half of the electricity it supplies to be from renewable sources by the end of 2025. This is already having a noticeable effect on the reduction of CO_2 emissions, which EnBW aims to halve by 2030 and to be climate neutral by 2035. EnBW has been involved in the operation of hydro power plants in the Black Forest for more than 100 years and has a large and continuously growing number of onshore wind farms and solar photovoltaics in Germany, France and Sweden. In addition, EnBW developed, constructed and operates four offshore wind farms in Germany (EnBW Baltic 1, Baltic 2, Hohe See and Albatros) with a total installed capacity of 945 MW, commissioned between 2011 and 2020. A further 900 MW offshore wind farm, He Dreiht, is currently under development in Germany.

1.1.2.3 bp has set out an ambition to be a net-zero company by 2050 or sooner, and to help the world get to net zero. bp has set out a strategy for delivering this ambition. bp is focused on delivering its transformation into an integrated energy company, helping to provide the energy the world needs today, and investing in the energy transition.

1.1.2.4 bp entered the offshore wind sector in 2020 via a partnership with Equinor to develop offshore wind projects in the US, including the Empire Wind and Beacon Wind projects off the East Coast that have a planned potential of 4.4 GW generating capacity. In the UK, bp and partner EnBW are leading the development of the Morgan and Mona offshore wind projects in the Irish Sea and the Morven offshore wind project in the North Sea. These projects have a combined potential generating capacity of 5.9 GW, sufficient to power the equivalent of around 6 million UK households. In early 2023, bp was successful in its bid to develop its first floating offshore wind demonstration project offshore Aberdeenshire.

1.1.2.5 In July 2023, bp was successful in its bids for two sites offshore in Germany with a potential generating capacity of 4 GW. bp has formed a strategic partnership with Japanese conglomerate Marubeni to explore offshore wind opportunities in Japan. bp has also formed a JV with Norway's Deep Wind Offshore, a part of which saw bp acquire a 55% stake in the company's early-stage offshore wind portfolio, which includes four projects across the Korean peninsula with a potential generating capacity of up to 6 GW.

1.1.2.6 bp already has a significant onshore wind business in the US with a gross generating capacity of 1,700 MW, operating nine wind assets across the country. On 30 November 2023 it was announced that bp agreed to acquire the 50.03% interest it did not already own in Lightsource bp, which means that bp will take full ownership of Lightsource bp following completion of the transaction. Lightsource bp aims to develop 10 GW of solar projects by 2023.

1.2 Application location and project description

1.2.1 Project location

1.2.1.1 The Mona Array Area is 300 km^2 in area and is located 28.8 km (15.6 nm) from the north coast of Wales, 46.5 km (25.3 nm) from the northwest coast of England and 46.6 km (25.2 nm) from the Isle of Man (when measured from Mean High Water Springs (MHWS)). The Mona Array Area is located in Welsh offshore waters (beyond 12 nm from the Welsh coast).

1.2.1.2 The offshore export cables and related works located within and between the Mona Array Area and the landfall will be routed through the Mona Offshore Cable Corridor, which overlaps with both Welsh offshore and Welsh inshore waters. Landfall will be made at Llanddulas, and the Mona Onshore Cable Corridor will head south, before turning east at Moelfre. The Onshore Substation will be sited to the south of the St Asaph Business Park in order to facilitate connection to the Bodelwyddan National Grid Substation via the Mona 400kV Grid Connection Cable Corridor.

1.2.2 Project description

1.2.2.1 The Planning statement provides a high-level summary of the Mona Offshore Wind Project components. The full project description including a detailed explanation of all onshore and offshore project components, and matters relevant to the construction, operation and maintenance, and decommissioning of the Mona Offshore Wind Project

is provided in Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3). The Mona Offshore Wind Project consists of the following key components:

- Up to 96 offshore wind turbines
- Foundations (for wind turbines and Offshore Substation Platforms (OSPs)
- Inter-array cables linking the individual wind turbines to each other and the OSPs
- Scour protection for foundations and cables, where required
- High Voltage Alternating Current (HVAC) transmission system components including:
  - OSPs
  - Offshore interconnector cable(s)
  - Offshore export cables
  - Transition Joint Bays (TJBs) (connecting the offshore and onshore cables)
  - Onshore export cables
  - Onshore Substation
  - Connection into existing Bodelwyddan National Grid Substation.

1.2.2.2 The key components of the Mona Offshore Wind Project will be provided in the following development areas:

- Mona Array Area: This is where the wind turbines, OSPs, foundations (for both wind turbines and OSPs), inter-array cables, interconnector cables and 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
- Intertidal Access Areas: The area from MHWS to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities
- Landfall and TJB Area: This is where the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling
- 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 infrastructure will be located
- Mona Onshore Substation: This is where the new substation will be located, containing the components for transforming the power supplied from the offshore wind farm up to 400 kV
- Mona 400 kV Grid Connection Cable Corridor: The corridor from the Mona onshore substation to the National Grid substation.

1.2.2.3 The proposed capacity of the Mona Offshore Wind Project is over 350 MW therefore it is above the Planning Act 2008 thresholds for Welsh offshore schemes. The final capacity of the Mona Offshore Wind Project will be determined based on available

technology and constrained by the design envelope of the wind turbines presented in Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3).

1.2.2.4 In addition to the offshore wind turbines, the offshore infrastructure will also include up to 360 km of offshore export cables, 50 km of interconnector cables and 325 km of inter-array cables.

1.2.2.5 The final number of wind turbines will be dependent on the capacity of individual wind turbines used and also environmental and preconstruction site investigation (geophysical and geotechnical) survey results. A range of wind turbine models will be considered, however, they will all follow the traditional offshore wind turbine design with three blades and a horizontal rotor axis.

1.2.2.6 The offshore export cables will connect to the onshore export cables at the TJBs and will transfer the electricity to the Onshore Substation. The onshore export cables will be buried for their entire length and once installed, the cables will occupy a permanent easement of approximately 30 m wide,

1.2.2.7 The Mona Onshore Cable Corridor will route south from the landfall and pass to the west of Abergele. It will be approximately 15 km in length with the cables buried underground at a target depth of 1.8 m. This target burial depth may be increased where the route is required to cross beneath existing features such as pipelines, land drains, highways or rivers.

1.2.2.8 A further section of buried onshore export cabling is required to connect the Onshore Substation with the existing National Grid substation at Bodelwyddan. This is referred to as the 'Mona 400 kV Grid Connection Cable'. This section of cabling will be approximately 1 km in length.

1.2.2.9 The Mona Onshore Cable Corridor, the Onshore Substation and 400kV Grid Connection Cable will be located within the Mona Onshore Development Area, together with temporary construction compounds and accesses to the public highway network.

1.2.2.10 Construction of the Mona Offshore Wind Project is anticipated to commence in 2026, and it is intended to be fully operational by 2030 in order to provide an important contribution to the UK Government's renewable energy targets.

1.2.3 Site selection

1.2.3.1 The site selection process, including alternatives considered and any refinements to the Mona Offshore Wind Project that have taken place as a result of the EIA process, in response to consultation and stakeholder feedback, technical studies, landowner engagement and engineering feasibility work is presented in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4).

1.2.4 Project design evolution

1.2.4.1 The Project Design Envelope (PDE) approach (also known as the Rochdale Envelope approach) has been adopted for the EIA, in accordance with current industry good practice. This approach allows for a project to be assessed on the basis of a Maximum Design Scenario (MDS) (i.e. the worst-case scenario) in order to provide flexibility, while ensuring all potentially significant effects are assessed within the EIA process and reported in the Environmental Statement. The PDE approach allows for some

flexibility in project design options, where the full details of a project are not known at DCO application submission stage.

1.2.4.2 This approach has been taken for the EIA in relation to both the offshore and onshore elements because it is not possible to provide precise final design details of the Mona Offshore Wind Project a number of years ahead of the time it will be constructed. Offshore wind is a constantly evolving industry with a constant focus on cost reduction, therefore improvements in technology and construction methodologies occur frequently and an unnecessarily prescriptive approach could preclude the adoption of new technology and methods.

1.2.4.3 The use of the PDE approach has been recognised in the Overarching NPS for Energy (NPS EN-1) and the NPS for Renewable Energy Infrastructure (NPS EN-3), which are considered in section 1.3 below. The PDE approach is also consistent with the Planning Inspectorate's Advice Note Nine: Rochdale Envelope (The Planning Inspectorate, 2018).

1.2.4.4 There have been refinements to the Mona Offshore Wind Project throughout the process to date as part of the Applicant's iterative approach to design, which includes taking on board feedback from statutory and non-statutory consultation.

1.2.4.5 For example, initial mapping and consideration of onshore and offshore constraints was undertaken to develop defined search areas within which future infrastructure would be sited for each project component. The search area within the Mona agreement for lease area (AfL) formed the basis of the Mona Array Scoping Boundary used within the Mona Offshore Wind Project EIA Scoping Report (Mona Offshore Wind Ltd. 2022). Early in the Mona Offshore Wind Project development the Applicant identified the need to remove the northernmost part of the Mona AfL area to mitigate potential impacts on shipping and navigation. This was presented in the PEIR as the Mona Potential Array Area. Feedback received through non-statutory and statutory consultation also highlighted a general concern over the impact of the Mona Offshore Wind Project alone and cumulatively on shipping and navigation receptors. These concerns, alongside other feedback on the PEIR and further engineering, environmental and technical work, informed the Applicant's decision to reduce the Mona Array Area from what was presented in the PEIR. The spatial extent of the Mona Array Area was reduced from approximately 450 km^2 to 300 km^2 with refinements in the north, east and south.

1.3 Relevant legislation and policy

1.3.1 Introduction

1.3.1.1 This section outlines the legislative and policy framework that is relevant to the Mona Offshore Wind Project and, in particular, that which should be considered by the Secretary of State when determining this application for development consent under the Planning Act 2008.

1.3.2 International obligations on climate change

1.3.2.1 The United Nations Convention on Climate Change supreme decision-making body is termed the Conference of Parties (CoP) which reviews the implementation of the Convention and any other legal instruments that the CoP adopts and takes decisions necessary to promote the effective implementation of the Convention, including institutional and administrative arrangements. In 2021, the CoP was held in Glasgow.

The Conference negotiated a global agreement (the United Nations Framework Convention on Climate Change (2021)) with the key goal of limiting increases of global temperatures to "*well below 2°C compared to pre-industrial levels*". The parties also agreed to "*pursue effects to limit the temperature increase to 1.5°C*". This was a development of the earlier (the United Nations Framework Convention on Climate Change (2015) The Paris Agreement) for a binding and universal agreement on climate from all the parties. The agreement was reached by 196 parties, seeking to prevent a "*climate catastrophe*" by keeping temperature rises within 1.5°C.

1.3.2.2 The Summary of Global Climate Action at COP 28, which was held in Dubai in November 2023 provided by the United Nations Framework Convention on Climate Change (UNFCCC) confirms that the Global Renewables and Energy Efficiency Pledge has been launched. The Pledge stipulates *"that signatories commit to work together to triple the world's installed renewable energy generation capacity to at least 11,000 GW by 2030 and to collectively double the global average annual rate of energy efficiency improvements from around two per cent to over four percent every year until 2030"*. The UK has endorsed the Pledge.

1.3.3 National obligations on climate change

United Kingdom

1.3.3.1 The Climate Change Act 2008 (the Climate Act) is the basis for the UK's approach to tackling and responding to climate change. It requires that emissions of carbon dioxide and other greenhouse gases (GHG) are reduced and that climate change risks are adapted to.

1.3.3.2 Through the Climate Act, the UK government has set a target to significantly reduce UK GHG emissions by 2050 and a path to get there. The Act also established the Committee on Climate Change (CCC) to ensure that emissions targets are evidence-based and independently assessed. In addition, the Climate Act requires the Government to assess the risks and opportunities from climate change for the UK, and to adapt to them.

1.3.3.3 The Climate Act commits the UK government by law to reducing GHG emissions by at least 100% of 1990 levels (net zero) by 2050. This includes reducing emissions from the devolved administrations (Scotland, Wales and Northern Ireland), which currently account for about 20% of the UK's emissions. The 100% target was based on advice from the CCC's 2019 report, 'Net Zero – The UK's contribution to stopping global warming'.

1.3.3.4 Further ambitions are set out in the UK Government's Energy White Paper, 'Powering our Net Zero Future' 2021, the Net Zero Strategy: Build Back Greener (2021) and the British Energy Security Strategy (2022) to have 40GW offshore wind by 2030, a fourfold increase on today's installed capacity. This aligns with the Prime Minister's Ten Point Plan for a Green Industrial Revolution (2020).

Wales

1.3.3.5 Following on from the Prosperity for All: A Low Carbon Wales (Welsh Government, 2019a), the Net Zero Wales Plan (Welsh Government, 2021a) (the Net Zero Plan) covers the second carbon budget (2021 to 2025). The suite of regulations passed by the Senedd in March 2021 increased the Welsh decadal emissions targets from their 2018 level and set Carbon Budgets 2 and 3 in line with them. The targets and budgets set in law are:

- Carbon Budget 2 (2021 to 2025): 37% average reduction with a 0% offset limit
- Carbon Budget 3 (2026 to 2030): 58% average reduction
- 2030: 63% reduction
- 2040: 89% reduction
- 2050: 100% reduction (net zero).

1.3.3.6 The Net Zero Plan focuses on the need to outperform the second carbon budget (of 37% average reduction in emissions) to build the foundations necessary to meet the significant step change (of 58% average reduction) required by the third carbon budget (2026 to 2030).

1.3.3.7 The Net Zero Plan contains 123 policies and proposals across all ministerial portfolios, including:

- Policy 24 – Marine evidence, planning and licencing: supporting offshore and marine renewable energy deployment
- Policy 27 – Maximising Welsh benefit from commercially operated infrastructure projects in Wales (stating that in the offshore wind and floating offshore wind sectors the government will work with the owners of major infrastructure to develop local supply chains).

1.3.4 Planning legislation

The Planning Act 2008

1.3.4.1 The Planning Act is the primary legislation that establishes the legal framework for the preparation, examination and determination of applications for DCOs for Nationally Significant Infrastructure Projects (NSIPs). It sets out the consenting system for all NSIPs, including those in the energy sector.

1.3.4.2 Amendments have been made to the planning system that are applicable to the Planning Act. Under the Localism Act 2011, the Planning Inspectorate became the executive agency responsible for the NSIP consenting process. Any developer wishing to construct a project that is classified as an NSIP must apply for a DCO. The Planning Inspectorate will examine the application submissions and make a recommendation to the Secretary of State, in the case of energy projects, for the Department for Energy Security and Net Zero (DESNZ) to grant or refuse consent.

1.3.4.3 The Planning Act sets out that for offshore generating station and transmission developments in waters in or adjacent to Wales, the NSIP threshold is a generating capacity of over 350 MW. The Wales Act 2017 then amended section 149A of the Planning Act to allow a DCO to include a deemed marine licence where the responsibility for licensing lies with Natural Resources Wales (NRW), where the activities are wholly within Welsh offshore waters.

1.3.4.4 The proposed capacity of the Mona Offshore Wind Project is over 350 MW. As such it qualifies as an NSIP, under Section 31 of the Planning Act 2008 and accordingly a DCO application has been submitted by the Applicant, supported by an Environmental Statement, in respect of the Mona Offshore Wind Project.

1.3.4.5 Section 104 of the Planning Act 2008 makes it clear that in determining a DCO application the Secretary of State must take into account any relevant NPS, any appropriate Marine Policy Statement (MPS), any local impact report, any matters

prescribed in relation to the development and any matters the Secretary of State considers important and relevant.

1.3.4.6 This planning statement sets out how the Mona Offshore Wind Project accords with the relevant NPS policies, as well as other relevant policy and legislative requirements.

Marine and Coastal Access Act 2009

1.3.4.7 The Marine and Coastal Access Act (MCAA) 2009 introduced a new marine planning system for overseeing the marine environment and a requirement to obtain a marine licence for certain activities and works at sea.

1.3.4.8 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. The Wales Act 2017 amended section 149A of the Planning Act 2008 to allow a DCO to include a deemed marine licence where activities are wholly within Welsh offshore waters. NRW is the responsible authority for deemed marine licences in Welsh offshore waters and is a statutory consultee in the DCO process. NRW remains the monitoring and enforcement body in respect of the conditions and restrictions contained within a deemed marine licence. Licensable marine activities within Welsh inshore waters require a separate marine licence from NRW.

1.3.4.9 A marine licence is required before carrying out any licensable marine activities under the Marine and Coastal Access Act 2009. The marine licence for activities located in Welsh offshore waters will be deemed under the DCO. The deemed ML (dML) will cover works related to the offshore wind farm generation infrastructure (wind turbines, OSPs, inter-array cables and interconnector cables). A separate, standalone marine licence will be required for activities that are not wholly outside 12 nautical miles (nm) of the Welsh coast. The standalone marine licence will cover works associated to the offshore export cables, interconnector cables, OSPs, Mona Offshore Cable Corridor and Access Areas. The OSPs and interconnector cables are included in both marine licences as it has not yet been determined whether they would be generation or transmission infrastructure.

1.3.4.10 The Environmental Statement and supporting documents have been prepared in support of both the DCO application and the application for a marine licence from NRW.

Well-being of Future Generations (Wales) Act 2015

1.3.4.11 The Well-being of Future Generations (Wales) Act (the Wellbeing Act) aims to improve the social, economic, environmental and cultural well-being of Wales.

1.3.4.12 The Wellbeing Act gives a legally-binding common purpose – the seven well-being goals – for national government, local government, local health boards and other specified public bodies. It details the ways in which specified public bodies must work to improve the well-being of Wales.

1.3.4.13 The seven well-being goals are:

- A prosperous Wales
- A resilient Wales
- A more equal Wales
- A healthier Wales

- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh language
- A globally responsible Wales.

The Environment (Wales) Act 2016

1.3.4.14 The Environment (Wales) Act 2016 (the Environment Act) puts in place the legislation needed to manage Wales' natural resources in a more proactive, sustainable and joined-up way. The Environment Act focuses on climate change with the aim to reduce emissions by 100% by 2050 and sets a clear path for decarbonisation.

1.3.4.15 The Environment Act is supported by the Natural Resources Policy (NRP) which focuses on the sustainable management of Wales' natural resources to maximise their contribution to achieving goals within the Well-being of Future Generations (Wales) Act. The NRP sets out three National Priorities namely:

- Delivering nature-based solutions
- Increasing renewable energy and resource efficiency
- Taking a place-based approach. Planning Policy and Guidance.

UK Energy Policy

National Policy Statements

1.3.4.16 NPSs describe the national case and establish the need for certain types of infrastructure development including energy, as well as identifying key issues that should be considered by the Examining Authority and the Secretary of State as the decision-maker when examining an application for development consent.

1.3.4.17 The key test is to assess, on balance, whether the application is in accordance with the relevant NPSs and whether any specified exceptions apply. This may include considering whether the policies set out in the NPSs for delivery of renewable energy are outweighed by any adverse impacts that have been identified, noting the presumption is in favour of applications which accord with any relevant NPSs.

1.3.4.18 The relevant paragraphs of the relevant NPSs have been taken into account in preparing the application. The National Policy Statement (NPS) Tracker (Document Reference J2.1) is an appendix to this Planning Statement and provides a detailed analysis of how the Mona Offshore Wind Project accords with the relevant NPSs.

Overarching National Policy Statement for Energy (EN-1)

1.3.4.19 This is the overarching energy NPS, setting out the broad basis for considering applications for development consent. It sets out the Government's policy for the delivery of major energy infrastructure.

1.3.4.20 Paragraph 3.3.3 stresses the importance of ensuring that there is sufficient electricity to meet demand, new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand. Paragraph 3.2.8 confirms that when determining applications for national infrastructure, the Secretary of State is "*not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS*."

1.3.4.21 Whilst there is a general presumption in favour of consenting Nationally Significant Infrastructure Projects (NSIPs) based on the Government's assessment of the need for electricity generating capacity as set out in paragraphs 3.3.57 – 3.3.63 of the NPS, the NPSs designated in January 2024 now include a strengthened presumption specifically in favour of critical national priority (CNP) infrastructure.

1.3.4.22 Paragraphs 3.3.62 and 4.2.4 of NPS EN-1 confirms that the Government "… has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure."

1.3.4.23 Section 4.2 of the NPS states which energy generating technologies are low carbon and are therefore CNP infrastructure. Paragraph 4.2.5 of NPS EN-1 confirms what constitutes CNP infrastructure and states that for electricity generation it includes "… *all onshore and offshore generation that does not involve fossil fuel combustion*…."

1.3.4.24 Therefore, as an offshore wind generation project that does not involve fossil fuel combustion, the Mona Offshore Wind Project is considered by NPS EN-1 to be low carbon CNP infrastructure.

1.3.4.25 The strengthened presumptions in favour of CNP infrastructure include that even "where non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure" (paragraph 4.2.16). The paragraph then goes on to confirm " …in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts."

1.3.4.26 Paragraph 4.6.16 then confirms that the starting point for decision making is that CNP infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. This includes development within Green Belts, development affecting Sites of Special Scientific Interest (SSSIs), development in nationally designated landscapes and where there is substantial harm to or loss of significance to heritage assets (paragraph 4.2.17). See also Figure 2 of NPS EN-1.

1.3.4.27 Similarly, in terms of any HRA or MCZ residual impacts, paragraphs 4.2.18 – 4.2.22 (see also Figure 3) confirm that the starting point is that energy security and decarbonising the power section to combat climate change are capable of amounting to imperative reasons of overriding public interest (IROPI) with the benefit to the public being capable of outweighing the risk of environmental damage. These paragraphs also confirm that the fact there are other potential projects deliverable in different locations to meet the need for CNP infrastructure is unlikely to be treated as an alternative solution. If there are no alternative solutions the compensation measures must be secured.

1.3.4.28 NPS EN-1 imposes no limit on the number of CNP infrastructure projects that can be consented (Paragraph 4.2.21).

1.3.4.29 In terms of the requirements for applicants for CNP infrastructure, paragraphs 4.2.10 – 4.2.12 confirm that they must continue to show how their application meets the requirements of the NPSs applying the mitigation hierarchy, as well as any other legal and regulatory requirements, that they should also seek the advice of the appropriate SNCB or other relevant statutory body and demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated, setting out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success.

1.3.4.30 The exceptions to this presumption of consent are set out in NPS EN-1 paragraph 4.1.7. Whilst this paragraph reiterates that the need case will outweigh the residual

effects in all but the most exceptional cases, it also states that those exceptions include residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero and to unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.

1.3.4.31 None of the above exceptions apply to the Mona Offshore Wind Project.

1.3.4.32 In conclusion, therefore, NPS EN-1 confirms that "Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible." (paragraph 3.3.63).

1.3.4.33 There is therefore a strong presumption in favour of consenting the Mona Offshore Wind Project in accordance with NPS EN-1.

National Policy Statement for Renewable Energy Infrastructure (EN-3)

1.3.4.34 NPS EN-3 is the NPS for renewable energy infrastructure and sets out assessment principles in relation to for the consideration of renewable projects.

1.3.4.35 Section 3 of NPS EN-3 contains the matters that need to be considered by applicants and the Secretary of State in the general assessment of energy infrastructure, as well as technology specific information. Of relevance to the Mona Offshore Wind Project are:

- The relationship with English and Welsh renewables policies
- The factors influencing site selection and design
- Climate change adaptation
- Consideration of good design for energy infrastructure
- Flexibility in the project details
- Offshore Wind.

1.3.4.36 NPS EN-3 outlines that offshore wind development, and the supporting onshore and offshore transmission infrastructure and related network reinforcements, are viewed by the Government as being a critical national priority (CNP) and should be progressed as quickly as possible.

1.3.4.37 Paragraph 2.1.4 states that "applicants for CNP infrastructure must continue to show how their application meets the requirements in NPS EN-1 and NPS EN-3, applying the mitigation hierarchy, as well as any other legal and regulatory requirements".

1.3.4.38 Paragraph 2.8.37 states that "Co-ordinated transmission proposals are principally developed through, and as a consequence of, a process of ongoing reform through the Offshore Transmission Network Review (OTNR) with the lead party or parties for the initial co-ordination proposals varying according to the different temporal workstreams. Further details are provided in EN-5, section 2.12-2.15".

1.3.4.39 The impacts arising from the development of energy infrastructure are identified in Part 5 of NPS EN-1, and paragraphs 3.8.107 to 3.8.228 of NPS EN-3 and are not intended to be exhaustive.

1.3.4.40 When considering the impacts of energy infrastructure, paragraph 2.11.46 states that "Applicants must always employ the mitigation hierarchy, in particular to avoid as far as is possible the need to find compensatory measures for coastal, inshore and offshore developments affecting designated sites".

1.3.4.41 Mitigation referred to in paragraph 2.8.214 states that "At the earliest possible stage, alternative ways of working and use of technology should be employed to avoid environmental impacts. For example, construction vessels may be rerouted to avoid disturbing seabirds. Where impacts cannot be avoided, measures to reduce and mitigate impacts should be employed, for example using trenching techniques or noise abatement technology".

1.3.4.42 Further, paragraph 2.8.216 states that "Only once all feasible alternatives and mitigation measures have been employed, should Applicants explore possible compensatory measures to make good any remaining significant adverse effects to site integrity".

National Policy Statement for Electricity Networks Infrastructure (EN-5)

1.3.4.43 NPS EN-5 is the NPS which provides detail of electricity networks (including grid connections for wind farms) and sets out assessment principles in relation to the consideration of applications relating to electricity networks and, in terms of offshore wind, this relates to substations, convertor stations and other kinds of electricity infrastructure such as underground and sub-sea cables.

1.3.4.44 Section 2 of the NPS contains the matters that need to be considered by Applicants and the Secretary of State in the general assessment of energy infrastructure, as well as technology specific information. These include:

- The factors influencing site selection and design
- Climate change adaptation
- Consideration of good design for energy infrastructure
- Environmental and biodiversity net gain
- Land rights and land interests
- Holistic planning
- Strategic network planning.

1.3.4.45 Section 2.12 of the NPS EN-5 relates entirely to the special assessment principles for offshore-onshore transmission. Paragraph 2.12.4 states that *"it is important that the network planning for offshore transmission is much more closely co-ordinated with the planning of connections to reinforcements of the onshore transmission network than previously. In addition, a more co-ordinated approach to designing transmission offshore is expected to be adopted compared with the previous standard approach of radial routes to shore. This applies to spatially close groups of offshore windfarms, interconnectors, multi-purpose interconnectors and bootstraps"*.

1.3.4.46 In preparing applications for offshore-onshore transmission, section 2.13 of the NPS EN-5 outlines that there should be consideration of strategic network design, and a coordinated approach to design should be adopted. Radial offshore transmission options to single windfarms should only be proposed where options assessment work identifies that a co-ordinated solution is not feasible.

1.3.4.47 It is noted that in response to growing concern that the developer led approach, where offshore wind projects connected individually to the grid on a radial (point-to-point) basis, would present a major barrier to realising the UK Government's ambition of building 50GW in offshore wind capacity by 2030, the Offshore Transmission Network Review (OTNR) was launched in 2020.

1.3.4.48 The OTNR focussed on the approach taken across the UK electricity sector to delivering connections for offshore wind projects and sets out a set of recommendations for a future framework to deliver the next generation of the UK's world leading offshore wind power. One of the core outputs of the OTNR is the delivery of a holistic approach to network planning.

1.3.4.49 The Mona Offshore Wind Project was scoped into the Pathway to 2030 Holistic Network Design (HND) Project. The recommended design for the Northwest Region is a combination of collaborative developer-led solutions and single radial connections. A number of potential grid connection locations and options were considered by National Grid Electricity System Operator (NGESO) through the HND process based on an understanding of the grid infrastructure capacity in relation to the location of the Mona Offshore Wind Project (and considering other Round 4 offshore wind projects coming forward in the Irish Sea). NGESO concluded that the preferred connection option representing the most optimal design (economic, efficient and co-ordinated) considering all criteria (i.e., technical, cost, environmental and deliverability) for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan Substation in Denbighshire, North Wales.

1.3.4.50 In this regard NPS EN-5 paragraph 2.2.1 highlights that the Secretary of State should bear in mind that the initiating and terminating points of new electricity networks infrastructure are not substantially within the control of the applicant and paragraph 2.2.2 recognises that siting is determined by both the location of new generating stations or other infrastructure requiring connection to the network and system capacity and resilience requirements determined by NGESO.

1.3.4.51 NPS EN-5 paragraph 2.13.5 goes on to confirm that the HND and subsequent network design exercises, may on occasion, identify a radial solution, not proposed to coordinate with another project at the time of network design, as is the case with the Mona Offshore Wind Project.

Future Wales – The National Plan 2040

1.3.4.52 Published in February 2021, Future Wales – the National Plan 2040 ('Future Wales') is the Welsh national development framework, setting the direction for development in Wales up to 2040. It forms part of the development plan and seeks to address key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being within Welsh communities.

1.3.4.53 Section 1 of Future Wales notes that Wales faces a climate emergency which is actively changing the Welsh environment and directly affecting communities.

1.3.4.54 In the context of the climate emergency, Future Wales notes that Wales can become a world leader in renewable energy technologies. Welsh wind and tidal resources, support for both large and community scaled projects, and commitment to ensuring the planning system provides a strong lead for renewable energy development, is recognised in Future Wales and confirms that Wales is well-placed to support the renewable sector, attract new investment and reduce carbon emissions.

1.3.4.55 Future Wales contains four policies of specific relevance to the Mona Offshore Wind Project.

1.3.4.56 **Policy 9 - Resilient Ecological Networks and Green Infrastructure -** To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:

- identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development
- identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and wellbeing.

1.3.4.57 **Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure** – expresses strong support for the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs. The policy states that in determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and the Welsh target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency.

1.3.4.58 In respect of large-scale wind, Policy 17 states that *"all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment"*. It also expects proposals should describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities. New strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities.

1.3.4.59 **Policy 18 - Renewable and Low Carbon Energy Developments of National Significance** states Proposals for renewable and low carbon energy projects (including repowering) qualifying as Developments of National Significance will be permitted subject to Policy 17 and other criteria detailed, also.

1.3.4.60 **Policy 24 – North West Wales and Energy** – advises that new energy-related development in the region should support local and regional communities; provide jobs and investment in training and skills; and work with universities and businesses across the region and the North West of England to co-ordinate and maximise new investment to support the wider region.

1.3.4.61 With regards to offshore projects, Future Wales notes in Policy 24 that onshore developments associated with offshore renewable energy projects will be supported in principle.

1.3.4.62 In parallel with these renewable energy policies, Future Wales commits to ambitious renewable energy targets:

- For 70% of electricity consumption to be generated from renewable energy by 2030
- For 1 GW of renewable energy capacity to be locally owned by 2030
- For new renewable energy projects to have at least an element of local ownership from 2020.

Planning Policy Wales 11 (including October 2023 update)

1.3.4.63 It is noted that Planning Policy Wales (PPW) 12, which incorporates the October 2023 update in addition to some more minor amendments, was formally issued on 7th February 2024. The Applicant can confirm that a note will be submitted to the

Examining Authority at the outset of the Examination to address any changes as a result of PPW12 relevant to the Mona Offshore Wind Project.

1.3.4.64 Published in February 2021, PPW 11 sets out the land use planning policies of the Welsh Government and is supplemented by 24 topic-based Technical Advice Notes (TANs). PPW and the TANs are material considerations in determining planning applications in Wales and likewise can be material considerations in the determination of applications for development consent.

1.3.4.65 Paragraph 1.17 of PPW11 refers to the Socio-economic Duty in the context of the need to reduce the inequalities of outcome that result from socio-economic disadvantage through the planning system.

1.3.4.66 PPW Chapter 2 (paragraph 2.8) highlights that "all planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales". It is noted that, as required by the Well-being of Future Generations Act, proposals should seek to maximise the social, economic, environmental, and cultural benefits, while considering the potential impacts.

1.3.4.67 PPW11 highlights in paragraph 12 of the introduction that the planning system provides for a presumption in favour of sustainable development and seeks to ensure that social, economic and environmental issues are balanced and integrated.

1.3.4.68 At Paragraph 2.15, which relates to national sustainable placemaking outcomes, PPW11 stresses that the national sustainable placemaking outcomes should be used to inform the preparation of development plans and the assessment of development proposals. The outcomes provide a framework which contains those factors which are considered to be the optimal outcome of development plans and individual developments. These outcomes, whilst highlighting the sustainable features of the place development plans and decisions help create, should be the starting point for plan makers and decision takers and be considered at the earliest possible opportunity.

1.3.4.69 PPW11 outlines the objectives for the planning system which reflect Welsh Government's view for sustainable development and the outcomes they seek to deliver across Wales. Paragraph 2.27 of PPW11 notes that in assessing the sustainable benefits of development, planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision-making process. Key planning principles in achieving this include reference to the planning system having a "*vital role to play in making development resilient to climate change. Decarbonising society and developing a circular economy for the benefit of both the built and natural environments, and to contribute to the achievement of the well-being goals".*

1.3.4.70 Furthermore, paragraph 2.28 of PPW11 outlines the key factors in the process of considering the assessment process are noted as including consideration of:

- Are the environmental impacts of development on health and amenity limited to acceptable levels of and the resilience of ecosystems improved
- How the proposal would support the achievement of a more prosperous, low carbon, innovative and resource efficient Wales
- Will the causes and impacts of climate change be fully taken into account through location, design, build, operation, decommissioning and restoration
- Does it support decarbonisation and the transition to a low carbon economy?

1.3.4.71 Paragraph 3.24 states that where significant effects on human health are likely to arise as a result of development plans or individual development proposals, environmental impacts should be considered in full knowledge of the likely consequences for health. Information to assess potential impacts on health can be required through various mechanisms, such as sustainability appraisal of development plans and environmental impact assessments, and where relevant, health impacts should be incorporated into such assessments. In general, the most effective and collaborative ways of working will require shared and integrated approaches to evidence gathering and assessments. Health Impact Assessment makes a valuable contribution towards plan making. It may be useful when proposing or making decisions on new development along with evidence collected by Public Service Boards. Evidence on health impacts can help the planning system develop stronger and more coherent approaches towards maximising health and well-being.

1.3.4.72 Paragraph 3.58 and 3.59: Agricultural land of grades 1, 2 and 3a of the Agricultural Land Classification system (ALC) is the best and most versatile and should be conserved as a finite resource for the future. When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade.

1.3.4.73 Paragraph 3.8 outlines how good design can help to ensure high environmental quality. Landscape and green infrastructure considerations are an integral part of the design process. A Design and Access Statement is discussed in paragraph 3.17 as a tool to demonstrate the design process that has been undertaken and explains how the objectives of good design and placemaking have been considered from the outset of the development process.

1.3.4.74 Specifically, with regards renewable energy and offshore wind, section 5 of PPW11 notes that low carbon electricity must become the main source of energy in Wales. Paragraph 5.7.7 notes that *"The benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate change emergency and increase energy security, is of paramount importance."* In addition, the planning system should (*inter alia)*:

- Optimise the location of new developments to allow for efficient use of resources
- Maximise renewable and low carbon energy generation
- And seek to achieve the Welsh Government target of to generate 70% of its electricity consumption from renewable energy by 2030.

1.3.4.75 In terms of delivery, paragraph 5.7.7 further states that the planning system should (*inter alia*):

- Integrate development with the provision of additional electricity grid network infrastructure
- Optimise energy storage
- Optimise the location of new developments to allow for efficient use of resources

- Maximise renewable and low carbon energy generation.

1.3.4.76 Paragraph 5.7.8 states an effective electricity grid network is required to fulfil the Welsh Government's renewable and low carbon ambitions. It advocates an integrated approach towards planning for energy developments and additional electricity grid network infrastructure. In certain circumstances, additional electricity grid network infrastructure will be needed to support the 'Pre-Assessed Areas for Wind Energy' in Future Wales, but also new energy generating developments more generally.

1.3.4.77 In its guidance for determining applications for renewable and low carbon energy technologies PPW11 (paragraph 5.9.19) notes that planning authorities should consider:

- The contribution a proposal will make to meeting identified Welsh, UK and European targets
- The contribution to cutting GHG emissions
- The wider environmental, social and economic benefits and opportunities from renewable and low carbon energy development.

1.3.4.78 Paragraph 5.9.20 further states that Planning authorities should also identify and require suitable ways to avoid, mitigate or compensate adverse impacts of renewable and low carbon energy development. The construction, operation, decommissioning, remediation and aftercare of proposals should take into account:

- The need to minimise impacts on local communities, such as from noise and air pollution, to safeguard quality of life for existing and future generations
- The impact on the natural and historic environment
- Cumulative impact
- The capacity of, and effects on, the transportation network.

1.3.4.79 Paragraph 6.4.3 states that development plan strategies, policies and development proposals must consider the need to safeguard protected and priority species and existing biodiversity assets from impacts which directly affect their nature conservation interests and compromise the resilience of ecological networks and the components which underpin them, such as water and soil, including peat.

1.3.4.80 Paragraph 6.2.5 states that "the quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, informed by an appropriate level of assessment, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, help to overcome the potential for conflicting objectives, and contribute to health and wellbeing outcomes".

1.3.4.81 The October 2023 update to Paragraph 6.2.5 now states that "a green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multifunctional outcomes which are appropriate to the site in question and must be used for demonstrating how the stepwise approach (Paragraph 6.4.21) has been applied".

1.3.4.82 The October 2023 update to Paragraph 6.4.21 now states that “having worked iteratively, in line with Figure 1X, through the stages of the stepwise approach below, and providing evidence in the Green Infrastructure Statement that the stepwise approach has been followed, a scheme of enhancements must be provided to ensure a net benefit for biodiversity”.

1.3.4.83 In addition to the paragraphs referred to above, the following paragraphs of PPW11 are relevant to the topic specific assessments within section 1.5 of this Planning Statement.

1.3.4.84 PPW11 seeks to ensure the implementation of measures to increase walking, cycling and public transport, reduce dependency on the car for daily travel; make best use of the available capacity, supported by targeted new infrastructure; and the application of strategies and policies to reduce travel demand, specifically that of single-occupancy private vehicles (paragraph 4.1.1). Further, land use and transport planning must be integrated i.e. within and between different types of transport; between transport measures and land use measures; between transport measures and policies to protect the environment; and between transport measures and policies for education, health, social, inclusion and wealth creation (paragraph 4.1.4).

1.3.4.85 Section 6 of PPW11 focuses on the adaptation to the effects of climate change, recognising that the combination of warming that has already occurred and additional warming, as projected by the latest climate change evidence, means there are potentially significant impacts for Wales in terms of adaptation. The challenges include flooding and coastal change risks to communities, businesses and infrastructure; risks to health, wellbeing and productivity from high temperatures; risk of water shortages in the public water supply, agriculture, energy generation and industry and risks to soil, biodiversity and terrestrial, coastal, marine and freshwater habitats.

1.3.4.86 With regard to the historic environment, PPW11 states that any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way (paragraph 6.1.7). PPW11 does not set out any specific policies for the testing of NSIPs, however Chapter 6 relates to the historic environment and is broadly consistent with the policies of NPS EN-1.

1.3.4.87 With regards to landscape (in particular, National Parks and Areas of Outstanding Natural Beauty) paragraphs 6.3.5 – 6.3.11 of PPW11 highlight that designated landscapes should be drivers of the sustainable use and management of natural resources in their areas. Further, PPW11 highlights the planning system’s role in helping to reverse the decline in biodiversity and increasing the resilience of ecosystems and stresses the need for biodiversity and resilience considerations to be taken into account at an early stage (paragraphs 6.4.3 - 6.4.5).

1.3.4.88 PPW11 highlights LANDMAP as an important information resource, methodology, and monitoring baseline for the landscapes of Wales, which can help inform planning for the sustainable management of natural resources in an area (paragraph 6.3.20). LANDMAP describes and evaluates the physical, ecological, visual, cultural and historic aspects of the landscapes of Wales, and provides the basis of a consistent, quality assured national approach to landscape assessment.

1.3.4.89 Statutorily designated sites (including Sites of Special Scientific Interest (SSSIs), SACs, SPAs, Ramsar sites, and formally proposed but not yet designated sites are required by PPW11 paragraphs 6.4.16 - 6.4.19 to be protected from damage and deterioration, with their important features conserved and enhanced by appropriate management.

1.3.4.90 Paragraph 6.4.21 confirms that planning authorities must follow a stepwise approach to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly avoided, then minimised, mitigated, and as a last resort compensated for, with enhancement secured wherever possible.

1.3.4.91 Paragraph 6.4.22 states the presence of a species protected under European or UK legislation, or under Section 7 of the Environment (Wales) Act 2016 is a material consideration when a planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat and to ensure that the range and population of the species is sustained. Appropriate ecological surveys are required to confirm whether a protected species is present and an assessment of the likely impact of the development.

1.3.4.92 With regard to the coast, paragraph 6.5.10 indicates that before permanent and long-term developments, including those of regional or national importance, can be granted permission it will be essential to demonstrate that a coastal location is required based on the characteristics of the coastline in question. Where development is considered to be justified it should be designed so as to be resilient to the effects of climate change over its lifetime and not result in unacceptable incremental increases in risk.

1.3.4.93 Flood risk is required to be considered at an early stage in formulating development proposals (paragraph 6.6.22) so that any development reduces flood risk, prevents the cumulative effects of incremental development (paragraph 6.6.25) and do not cause additional run-off (paragraph 6.6.27).

1.3.4.94 Paragraph 6.7.18 requires early consideration in order to ascertain whether the location and design of proposed development is acceptable where air pollution or noise generating development is likely to affect a protected species, or is proposed in an area likely to affect a statutorily designated site (such as Natura 2000 sites or SSSIs) or a tranquil urban green space valued for the restorative respite and contact with nature that they offer to residents of busy towns and cities.

1.3.4.95 Paragraph 6.7.21 states that regard should be paid to current air quality and noise levels and the quality of the existing soundscape and account taken of any relevant local air quality action plan, noise action plan and/or local or regional air quality strategy when determining planning applications.

Technical Advice Notes (TANs)

1.3.4.96 As stated above, TANs provide the guidance associated with Welsh Government's policies on various planning issues and support PPW11. TANs have been published to provide overarching national guidance for specific environmental topics.

TAN 11: Noise (1997)

1.3.4.97 TAN 11 notes that noise characteristics and levels can vary substantially according to their source and the type of activity involved. In the case of industrial development, for example, the character of the noise should be taken into account as well as its level.

1.3.4.98 TAN 11 advises that local planning authorities must ensure that noise generating development does not cause an unacceptable degree of disturbance and would not be incompatible with existing activities, taking into account the likely level of noise exposure at the time of the application and any increase that may reasonably be expected in the foreseeable future.

TAN 12: Design (2016)

1.3.4.99 TAN 12 states that achieving good design is the responsibility of all those involved in the design process. The planning system should be pro-active in raising the standard of design and in raising awareness of design issues among the general public and the private sector.

TAN 15: Development and Flood Risk (2004)

1.3.4.100 TAN 15 provides technical guidance which supplements the policy set out in PPW in relation to development and flooding. It advises on development and flood risk as this relates to sustainability principles and provides a framework within which risks arising from both river and coastal flooding, and from additional run-off from development in any location, can be assessed.

1.3.4.101 Appendix 1 of TAN 15 provides guidance for developers on the technical requirements for undertaking a Flood Consequences Assessment.

1.3.4.102 The current TAN15 was published in July 2004, and utilises NRW Development Advice Map (DAM).

1.3.4.103 In a letter dated 23 November 2021, the Welsh Government confirmed that the planning system is at the forefront of responding to the climate emergency and ensuring the well-being of current and future generations and that to ensure the planning system plays a full part in adaptation to climate change a new version of TAN 15 was made available on 28 September 2021, in advance of it coming into effect on 1 December 2021. The new TAN 15 was to be accompanied by the Flood Map for Planning (FMfP), which builds on the Flood Risk Assessment Wales map and includes allowances for climate change and was to replace the 2004 version of TAN 15 and DAM (which does not include climate change allowances), as well as Technical Advice Note 14: Coastal Planning.

1.3.4.104 On 2 March 2023 the Welsh Government confirmed that the coming into force of the new TAN 15 and the FMfP had been suspended due to a further consultation on the TAN.

1.3.4.105 Although the new TAN15 has not been formally published, the Welsh Government has indicated that, as the FMfP contains the most up to date information on flooding, it should be used to consider flood risk in relation to planning applications in Wales.

TAN 24: Historic Environment (2017)

1.3.4.106 TAN 24 provides technical guidance which supplements the policy set out in PPW in relation to the historic environment. It advises on world heritage sites, scheduled monuments, archaeological remains, listed buildings, conservation areas, historic parks and gardens, historic landscapes and historic assets of special local interest.

1.3.5 Marine Policy

1.3.5.1 Section 59 of the Marine and Coastal Access Act 2009 (MCAA) sets out that both the UK-wide MPS (September 2011) and the Welsh National Marine Plan (WNMP) (November 2019) are the appropriate marine policy documents for the purposes of Section 104 of the 2008 Act. The MPS provides the policy framework for the preparation of marine plans, and the basis for decisions affecting marine areas. The MCAA requires that all public authorities taking decisions regarding the marine area should do so in accordance with the MPS, unless relevant considerations indicate otherwise.

1.3.5.2 The Mona Offshore Wind Project is located entirely within the Welsh National Marine Plan (WNMP) area as shown in Figure 1 of the WNMP.

Welsh National Marine Plan

1.3.5.3 Published in November 2019, the WNMP includes, amongst its key objectives, Objective 3 which notes the WNMP should "Support the opportunity to sustainably develop marine renewable energy resources with the right development in the right place, helping to achieve the UK's energy security and carbon reduction objectives, whilst fully considering other's interests, and ecosystem resilience."

1.3.5.4 It is recognised that the WNMP, in providing policies to guide the consideration of offshore wind, also aims to "contribute significantly to the decarbonisation of our economy and to our prosperity by increasing the amount of marine renewable energy generated, through…supporting further commercial deployment of offshore wind technologies at scale over the lifetime of this plan".

1.3.5.5 The Welsh National Marine Plan Signposting Document (Document Reference J2.2) supports the applications for marine licenses, however, as it considers policy relevant to the Mona Offshore Wind Project it is appended to this Planning Statement. The document provides a detailed analysis of how the Mona Offshore Wind Project accords with the WNMP.

1.3.6 Local Planning Policy and Guidance

Local Development Plans

Denbighshire County Council Local Development Plan (2006 to 2021)

1.3.6.1 The Denbighshire Local Development Plan (LDP) (2006 to 2021) was adopted in June 2013. The following policies are considered to be of relevance to the Mona Offshore Wind Project:

1.3.6.2 **Policy RD1 Sustainable Development and Good Standard Design** sets out criteria in which development proposals will be supported if met.

1.3.6.3 **Policy RD5 The Welsh Language and the Social and Cultural Fabric of Communities** advises that in determining all applications, the needs and interests of the Welsh language will be taken into account. The policy outlines that for large scale infrastructure projects with long term community impacts, a Community and Linguistic Impact Assessment should be submitted with any planning application.

1.3.6.4 **Policy BSC3 Securing Infrastructure Contributions from Development** states that where relevant, development will be expected to contribute to the provision of infrastructure to meet the additional social, economic, physical and/or environmental infrastructure requirements arising from the development.

1.3.6.5 **Policy VOE1 Key Areas of importance** states the following areas will be protected from development that would adversely affect them. Development proposals should maintain and, wherever possible, enhance these areas for their characteristics, local distinctiveness, and value to local communities in Denbighshire:

- Statutory designated sites for nature conservation
- Local areas designated or identified because of their natural landscape or biodiversity value
- Sites of built heritage
- Historic Landscape, Parks and Gardens.

1.3.6.6 **Policy VOE2 Area of Outstanding Natural Beauty (AONB) and Area of Outstanding Beauty** states that consideration will be given to both the impact of development within the AONB (now termed and referred to below as a National Landscape (NL)) and Area of Beauty and the impact of development on their setting. Important views to and from the NL and AOB will be protected. Applicants should ensure that proposals are compatible with the aims and objectives of the AONB Management Plan.

1.3.6.7 **Policy VOE5 Conservation of Natural Resources** outlines that development proposals that may have an impact on protected species or designated sites of nature conservation will be required to be supported by a biodiversity statement which must have regard to the County biodiversity aspiration for conservation, enhancement and restoration of habitats and species.

1.3.6.8 Where the overall benefits of a development outweigh the conservation interest of a locally protected nature site, mitigation and enhancement measures in or adjacent to these sites should be an integral part of the scheme.

1.3.6.9 **Policy VOE 10 Renewable Energy Technologies** states that development proposals which promote the provision of renewable energy technologies may be supported providing they are located so as to minimise visual, noise and amenity impacts and demonstrate no unacceptable impact upon the interests of nature conservation, wildlife, natural and cultural heritage, landscape, public health and residential amenity. In areas that are visually sensitive, including the NLs, Conservation Areas, World Heritage Site and Buffer Zone and in close proximity to historic buildings, visually intrusive technologies will not be permitted unless it can be demonstrated that there is no negative impact on the designation or there is an overriding public need for the development.

1.3.6.10 **Policy PSE 1 – North Wales Coast Strategic Regeneration Area** states that in the North Wales Coast Strategic Regeneration Area the Council will support proposals which [inter alia]: enable the retention, enhancement and development of tourism related facilities.

1.3.6.11 **Policy PSE 13 – Coastal Tourism Protection Zones** ensures that within the coastal tourism protection zones shown on the proposals maps, proposals which would result in the loss of tourism facilities will not be supported.

1.3.6.12 **Policy PSE 15 Safeguarding Minerals** states that high quality resources of minerals, including limestone, sand and gravel, Denbigh Gritstones, igneous and volcanic deposits will be safeguarded from development that would result in its permanent loss or hinder future extraction. Development will only be permitted where:

i) it can be demonstrated that the need for the development outweighs the need to protect the mineral resource; or

ii) where such development would not have a significant impact on the viability of that mineral being worked; or

iii) where the mineral is extracted prior to the development.

1.3.6.13 **Policy BSC 11 Recreation and Open Space** state that existing recreation, public open space, allotments and amenity greenspace will be protected and where possible enhanced. Development that would result in the loss of public or private land with recreational and/or amenity value will only be permitted where alternative outdoor provision of equivalent or greater community benefit is provided.

1.3.6.14 **Policy STR/3 Mitigating Travel Impact** states that new developments will be required to mitigate the undesirable effects of travel such as; noise, pollution, impact on amenity and health and other environmental impacts. Where a proposed development is likely to have significant transport, social or environmental implications, the Council will require developers to submit a Transport Assessment and a Travel Plan with the planning application. A Road Safety Audit may also be required. Where the proposed development is considered to have significant transport implications on a wider area, financial contributions will be required towards improvements in transport infrastructure, in particular to support public transport, cycling and walking, in accordance with the development principles in Section 4 – Spatial Policies and Supporting Development Management Policies. The Council may also require developers to submit a Transport Statement for other development proposals where there is need to understand the traffic impact of the proposal.

Emerging Local Development Plan

1.3.6.15 Whilst Denbighshire County Council is preparing a new LDP to run from 2018 to 2033, with a draft Preferred Strategy being published in May 2019, the originally anticipated date for its adoption, of Autumn 2021, was delayed due to the coronavirus pandemic. The current anticipated adoption date is now September 2025 and the emerging LDP has only got to Preferred Strategy stage. Accordingly, the emerging LDP has not been considered in this planning statement.

Conwy County Borough Council Local Development Plan (2007 to 2022)

1.3.6.16 The Conwy LDP (2006 to 2021) was adopted in October 2013. The following policies are considered to be of relevance to the Mona Offshore Wind Project.

1.3.6.17 **Paragraph 4.8.2.1 Sustainable Transport Statement** New development is required to address the transport implications of that development. Larger schemes may be required to prepare transport assessments to illustrate how the amount of trips generated will be accommodated and how accessibility to and from the site by all modes of transport will be achieved. For non-residential proposals which are likely to have significant transport implications, the Government also requires the submission of travel plans, the purpose of which is to promote more sustainable forms of transport in relation to the activities of a particular development (for example; encouraging reductions in car usage and increased use of public transport, walking and cycling).

1.3.6.18 **Policy DP/1 Sustainable Development Principles** sets out criteria in which all developments are required to adhere to.

1.3.6.19 **Policy DP/3 Promoting Design Quality and Reducing Crime** advises that all new development will be of high quality, sustainable design which provides usable, safe, durable and adaptable places, and protects local character and distinctiveness of the Plan Area's built historic and natural environment.

1.3.6.20 **Policy DP/4 – Development Criteria:** Planning permission will not be granted where the proposed development would have an unacceptable adverse impact on the best and most versatile agricultural land.

1.3.6.21 **Policy DP/6 National Planning Policy and Guidance** outlines that development proposals must comply with national planning policy and guidance.

1.3.6.22 **Policy NTE/1 The Natural Environment** sets out how the council will seek to regulate development so as to conserve and where possible enhance the natural environment, countryside and coastline.

1.3.6.23 **Policy NTE/3 Biodiversity** advises that new development should aim to conserve and enhance biodiversity through criteria. The policy also advises that all proposals should include a biodiversity statement detailing the extent of impact on biodiversity.

1.3.6.24 **Policy NTE/4 The Landscape and Protecting Special Landscape Areas** states that development proposals will have to show particular regard to the character of each locality in order to minimise their impact. Development will only be permitted if it is shown to be capable of being satisfactorily integrated into the landscape.

1.3.6.25 **Policy NTE/5 The Coastal Zone** outlines that development in the coastal zone, outside settlement boundaries, will only be permitted where the development:

- Specifically requires a coastal location
- Does not adversely affect the open character of the zone
- Does not adversely affect the nature conservation value of the zone with any effects identified mitigated for
- Does not detract from the tourism value or facilities
- Does not interfere with natural coastal processes
- Does not impede the function of any existing coastal defence structures
- Accords with the Development Principles of the Plan.

1.3.6.26 **Policy NTE/6 Energy Efficiency and Renewable Technologies in New Development** advises that the efficient use and conservation of natural resources are essential to the overall quality of life within the Plan Area and to support wider social and economic sustainability objectives. The Council will:

"Promote renewable energy sources within development proposals which support energy generation from biomass, marine, waste, solar and wind sources, including micro generation where this is acceptable, in terms of impact on quality of life, amenity, landscape, viability and biodiversity in line with Policy DP/6."

1.3.6.27 **Policy NTE/8 Sustainable Drainage Systems** advises the use of Sustainable Drainage Systems will be required wherever reasonably practicable with preference for on-site disposal and where satisfactory arrangements can be put in place for the long-term maintenance of those systems. Where this is not proposed a developer will need to justify that discharge is necessary and is adequately controlled.

1.3.6.28 **Policy CTH/1 Cultural Heritage** advises that the Council is committed to protecting, and where appropriate, enhancing its cultural and heritage assets by:

- Recognising and respecting the value and character of heritage assets in the Plan Area and publishing Supplementary Planning Guidance to guide development proposals
- Seeking to preserve and, where appropriate, enhance conservation areas, Conwy World Heritage Site, historic landscapes, parks and gardens, listed buildings, scheduled ancient monuments and other areas of archaeological importance in line with Policy DP/6
- Protecting buildings and structures of local importance in line with Policy CTH/3 – 'Buildings and Structures of Local Importance'
- Enhancing heritage assets through heritage and regeneration initiatives

- Preserving and securing the future of heritage assets by only permitting appropriate enabling development in line with Policy CTH/4 – 'Enabling Development'
- Ensuring that development is compatible with the long-term viability of the Welsh Language in line with Policy CTH/5 – 'The Welsh Language' Emerging Local Development Plan.

1.3.6.29 **Policy CTH/2 Development Affecting Heritage Assets** ensures that development proposals which affect a heritage asset and/or its setting, shall preserve or, where appropriate, enhance that asset. The following heritage assets are considered:

a) Conservation Areas
b) Conwy World Heritage Site
c) Historic Landscapes, Parks and Gardens
d) Listed Buildings
e) Scheduled Ancient Monuments
f) Sites of archaeological importance.

1.3.6.30 **Policy CTH/5 The Welsh Language** outlines that the Council will ensure that development supports and sustains the long-term well-being of the Welsh language, and will resist development which, because of its size, scale or location, will significantly harm the character and linguistic balance of a community.

1.3.6.31 **Policy MWS/1 Minerals and Waste** outlines how The Council will ensure that there is sufficient provision of mineral resources and waste management facilities, while safeguarding the natural and built environment.

1.3.6.32 **Policy CFS/12 – Safeguarding existing open space:** Existing recreation, public open space, allotments and amenity green space will be protected and where possible enhanced.

Emerging Local Development Plan

1.3.6.33 Conwy Council is preparing a new LDP to run from 2018 to 2033. The Preferred Strategy Consultation occurred between the 29 July 2019 and the 12 September 2019. Adoption of the new LDP was expected in September 2021, however due to the coronavirus pandemic, this has been delayed with no clear indication of a revised delivery agreement.

1.3.6.34 As with the emerging Denbighshire LDP, as the emerging Conwy LDP has only got to Preferred Strategy stage, it has not been considered in this planning statement.

Supplementary Planning Guidance

Denbighshire County Council

Planning and the Welsh Language (March 2014)

1.3.6.35 This SPG sets out when a Community and Linguistic Assessment is required in support of a planning application and how it should be set out and includes the specific questions which need to be answered in the assessment as well as providing information on the baseline for Welsh Language in Denbighshire.

Conwy County Council

The Welsh Language (Adopted November 2014)

1.3.6.36 This SPG sets out how a Community and Linguistic Assessment should be set out, the questions which need to be answered and the current baseline in Conwy.

1.4 Need for the Mona Offshore Wind Project

1.4.1 Overview

1.4.1.1 The NPSs establish the policy need for new renewable energy generation. The key drivers underpinning the need for renewable energy within the UK, and why the government believes there is an urgent need for new electricity NSIPs are discussed throughout this section, with the NPSs in particular considered further in section 1.5 of this Planning statement.

1.4.2 The need for new nationally significant energy infrastructure projects and offshore wind projects

1.4.2.1 Part 2 of NPS EN-1 outlines the urgent need for all types of energy infrastructure in order to achieve energy security and dramatically reduce GHG emissions (paragraphs 2.3.5).

1.4.2.2 When determining applications for offshore wind this should be done on the basis that the Government has demonstrated that there is a need for this type of infrastructure and subsequently substantial weight should be given to the contribution these projects would make towards satisfying this need. However, NPS EN-1 (paragraph 3.2.8) also confirms that when determining applications for national infrastructure, the Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in the NPS.

1.4.2.3 Whilst there is a general presumption in favour of consenting NSIPs based on the Government's assessment of the need for electricity generating capacity as set out in paragraphs 3.3.57 – 3.3.63 of the NPS, the NPSs designated in January 2024 now include a strengthened presumption specifically in relation to critical national priority (CNP) infrastructure.

1.4.2.4 Paragraphs 3.3.62 and 4.2.4 of NPS EN-1 confirms that the Government "… has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure."

1.4.2.5 Paragraph 4.2.5 of NPS EN-1 confirms that offshore wind constitutes low carbon CNP infrastructure.

1.4.2.6 Therefore, as an offshore wind generation project, the Mona Offshore Wind Project is considered by NPS EN-1 to be low carbon CNP infrastructure.

1.4.2.7 The strengthened presumptions in favour of CNP infrastructure include that even "where non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure" (paragraph 4.2.16). The paragraph then goes on to confirm that " … in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts."

1.4.2.8 Paragraph 4.6.16 then confirms that the starting point for decision making is that CNP infrastructure is to be treated as if it has met any tests which are set out within the

NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality, or very special circumstances. This includes development within Green Belts, development affecting SSSIs, development in nationally designated landscapes and where there is substantial harm to or loss of significance to heritage assets (paragraph 4.2.17).

1.4.2.9 Similarly, in terms of any HRA or MCZ residual impacts, paragraphs 4.2.18 – 4.2.22 confirm that the starting point is that energy security and decarbonising the power section to combat climate change are capable of amounting to imperative reasons of overriding public interest (IROPI) with the benefit to the public being capable of outweighing the risk of environmental damage and NPS EN-1 imposes no limit on the number of CNP infrastructure projects that can be consented (Paragraph 4.2.21).

1.4.2.10 In terms of the requirements for applicants for CNP infrastructure, paragraphs 4.2.10 – 4.2.12 confirms that they must continue to show how their application meets the requirements of the NPSs applying the mitigation hierarchy, as well as any other legal and regulatory requirements. That they should also seek the advice of the appropriate SNCB or other relevant statutory body and demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated, setting out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success.

1.4.2.11 The exception to this presumption of consent are set out in NPS EN-1 paragraph 4.1.7. Whilst the paragraph reiterates that the need case will outweigh the residual effects in all but the most exceptional cases, it also states that those exceptions include residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero and to unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.

1.4.2.12 None of the above exceptions apply to the Mona Offshore Wind Project and it has evolved to ensure that the mitigation hierarchy has been met in relation to potential effects identified throughout the application preparation process such that there are no effects of the Mona Offshore Wind Project that should affect the strong presumption in favour of granting consent.

1.4.2.13 Part 3 of NPS EN-3 also confirms that the Government has concluded that there is a critical national priority for the provision of nationally significant new offshore wind development and supporting onshore and offshore network infrastructure.

1.4.2.14 In addition, Welsh Government has published ‘Energy Generation in Wales 2022’ which states that:

1.4.2.15 “In 2022, offshore wind accounts for over 28% of Welsh electricity generation, remaining a key contributor to the Welsh renewable generation mix. The 2022 revision of the UK’s offshore wind target to 50 GW of offshore wind, including 5 GW of floating offshore wind, indicates a vital area of future growth in renewable electricity generation for Wales.” This reinforces the need for offshore wind projects, such as the Mona Offshore Wind Project, in a Welsh national context.

1.4.3 The need to reduce greenhouse gas emissions

1.4.3.1 The UK is a signatory to the Kyoto protocol, which committed industrialized countries and economies to limit and reduce GHG emissions in accordance with agreed individual targets. The protocol came into effect in 2005 and its commitments were transposed into UK law by the Climate Act. This placed a duty on the UK to ensure that the net UK carbon account for the year 2050 is 80% lower than the 1990 baseline.

This was revised to a 'net zero target' of GHG emissions for the year 2050 to be 100% lower than the 1990 levels by the Climate Act (2050 Target Amendment) Order 2019.

1.4.3.2 In December 2015, 195 countries adopted the first ever universal, legally binding global climate deal at the Paris climate conference (COP21). The Paris Agreement (2016) sets out a global action plan towards climate neutrality with the aims of stopping the increase in global average temperature to below 2°C above pre-industrial levels, and to pursue efforts to limit global warming to 1.5°C. In November 2021, the UN Climate Change Conference (COP26) was held in Glasgow. The Glasgow Climate Pact, agreed by all parties, ensures the 1.5°C warming limit remains achievable but only with accelerated action on climate. Guidelines for how the Paris Agreement will be delivered were also completed at COP26.

1.4.3.3 Power sector emissions fell 17% in 2015 to 50% below 1990 levels. This follows an average annual decrease of 5% in the years between 2009 and 2014. This reduction is largely due to an increase in renewable and nuclear generation, equating to almost half of the UK's electricity demand in 2015 (CCC, 2016a). In order to achieve necessary ongoing reductions in emissions, the UK CCC recommended that the UK government should set out an intention to support 1 to 2 GW of offshore wind per year, provided costs continue to fall, with a view to phasing out subsidies in the 2020s (CCC, 2015a). The Mona Offshore Wind Project would contribute towards meeting these obligations.

1.4.4 Future increases in electricity demand

1.4.4.1 NPS EN-1 (paragraph 2.2.1) highlights the need for the UK to meet its 2050 emissions reductions goals.

1.4.4.2 Even with major improvements in overall energy efficiency, the Government expects that demand for electricity is likely to increase, as significant sectors of energy demand switch from being powered by fossil fuels to using electricity. As a result of this electrification of demand, total electricity consumption (measured in terawatt hours over a year) could double by 2050.

1.4.4.3 In 2020, the CCC identified that as demand grows, more capacity will be needed and their balanced scenario would necessitate deploying 3 GW a year of wind, to reach 430 TWh by 2050, and reach the target 40 GW of de-rated electricity capacity by 2030, and 65 to 125 GW by 2050 (CCC 2020).

1.4.4.4 NPS EN-1 concludes that in order to secure energy supplies that enable Government obligations for 2050 to be met, there is an urgent need for new (and particularly low carbon) energy NSIPs to be brought forward as soon as possible. The Mona Offshore Wind Project would contribute significantly towards meeting these obligations.

1.4.5 Role of offshore wind and the national policy support

1.4.5.1 The role of offshore wind is key in achieving the UK Government and Welsh renewable energy targets for 2030 and 2050. The offshore wind industry presents an opportunity to utilise and further develop the UK's maritime engineering skills as other industries decline (such as shipbuilding and North Sea oil) in order to secure supply chain and other employment opportunities in the UK. The importance of maximising opportunities for the involvement of local businesses and communities in offshore wind has been highlighted as a key success factor for the sector in the UK (The Crown Estate, 2014).

1.4.5.2 An ambition set out in the UK Government's Energy White Paper, 'Powering our Net Zero Future' 2021, the Net Zero Strategy: Build Back Greener (2021) and the British

Energy Security Strategy (2022) is to have 40GW offshore wind by 2030, a fourfold increase on today's installed capacity. This aligns with the Prime Minister's Ten Point Plan for a Green Industrial Revolution (2020). In addition, the UK Government would generate more power than all our homes use today, back new innovations to make the most of this proven technology and invest to bring new jobs and growth to our ports and coastal regions.

1.4.5.3 PPW11, paragraph 5.9.16, notes that "Wales has an abundant wind resource and, as a result, wind energy forms a key part of meeting the Welsh Government's vision for future renewable energy production".

Local policy support

1.4.5.4 The Denbighshire LDP recognises that "Climate change is perhaps one of the largest threats to our environment. Denbighshire needs to minimise the impact it has on climate change by ensuring new development can be accessed sustainably, minimises energy use, and by ensuring that the use of renewable energy is maximised wherever possible". This is supported through one of the key objectives for the LDP which is to ensure "that Denbighshire makes a significant contribution to reducing GHG through both supporting the principle of large wind farm development within identified zones and other suitable renewable energy technologies".

1.4.5.5 The Conwy LDP (2007 to 2022) similarly recognises that Conwy is vulnerable to the impacts of climate change, and that *there is a need to* […] *exploit renewable energy production through installed electricity generating capacity*. The support for renewable energy is further noted within Spatial Objective SO11 which highlights the LDP seeks the "*promotion of renewable energy developments where they have prospects of being economically attractive and environmentally and socially acceptable"*.

1.4.5.6 The Mona Offshore Wind Project will assist in meeting the national and local renewable energy production objectives.

1.5 Accordance with National Policy Statements and other national and local policy

1.5.1 Overview

1.5.1.1 This section presents the Mona Offshore Wind Project's accordance with each relevant NPS, as well as with other relevant policy including Welsh national policy, marine policy and relevant local planning policy, as set out in section 1.3.

1.5.1.2 With regards to the NPSs, updates to the original 2011 versions were published in November 2023 and were formally designated on 17 January 2024. Therefore, the application for consent and this Planning Statement has regard to the designated NPSs.

1.5.1.3 The individual topic chapters of the Environmental Statement submitted with this DCO application are considered below, having regard to the provisions the relevant NPSs and how their assessment of the Mona Offshore Wind Project has accorded with them. As mentioned in section 1.3 of this Planning Statement, further detail on accordance with the NPSs is provided in the NPS Tracker (Document Reference J2.1).

1.5.1.4 Each Environmental Statement topic is considered using the following structure:

- National Policy Statements

- Outlines the requirements of the relevant NPSs for the topic and how the Mona Offshore Wind Project has addressed these requirements

- Other policy considerations
  - Where other relevant planning policy requirements have been identified beyond the NPSs, consideration of how the Mona Offshore Wind Project has addressed those requirements in relation to each topic is set out in this section. In particular, in accordance with **NPS EN-1 paragraph 4.6.9**, because the Mona Offshore Wind Project is located offshore in Welsh waters and onshore in Wales, the Applicant has considered the guidance set out in PPW and the relevant policies in the Wales National Marine Plan

- Summary
  - Summarises the potential effects of the Mona Offshore Wind Project for each topic and provides a conclusion as to the topic's compliance with the NPSs and other policy considerations.

1.5.1.5 In terms of general Environmental Effects/Considerations Section 4.3 of NPS EN-1 sets out the approach that applicants should take. The Mona Offshore Wind Project has complied with the requirements of this section of NPS EN-1 as set out below.

1.5.1.6 As the Mona Offshore Wind Project is subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, the application is accompanied by an Environmental Statement as required by **NPS EN-1 paragraph 4.3.1**.

1.5.1.7 In accordance with **NPS EN-1 paragraph 4.3.10** the Environmental Statement provides information proportionate to the scale of the Mona Offshore Wind Project that is sufficient to meet the requirements of the EIA.

1.5.1.8 As set out in section 1.2.4 of this Planning Statement, and in accordance with NPS **EN-1 paragraphs 4.3.11 and 4.3.12**, which recognise that some details of a proposal may not be finalised, the Mona Offshore Wind Project has adopted an MDS based on Rochdale Envelope principles that ensures that it is assessed on the basis of a worst-case scenario in order to provide flexibility, whilst ensuring all potentially significant effects are assessed.

1.5.1.9 In order to avoid repetition in the topic sections below, it is also confirmed that all topics have assessed all phases of the Mona Offshore Wind Project (construction, operations and maintenance and decommissioning) and they all assess the potential cumulative effects of the Mona Offshore Wind Project in conjunction with other projects as well as potential transboundary effects.

1.5.1.10 Additionally, it is noted that a number of NPS EN-1 topic-specific sections refer to the 25 Year Environment Plan. The UK government set out its vision for a quarter of-a-century action to help the natural world regain and retain good health and a commitment to review the plan every five years was set into law in the Environment Act 2021. The Environmental Improvement Plan was published in 2023, which reinforces the intent of the 25 Year Environment Plan and sets out a plan to deliver on its framework and vision. The government's policy for biodiversity is set out in the Environmental Improvement Plan 2023, the aim of which is to halt overall biodiversity loss by 2030 and then reverse loss by 2042 in the context of the challenge presented by climate change.

1.5.1.11 The Environment Act 2021 sets out a number of targets and those that are relevant to the Mona Offshore Wind Project are considered in Table J2.1.1 of the NPS Tracker

(Document Reference J2.1) which forms an appendix to this Planning Statement. Table J2.1.1 provides a summary of the likely effects that the Mona Offshore Wind Project may have on those targets.

1.5.2 Physical Processes

1.5.2.1 This topic is assessed in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

1.5.2.2 Table 1.1 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to physical processes. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.1: Summary of National Policy Statements relevant to the physical processes assessment.

National Policy Statements – Paragraphs relevant to the Physical Processes assessment
NPS EN-1
Coastal Change – Applicant Assessment – Paragraph 5.6.10 – 5.6.13
NPS EN-3
Offshore Wind – Physical Environment - Paragraphs 2.8.112 – 2.8.114
Offshore Wind – Intertidal and coastal habitats and species – Paragraph 2.8.119
Offshore Wind – Subtidal habitats and species – Paragraph 2.8.123
Offshore Wind – Subtidal habitats and species – Paragraph 2.8.126
Offshore Wind – Other offshore infrastructure and activities – Paragraph 2.8.197 – 2.8.200
Offshore Wind - Mitigation – Paragraph 2.8.215
Offshore Wind – Physical Environment – Paragraph 2.8.224 and 2.8.225
Offshore Wind – Mitigation – Paragraph 2.8.227 – 2.8.231

1.5.2.3 The different procedures associated with the construction, operations and maintenance and decommissioning of the Mona Offshore Wind Project are considered within Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3).

1.5.2.4 As required by **NPS EN-1 paragraph 5.6.10** assessment of sediment dynamics was undertaken using the hydrodynamic and spectral wave modelling, together with an understanding of the sediment regime and predicted changes to the tidal current, wave climate, littoral currents and sediment transport are quantified in Volume 6, Annex 1.1: Physical processes technical report of the Environmental Statement (Document Reference F6.1.1).

1.5.2.5 In accordance with **NPS EN-1 paragraph 5.6.13** designated sites and features of importance within and surrounding the physical processes study area have been identified and further information is provided in the ISAA (Document Reference E1.2).

1.5.2.6 Potential impacts have also been identified and the significance of the effects on physical processes receptors has been assessed within Volume 2, Chapter 1: Physical

processes of the Environmental Statement (Document Reference F2.1) as required by **NPS EN-1 paragraph 5.6.11**.

1.5.2.7 The relevant statutory consultees have been consulted with throughout the assessment process in accordance with **NPS EN-1 paragraph 5.6.12** with details set out in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

1.5.2.8 In accordance with **NPS EN-3 paragraphs 2.8.112 to 2.8.114** and assessment of the significance of effects during installation of foundations and site preparation (construction phase) on physical processes receptors is detailed in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1) and an assessment of sediment dynamics undertaken using the hydrodynamic and spectral wave modelling, together with an understanding of the sediment regime is set out in Volume 6, Annex 1.1: Physical processes technical report of the Environmental Statement (Document Reference F6.1.1). Scour protection is included within the assessment as defined by the project description outlined in Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3).

1.5.2.9 The requirements of **NPS EN-3 paragraph 2.8.119** have been met. The Applicant has committed to trenchless techniques through the intertidal zone and the installation of cables has been assessed as part of the assessment of potential construction, operations and maintenance, and decommissioning impacts in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1). This includes assessment of the impact of increased suspended sediment loads and subsequent deposition during all phases.

1.5.2.10 In accordance with **NPS EN-3 paragraph 2.8.123** mitigation measures have been considered during consultation and included within the assessment in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1). This includes scour/cable protection techniques and cable burial techniques as set out in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

1.5.2.11 **NPS EN-3 paragraph 2.8.126** has been addressed in the assessment in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1) with the impact of increased suspended sediment loads and subsequent deposition being considered. Hydrodynamic modelling has been undertaken for the physical processes assessment (refer to Volume 6, Annex 1.1: Physical processes technical report of the Environmental Statement (Document Reference F6.1.1)).

1.5.2.12 It is considered that changes to bathymetry due to depressions left by jack-up vessels will be very limited and these are therefore scoped out of the assessment with justification presented in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

1.5.2.13 With regard to the requirements of **NPS EN-3 paragraphs 2.8.197 to 2.8.200**, the assessment in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1). includes the impact of increased suspended sediment loads and subsequent deposition. Legislative requirements for offshore wind farms are considered within Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document Reference F1.2) and the Cumulative Effects Assessment (CEA) was carried out in accordance with these procedures as detailed in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

1.5.2.14 Key issues have been raised and discussed during consultation activities and engagement specific to physical processes. A summary of the key issues and responses is provided in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

1.5.2.15 As required by **NPS EN-3 2.8.215**, the physical processes assessment has considered all relevant research and current guidance on avoidance, reduction and mitigation of potential effects. Installation and decommissioning methods have been designed to minimise physical effects as set out in section 1.9 in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

1.5.2.16 In accordance with **NPS EN-3 paragraphs 2.8.224 to 2.8.225**, measures adopted as part of the Mona Offshore Wind Project, including scour/cable protection techniques and cable burial techniques, have been considered during consultation and included within the assessment in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

1.5.2.17 In respect of **NPS EN-3 paragraphs 2.8.227 to 2.8.231** cable installation and decommissioning methods will be designed appropriately to minimise effects on intertidal/coastal habitats. The Applicant has committed to trenchless techniques for installation of the export cables through the intertidal zone, as set out within Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3).

1.5.2.18 Cable protection is assessed within Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1), however, the Mona Offshore Wind Project has committed to no cable protection being placed on the seabed within the intertidal zone, as described in Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3).

Other Policy Considerations

1.5.2.19 Table 1.2 below lists other national policy considerations relevant to the physical processes assessment.

Table 1.2: Summary of Other National Policy Considerations relevant to the Physical Processes Assessment.

Welsh National Marine Plan – Policies relevant to the Physical Processes assessment
ENV General Policy – Living within Environmental Limits – Policy ENV_01: Resilient marine ecosystems
ENV General Policy – Living within Environmental Limits - Policy ENV_02: Marine Protected Areas
SOC General Policy – Ensuring a Strong, Healthy and Just Society - SOC_09: Effects on Coastal Change and Flooding

1.5.2.20 **WNMP Policy ENV_01** has been addressed in relation to physical processes by ensuring designated sites and sites of interest due to ecological importance within the physical processes study area have been identified in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1). The potential impacts on these sites have been identified and the Mona Offshore Wind Project has committed to measures to avoid or minimise effects on physical processes receptors.

1.5.2.21 Similarly, **WNMP Policy ENV_02** has been addressed by ensuring that designated sites, sites of interest due to geological importance, and MPAs within the physical processes study area have been identified in Volume 2, Chapter 1: Physical processes

of the Environmental Statement (Document Reference F2.1 and the measures adopted as part of the Mona Offshore Wind Project to mitigate adverse impacts on those sites are assessed that chapter.

1.5.2.22 The assessment of sediment dynamics that has been undertaken using the hydrodynamic and spectral wave modelling, together with an understanding of the sediment regime (in Volume 6, Annex 1.1: Physical processes technical report of the Environmental Statement (Document Reference F6.1.1)) addresses the requirements of **WNMP Policy SOC_09**.

Summary

Summary of Effects

1.5.2.23 Information on physical processes within the physical processes study area was collected through detailed desktop review of existing studies and datasets and supported by numerical modelling, and the assessments were undertaken having full regard to the relevant sections of NPSs EN-1 and EN-3 as set out above.

1.5.2.24 Whilst those assessments have identified a number of potential effects on physical processes receptors due to the Mona Offshore Wind Project, all of these are considered to be negligible.

1.5.2.25 The potential effects of an increase in suspended sediments on physical features, due to construction, operations and maintenance and/or decommissioning related activities are of negligible significance as the sediment plumes arising during the construction phase will be localised and will not persist beyond the physical processes study area. Sedimentation will comprise of native material which is not expected to influence the bathymetry of receptors. Hydrodynamic processes are not altered by the diminutive level of bathymetric change as a result of the construction phase sediment releases. The increased sedimentation from the export cable installation causes a slight increase in sedimentation within the intertidal zone however it would be insufficient to affect beach morphology.

1.5.2.26 During the operations and maintenance phase the effects are reduced in comparison to the construction phase, as works are limited to intermittent, discrete repair activities. Overall, for all receptors associated with Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC, Great Ormes Head SSSI, Little Ormes Head SSSI and Constable Bank, the effect will be of negligible significance.

1.5.2.27 During the decommissioning phase increases in suspended sediment due to the removal of inter-array, interconnector and offshore export cables would be similar to those experienced during construction, as retrieval would be undertaken using similar techniques to installation. Increases may also occur during decommissioning if suction bucket foundations are removed, however the sediment plume would be short lived and localised in nature and would not interact with any designated areas.

1.5.2.28 The export cable route passes through the Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC and the Constable Bank with measures adopted as part of the Mona Offshore Wind Project being undertaken to minimise the sandwave clearance and cable protection placement in these areas. The Applicant has committed to no sandwave clearance in the Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC and no cable protection is anticipated on Constable Bank. The landfall site on the north Wales coastline intersects the Traeth Pensarn SSSI however any increase in sediment material would be native to the sediment cell and will therefore not affect geodiversity.

1.5.2.29 The temporary increased sedimentation from the offshore export cable installation causes little or no sedimentation in the intertidal zone which would be insufficient to affect beach morphology and the use of trenchless techniques at the landfall between Mean High Water Springs (MHWS) and Mean Low Water Springs (MLWS) avoids open-cut trenching and the need for cable protection. Overall, for all receptors in the intertidal zone, the effect will be negligible.

1.5.2.30 The presence of infrastructure may lead to changes in impacts to the tidal regime, wave regime and sediment transport and associated sediment transport pathways and associated potential effects along adjacent shorelines and physical features. The best form of cable protection is achieved through cable burial but where ground conditions mean this is not possible no more than a 5% reduction in water depth (referenced to Chart Datum) will occur at any point along the export cables without prior written approval from the Licensing Authority in consultation with the Maritime and Coastguard Agency (MCA).

1.5.2.31 Effects on receptors such as the sandbanks, reefs, mudflats and sandflats within the Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC, Traeth Pensarn SSSI and Constable Bank were deemed to be negligible. Minor changes in hydrodynamics could occur in close proximity to the location of the wind turbines but will not extend beyond the physical processes study area. The limited magnitude of changes observed would not alter the hydrography of sandbanks such as the Constable Bank which would remain unaffected.

1.5.2.32 During decommissioning, the magnitude of the effects in relation to suspended sediments would be similar to the construction phase as all structures above the seabed would be removed, with only scour protection to remain in situ. The residual effects on physical processes would be indiscernible from natural variability.

1.5.2.33 Cumulative effects from aggregate extraction activities and other offshore renewable developments were assessed and predicted to result in effects of negligible significance on physical processes receptors within a distance of two spring tidal excursions from the Mona Offshore Wind Project.

1.5.2.34 No transboundary effects with regard to physical processes from the Mona Offshore Wind Project on the interests of other European Economic Area (EEA) States are predicted.

Policy Compliance

1.5.2.35 With regard to physical processes, the Mona Offshore Wind Project has been assessed as required by the relevant NPSs and the WNMP.

1.5.2.36 Those assessments conclude that there will only be negligible effects arising from the Mona Offshore Wind Project during the construction, operations and maintenance or decommissioning phases.

1.5.2.37 Accordingly, it has been demonstrated that the Mona Offshore Wind Project accords with the requirements of NPS EN-1 and EN-3 and with Policies ENV_01, ENV_02 and SOC_09 of the WNMP.

1.5.2.38 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the negligible potential effects on physical processes.

1.5.3 Benthic Subtidal and Intertidal Ecology

1.5.3.1 This topic is assessed in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2).

1.5.3.2 Table 1.3 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to benthic subtidal and intertidal ecology. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.3: Summary of National Policy Statements relevant to the Benthic and Intertidal Ecology Assessment.

National Policy Statements – Paragraphs relevant to the Benthic Subtidal and Intertidal Ecology Assessment
NPS EN-1
Environmental Effects/Considerations - Applicant Assessment - Paragraph 4.3.10
Biodiversity and geological Conservation – Applicant Assessment - Paragraph 5.4.17
Biodiversity and geological Conservation – Applicant Assessment - Paragraph 5.4.19
Biodiversity and geological Conservation – Mitigation - Paragraph 5.4.35
Biodiversity and geological Conservation – Secretary of State Decision Making - Paragraph 5.4.42 and 5.4.43
Biodiversity and geological Conservation – Secretary of State Decision Making - Paragraph 5.4.48
Coastal Change – Applicant Assessment - Paragraph 5.6.13
NPS EN-3
Offshore Wind – Offshore wind environmental standards - Paragraph 2.8.90 – 2.8.92
Offshore Wind – Intertidal and coastal habitats and species - Paragraph 2.8.119
Offshore Wind - Subtidal habitats and species- Paragraph 2.8.126
Offshore Wind – Intertidal and coastal habitats and species - Paragraph 2.8.231

1.5.3.3 The EIA Scoping process has enabled the Mona Offshore Wind Project to deliver environmental information proportionate to the proposed development as required by **NPS EN-1 paragraph 4.3.10**. This is demonstrated in regard to the justification of the topics scoped out (Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2) as this demonstrates a proportionate approach.

1.5.3.4 In accordance with **NPS EN-1 paragraph 5.4.17 and 5.4.48**, all designated sites with relevant benthic ecology features which have the potential to be impacted by the Mona Offshore Wind Project as well as protected habitats and species within the benthic subtidal and intertidal ecology study area have been identified and considered in the assessment within Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2).

1.5.3.5 In accordance with **NPS EN-1 paragraph 5.6.13**, MCZs have been taken account of through the identification of designated sites within the Mona benthic subtidal and intertidal study area (Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement, Document Reference F2.2) As a result of this process

no MCZs have required consideration in the assessment. The impact of the Mona Offshore Wind Project on all habitats, species and sites protected under the The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) is assessed in the HRA Stage 1 Screening Report (Document Reference E1.1) and HRA Stage 2 Information to support the Appropriate Assessment (ISAA) (Document References E1.1, E1.2 and E1.3).

1.5.3.6 As required by **NPS EN-1 paragraphs 5.4.19, 5.4.35, 5.4.42 and 5.4.43**, the MDS represents the parameters that make up the realistic worst-case scenario. For benthic subtidal and intertidal ecology this has been presented in section 2.7.1 and Table 2.17 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2). This approach allows for an assessment of the maximum area required to work for each activity. The Mona Offshore Wind Project has considered the conservation status of habitats and species and aims to conserve habitats through a number of measures adopted as part of the Mona Offshore Wind Project that seek to avoid or reduce the magnitude of impacts in line with the mitigation hierarchy. These are included in the assessment in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2) and all such measures are set out in the Mitigation and Monitoring Schedule (Document Reference J10).

1.5.3.7 The Mona Offshore Wind Project is aware of the requirements in **NPS EN-3 paragraphs 2.8.90-92** to consider the relevant Offshore Wind Environmental Standards (OWES) to support developers to take a more consistent approach to avoiding, reducing, and mitigating the impacts of an offshore wind farms and/or offshore transmission infrastructure and has taken any existing guidance into account. It is noted, however, Defra will consult on a series of OWES before drafting clear OWES Guidance.

1.5.3.8 In accordance with **NPS EN-3 paragraph 2.8.119 and 2.8.126** the MDS for export cable installation at the landfall has been considered throughout the assessment in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2). This has ensured that a reasonable assessment of the effects of the various impacts associated with this method has been undertaken. Alternative landfall routes have been considered during site selection (Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement).

1.5.3.9 A description of the activities which could result in habitat disturbance from cable installation and maintenance and increased suspended sediments has been provided in Table 2.17 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2). Sites of conservation importance which may be directly or indirectly affected by the Mona Offshore Wind Project have been identified in section 2.5.3 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2). and the relevant benthic feature assessed in sections 2.9 and 2.11 of the chapter.

1.5.3.10 The predicted rates of recovery in the intertidal zone from temporary effects has been considered in the sensitivity of the intertidal biotopes and then used to determine the final significance of an impact (section 2.9.2 Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2).

1.5.3.11 The impacts of cable installation are much reduced following the commitment to use trenchless techniques in the intertidal zone and the reduction in other parameters

(including sandwave clearance and cable protection parameters) as a result of stakeholder feedback and review of further site-specific data.

1.5.3.12 The impact of suspended sediments, long term habitat loss and temporary habitat disturbance from cable installation and maintenance as well as anchors and vessel legs (i.e. jack-up legs) has been quantified in the MDS (Table 2.17 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement, Document Reference F2.2) and the effect of these impacts on the habitats within the Mona Array Area and Mona Offshore Cable Corridor and Access Area has been assessed throughout section 2.9 of the chapter.

1.5.3.13 The predicted rates of recovery in the intertidal zone from temporary effects has been considered in the sensitivity of the intertidal biotopes and used to determine the final significance of an impact (section 2.9.1 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement, Document Reference F2.2).

1.5.3.14 Assessments of the effects of EMF and invasive non-native species (INNS) have been considered in sections 2.9.9 and 2.9.6 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement, (Document Reference F2.2) respectively.

1.5.3.15 Relevant protected sites such as MCZs and SACs have been identified in section 2.5.3 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2) and those with benthic features directly or indirectly affected by the Mona Offshore Wind Project have been assessed in sections 2.9 and 2.11 of the chapter.

1.5.3.16 An evidence plan has been set up with the statutory nature conservation bodies (SNCBs) and other consultees to consult on topics such as sensitive subtidal environmental aspects (see section 2.3 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2). As part of this process an expert working group (EWG) for benthic ecology, physical processes and fish and shellfish ecology was set up. In terms of mitigation, measures have been adopted to avoid sensitive features at the landfall such as *Sabellaria alveolate.*

1.5.3.17 Cumulative effects have been quantified and their significance assessed in section 2.11 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2) in accordance with **NPS EN-3 paragraph 2.8.231**.

Other Policy Considerations

1.5.3.18 Table 1.4 below lists other national policy considerations relevant to the Benthic Subtidal and Intertidal Ecology Assessment.

Table 1.4: Summary of Other National Policy Considerations relevant to the Benthic Subtidal and Intertidal Ecology Assessment.

Welsh National Marine Plan – Policies relevant to the Benthic Subtidal and Intertidal Ecology Assessment
ENV General Policy – Living within Environmental Limits – Policy ENV_01: Resilient marine ecosystems
ENV General Policy – Living within Environmental Limits - Policy ENV_02: Marine Protected Areas
ENV General Policy – Living within Environmental Limits - Policy ENV_03: Invasive non-native species
ENV General Policy – Living within Environmental Limits – Policy ENV_04: Marine litter

Welsh National Marine Plan – Policies relevant to the Benthic Subtidal and Intertidal Ecology Assessment
ENV General Policy – Living within Environmental Limits – Policy ENV_05: Underwater noise
ENV General Policy – Living within Environmental Limits – Policy ENV_06: Air and water quality
ENV General Policy – Living within Environmental Limits - Policy ENV_07: Fish species and habitats
Ensuring a Strong, Healthy and Just Society: SOC_06: Designated landscapes
SOC General Policy – Ensuring a Strong, Healthy and Just Society - SOC_09: Effects on Coastal Change and Flooding
SOC General Policy – Ensuring a Strong, Healthy and Just Society - SOC_10: Minimising climate change
GOV General Policy – Promoting Good Governance - Policy GOV_01: Cumulative effects
FIS Sector Policy – Fisheries - FIS_01: Fisheries (supporting)

1.5.3.19 With regard to WNMP **Policies ENV_01 – ENV_07, SOC_06 and SOC_09** the extent of each potential impact on the benthic environment, having regard to the abundance and distribution of species and habitats, is considered throughout the Mona Offshore Wind Project alone assessment and the cumulative assessment (section 2.9 and 2.10 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2)). Consideration of the impact of the Mona Offshore Wind Project on designated sites is set out in section 2.5.3 and those which have the potential to be impacted have been considered throughout the assessment.

1.5.3.20 The potential impact of invasive non-native species in regard to the Mona Offshore Wind Project is assessed in section 2.9.6 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2).

1.5.3.21 Sea floor integrity is considered within the temporary habitat disturbance/loss and long -term habitat loss impacts (sections 2.91 and 2.94 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2)). These impacts consider pressures such as changes in substrate or seabed type and the sensitivity of the impacted habitats and species in relation to this pressure, in accordance with WNMP **Policy FIS_01.**

1.5.3.22 The long-term alteration of hydrographical conditions in relation to the placement of the Mona Offshore Wind Project infrastructure is considered as part of the changes in physical process impact (section 2.9.8 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2)). This section considers the changes in tidal, wave and sediment transport regime.

1.5.3.23 The effects of contaminants are considered in the remobilisation of sediment-bound contaminants impacts (section 2.9.3 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2)). This section evaluated the impact of historical contaminant on habitats.

1.5.3.24 Cumulative effects have been quantified and their significance assessed in section 2.11 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement (Document Reference F2.2) in accordance with WNMP **Policy GOV_01**.

Summary

Summary of Effects

1.5.3.25 Information on benthic subtidal and intertidal ecology within the benthic subtidal and intertidal ecology study area was collected through desktop studies and site-specific surveys, and the assessments were undertaken having full regard to the relevant sections of NPSs EN-1 and EN-3 as set out above.

1.5.3.26 Whilst those assessments have identified a number of potential benthic subtidal and intertidal effects due to the Mona Offshore Wind Project, all of these are considered to be either negligible or of minor adverse significance, which is. not significant in EIA terms.

1.5.3.27 Temporary habitat disturbance/loss due to cable installation and long-term habitat loss due to wind turbine foundations is considered to be of negligible to minor adverse significance for subtidal and intertidal habitats, as well as for the habitats identified within the overlap between the Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC and the Mona Offshore Cable Corridor. This conclusion was reached based on the small proportion of habitat loss predicted in the context of available habitats in the Mona benthic subtidal and intertidal ecology study area and because most of the disturbed habitat is sedimentary and is likely to recover following disturbance/loss.

1.5.3.28 The impacts within the Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC in particular are considered not to be significant due to measures adopted by the Project, such as a commitment to no sandwave clearance within the SAC and minimising cable protection within the SAC.

1.5.3.29 Additionally, no significant effects are predicted on the Annex I low resemblance stony reef (outside the SAC) Important Ecological Feature (IEF) within the Mona Array Area due to recoverability of this habitat from abrasion and smothering. No significant effects are predicted on protected potential seapens and burrowing megafauna habitats within the Mona Array Area either, due to their sedimentary nature which allows for recovery.

1.5.3.30 Increases in suspended sediment concentrations (SSCs) and associated deposition are also considered to be of negligible to minor adverse significance for the subtidal and intertidal habitats as well as the habitats identified within the overlap between the Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC and the Mona Offshore Cable Corridor. This conclusion was reached due to the short-term nature of the effect with sediments quickly dispersing and because most of the important ecological features are of low sensitivity to this type of impact.

1.5.3.31 Again, no significant effects are predicted on Annex I low resemblance stony reef (outside the SAC) IEF within the Mona Array Area due to the recoverability of this habitat. No significant effects are predicted on protected potential seapens and burrowing megafauna habitats within the Mona Array Area either, due to their sedimentary nature which allows for recovery.

1.5.3.32 Long term habitat loss/habitat alteration is considered to be of negligible to minor adverse significance for the subtidal habitats and the habitats identified within the overlap between the Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC and the Mona Offshore Cable Corridor and no long-term habitat loss in the intertidal area is predicted. This conclusion was reached due to the small area affected in relation to the Mona benthic subtidal and intertidal ecology study area.

1.5.3.33 Again, no significant effects are predicted on Annex I low resemblance stony reef (outside the SAC) IEF within the Mona Array Area due to the proportionately small area affected and no significant effects are predicted on protected potential seapens and burrowing megafauna habitats within the Mona Array Area either, due to their sedimentary nature which allows for recovery.

1.5.3.34 Cumulative effects from activities such as aggregate extraction and other offshore developments were assessed and are predicted to result in effects of negligible or minor adverse significance upon subtidal and intertidal benthic communities within a 50 km buffer of the Mona Offshore Wind Project.

1.5.3.35 Whilst there could be moderate adverse cumulative effects in the short to medium term from temporary habitat disturbance/loss associated with the Mona Offshore Wind Project, which would be significant in EIA terms, the significance of these effects is predicted to decrease to minor adverse in the long term as the sediments and associated benthic communities will recover over time. This would not be significant in EIA terms.

1.5.3.36 No transboundary effects with regard to benthic subtidal and intertidal ecology from the Mona Offshore Wind Project on the interests of other EEA States are predicted.

Policy Compliance

1.5.3.37 With regard to benthic subtidal and intertidal ecology, the Mona Offshore Wind Project has been assessed as required by the relevant NPSs and the WNMP as set out above.

1.5.3.38 Those assessments conclude that there will only be either negligible or minor adverse effects arising directly from the Mona Offshore Wind Project during the construction, operations and maintenance or decommissioning phases, which are not significant in EIA terms.

1.5.3.39 Whilst there could be moderate adverse cumulative effects in the short to medium term from temporary habitat disturbance/loss, the significance of these effects is predicted to decrease to minor adverse in the long term. This would not be significant in EIA terms.

1.5.3.40 Accordingly, it has been demonstrated that the Mona Offshore Wind Project accords with the requirements of NPS EN-1 and EN-3 and with Policies ENV_01, ENV_02 ENV_03, ENV_04, ENV_05, ENV_06, ENV_07, FIS_01 and GOV_01 of the WNMP.

1.5.3.41 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on benthic subtidal and intertidal ecology, which are not significant in EIA terms.

1.5.4 Fish and Shellfish Ecology

1.5.4.1 This topic is assessed in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3).

1.5.4.2 Table 1.5 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to fish and shellfish ecology. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in further detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.5: Summary of National Policy Statements relevant to the Fish and Shellfish Ecology Assessment.

National Policy Statements – Paragraphs relevant to Fish and Shellfish Ecology Assessment
NPS EN-1
Biodiversity and Geological Conservation – Mitigation - Paragraph 5.4.35 and 5.4.36
Biodiversity and Geological Conservation – Applicant Assessment - Paragraph 5.4.22
Noise and Vibration – Applicant Assessment - Paragraph 5.12.11 – 5.12.12
NPS EN-3
Offshore Wind – Other offshore infrastructure and activities - Paragraph 2.8.48
Offshore Wind – Biodiversity and ecological conservation - Paragraph 2.8.98
Offshore Wind - Fish - Paragraph 2.8.150 – 2.8.151
Offshore Wind – Other offshore infrastructure and activities - Paragraph 2.8.213 – 2.8.216
Offshore Wind – Biodiversity and ecological conservation - Paragraph 2.8.221 – 2.8.223
Offshore Wind – Fish - Paragraph 2.8.245 – 2.8.247

1.5.4.3 In order to comply with **NPS EN-1 paragraph 5.4.35** the MDS represents the parameters that make up the realistic worst-case scenario. This approach allows for an assessment of the maximum area required to work for each activity. Specific mitigation measures to minimise disturbance or damage to habitats have been identified within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) and are set out in the Mitigation and Monitoring Schedule (Document Reference J10), which also accords with the requirements of **NPS EN-3 paragraphs 2.8.213 to 2.8.216**.

1.5.4.4 With regard to the requirements of **NPS EN-1 paragraph 5.4.36** the Applicant intends to produce and implement a Biodiversity Management Strategy for the Mona Offshore Wind Project. The mechanisms through which the Applicant intends to achieve overall biodiversity benefit are presented in the Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7).

1.5.4.5 The Applicant has identified a number of opportunities within the Irish Sea which could deliver additional intertidal and offshore biodiversity benefits, including increases to the productivity of breeding seabirds, biodiversity enhancing cable protection, artificial reef blocks and restoration of fish and shellfish habitats outside of protected sites. In addition, the Applicant has confirmed that the site induction processes will incorporate the principles of the WiSe training scheme (or another similar scheme) to ensure that key personnel are aware of the need to minimise disturbance to marine life during the construction and operations and maintenance phase. The Applicant will continue to explore these opportunities as the project design develops, in collaboration with stakeholders post-consent.

1.5.4.6 In accordance with **NPS EN-3 paragraph 2.8.48** relevant stakeholders have been consulted as the application has been prepared, including through the Expert Working Groups (EWG), as outlined in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). A range of fisheries

stakeholders operating within the vicinity have been consulted on potential impacts and mitigation strategies.

1.5.4.7 As required by **NPS EN-3 paragraph 2.8.98**, the existing ecology and biodiversity of the Mona Offshore Wind Project's fish and shellfish ecology area has been examined in Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement (Document Reference F6.3.1) and the baseline assessment. Any changes expected have been identified in the MDS calculation, with the levels of impact on fish and shellfish receptors assessed in the assessment of significant effects in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3).

1.5.4.8 The impact of the Mona Offshore Wind Project on all habitats, species and sites protected under the Habitats Regulations is assessed in the HRA Stage 1 Screening Report and HRA Stage 2 Information to support the Appropriate Assessment (ISAA) (Document References E1.1, E1.2 and E1.3).

1.5.4.9 Important habitats for fish and shellfish, including spawning, nursery and migration routes have been considered in Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement (Document Reference F6.3.1). Effects on these, including sound and EMF impacts, have been assessed in accordance with **NPS EN-3 paragraph 2.8.150 to 2.8.151**.

1.5.4.10 In order to address **NPS EN-3 paragraphs 2.8.221 to 2.8.223**, the potential for future monitoring of any significant effects exists and outlines of these programmes are included in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). Whilst paragraph 3.11.9.1 of the chapter states that no specific extra future monitoring of fish and shellfish ecology is currently planned, it recognises that this can be considered further, if relevant, in the future.

1.5.4.11 As required by **NPS EN-3 paragraphs 2.8.245 to 2.8.247** cable protection specifications have been examined in the MDS and specific impacts of EMFs have been assessed in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3).

1.5.4.12 In order to address NPS EN-1 paragraphs 5.12.11 to 5.12.12, all relevant protected fish and shellfish ecology receptors which could be impacted by sound have been identified and assessed alone and cumulatively in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). Mitigation measures to reduce this impact, including soft-starts for piling activities, have been identified and discussed in section 3.8. In addition, the Mona Offshore Wind Project plans to develop an Underwater Sound Management Strategy (UWSMS) to support reduction of the impact magnitude associated with underwater sound from piling. An Outline UWSMS (Document Reference J16) is submitted with the Application. The detailed UWSMS will be developed and agreed with stakeholders post-consent.

1.5.4.13 Finally, the movement of mobile/migratory species is considered in the assessment across the UK and more widely across Europe in the cumulative and transboundary assessment in accordance with **NPS EN-1 paragraph 5.4.22**.

Other Policy Considerations

1.5.4.14 Table 1.6 below lists other national policy considerations relevant to the Fish and Shellfish Ecology Assessment.

Table 1.6: Summary of Other National Policy Considerations relevant to the Fish and Shellfish Ecology Assessment.

Welsh National Marine Plan – Policies relevant to the Fish and Shellfish Ecology Assessment
ENV General Policy – Living within Environmental Limits – Policy ENV_01: Resilient marine ecosystems
ENV General Policy – Living within Environmental Limits - Policy ENV_02: Marine Protected Areas
ENV General Policy – Living within Environmental Limits – Policy ENV_05: Underwater noise
ENV General Policy – Living within Environmental Limits - Policy ENV_07: Fish species and habitats
PPW 11 – Paragraphs relevant to the Fish and Shellfish Ecology Assessment
Biodiversity and Ecological Networks - Paragraph 6.4.4
Special Protection Areas, Special Areas of Conservation and Ramsar Sites - Paragraph 6.4.18

1.5.4.15 Potential impacts on fish and shellfish ecology receptors have been identified in the key parameters for assessment (see Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3)). Mitigation measures have been outlined and each impact has been assessed based on the best available information and literature (see Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3)) in accordance with **WNMP Policy ENV_01**.

1.5.4.16 Likewise, all relevant nearby MPAs and designated sites were identified through desktop review and stakeholder consultation and are examined in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). The potential impacts on designated sites as well as on the features of MCZs and SACs are considered within the MCZ Screening and ISAA (Document Reference E1) in accordance with **WNMP Policy ENV_02**.

1.5.4.17 With regard to **WNMP Policy ENV_05**, potential underwater noise impacts have been considered through specific modelling in Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement (Document Reference F5.3.1), with the findings assessed in the context of fish and shellfish ecology receptors in the underwater impacts.

1.5.4.18 Similarly, in relation to **WNMP Policy ENV_07** important feeding, breeding, and migration areas have been identified in Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement (Document Reference F6.3.1) and the level of potential impacts on these have been assessed, with measures adopted to prevent any significant effects identified. Those measures have been set out in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3).

1.5.4.19 The existing biodiversity surrounding the Mona Offshore Wind Project has been detailed in Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement (Document Reference F6.3.1) and has been summarised in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) so as to meet the requirements of **PPW11 paragraph 6.4.4** and all nearby designated sites with relevant fish and shellfish receptors which could be impacted by the Mona Offshore Wind Project have been identified and assessed alone and cumulatively in Volume 2, Chapter 3: Fish and shellfish ecology

of the Environmental Statement (Document Reference F2.3) in accordance with **PPW11 paragraph 6.4.18**.

Summary

Summary of Effects

1.5.4.20 Information on fish and shellfish ecology was collected through desktop review, with improved coverage of published literature ensured through stakeholder consultation, and incorporation of some site-specific data opportunistically collected during site surveys and the assessments were undertaken having full regard to the relevant sections of NPSs EN-1 and EN-3 as set out above.

1.5.4.21 Temporary and long-term habitat loss/disturbance were both deemed to be of minor adverse significance, which is not significant in EIA terms, to fish and shellfish receptors, as the proportion of habitat lost within the Mona Offshore Wind Project was predicted to be small in the context of other similar available habitats in the wider fish and shellfish ecology study area.

1.5.4.22 The impact of underwater sound from pile driving was assessed to potentially cause a significant effect to herring spawning at the mapped spawning grounds off the coast of the Isle of Man for the Mona Offshore Wind Project alone. This is due to the location of these grounds in relation to the Mona Offshore Wind Project and the sensitivity of this species to underwater sound impacts.

1.5.4.23 The Mona Offshore Wind Project has therefore committed to the development of an Underwater Sound Management Strategy (UWSMS), an outline version of which included as Document Reference J16. This makes commitments to investigate options to reduce any potentially significant effects to a non-significant level. It will consider further mitigation measure options, on the basis of a refined project design post-consent, when more detailed information is available. The mitigation measures in the outline UWSMS (Document Reference J16) would also result in a reduction of sound effects on other fish and shellfish receptors. The detailed UWSMS will be developed and agreed with stakeholders post-consent.

1.5.4.24 Cumulative effects were assessed within a 50 km radius of the Mona Offshore Wind Project for direct impacts, and a 100 km radius for underwater sound. These are predicted to result in negligible to minor adverse (non-significant) direct effects on fish and shellfish species. For underwater sound, the effect is assessed to be of moderate adverse significance in relation to herring and cod spawning. However, the Mona Offshore Wind Project's commitment to the development of a detailed UWSMS will reduce sound levels to ensure there are no significant effects.

1.5.4.25 No transboundary effects on the interests of other EEA States are predicted with regard to fish and shellfish ecology as a result of the Mona Offshore Wind Project.

Policy Compliance

1.5.4.26 With regard to fish and shellfish ecology, the Mona Offshore Wind Project has been assessed as required by the relevant NPSs, the WNMP and PPW11 as set out above.

1.5.4.27 Those assessments conclude that the only effect in relation to the Mona Offshore Wind Project alone that could be significant in EIA terms is to herring spawning off the coast of the Isle of Man. The Mona Offshore Wind Project has therefore committed to the development of an Underwater Sound Management Strategy (UWSMS), an outline version of which included as Document Reference J16 which will reduce effects to a

non-significant level. The detailed UWSMS will be developed and agreed with stakeholders post-consent.

1.5.4.28 Similarly, in relation to cumulative effects there is only one effect with the potential to be significant in EIA terms. This is the potential for underwater sound effects that could be of moderate adverse significance in relation to herring and cod spawning. However, the Mona Offshore Wind Project's commitment to a detailed UWSMS will reduce sound levels to mitigate such effects.

1.5.4.29 These effects must be considered having regard to NPS EN-1 paragraph 3.3.63 which confirms that the urgent need for CNP infrastructure "*will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy*" such that the presumption in favour of consent is not affected.

1.5.4.30 Accordingly, it has been demonstrated that the Mona Offshore Wind Project, subject to the mitigation adopted, accords with the requirements of NPS EN-1 and EN-3 and with Policies ENV_01, ENV_02, ENV_05, and ENV_07 of the WNMP, as well as with the relevant paragraphs of PPW11.

1.5.4.31 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on fish and shellfish.

1.5.5 Marine Mammals

1.5.5.1 This topic is assessed in Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).

1.5.5.2 Table 1.7 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to marine mammals. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in further detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.7: Summary of National Policy Statements relevant to the Marine Mammals.

National Policy Statements – Paragraphs relevant to the Marine Mammals Assessment
NPS EN-1
Biodiversity and Geological Conservation – Applicant Assessment - Paragraph 5.4.17
Biodiversity and Geological Conservation – Applicant Assessment - Paragraph 5.4.19
Biodiversity and Geological Conservation – Applicant Assessment - Paragraph 5.4.22
Biodiversity and Geological Conservation – Mitigation - Paragraph 5.4.35
NPS EN-3
Offshore Wind – Marine Protected Areas - Paragraph 2.8.52 and 2.8.53
Offshore Wind – Biodiversity and ecological conservation - Paragraph 2.8.98
Offshore Wind – Biodiversity and ecological conservation - Paragraph 2.8.102 – 2.8.107
Offshore Wind – Marine Mammals - Paragraph 2.8.131 – 2.8.135

Assessment

1.5.5.3 In accordance with **NPS EN-1 paragraphs 5.4.17 and 5.4.19**, the potential effects on internationally, nationally and locally designated sites for ecological or geological features of conservation importance have been identified and assessed for the Mona Offshore Wind Project in Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4), as well as in the HRA Stage 1 Screening Report (Document Reference E1.4) which identifies direct or indirect effects on such sites and the HRA Stage 2 ISAA – Part 2 (Document Reference E1.2), which assesses the effects on them.

1.5.5.4 Important protected areas for marine mammals are also identified and discussed in Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement (Document Reference F6.4.1) which informs the assessment in Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4). These documents also consider relevant MPAs as required by **NPS EN-3 paragraph 2.8.52**.

1.5.5.5 The specific ecological and biodiversity considerations that pertain to proposed offshore renewable energy infrastructure developments, including marine mammals, have also been considered as required by **NPS EN-3 paragraph 2.8.98**.

1.5.5.6 In accordance with **NPS EN-3 Paragraphs 2.8.131 to 2.8.132** the detailed technical baseline, including likely feeding areas, known birthing areas/haul out sites; known migration or commuting routes is presented within Volume 6, Annex 4.1: Marine mammal technical report of the Environmental Statement (Document Reference F6.41.) and baseline sound levels, predicted sound levels in relation to mortality, permanent threshold shift, temporary threshold shift and disturbance, soft-start sound levels according to proposed hammer and pile design and operational sound have been considered within Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement (Document Reference F5.3.1).

1.5.5.7 The duration of potentially disturbing activity including cumulative/in-combination effects with other plans or projects has also been presented in Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4) and collision risk and, where relevant, the potential for barrier effects have been considered.

1.5.5.8 As required by **NPS EN-3 paragraphs 2.8.104 to 2.8.107** the assessment methodologies and baseline data collection were consulted on through the marine mammal EWG with relevant data being collected from site specific surveys and as part of post-construction ecological monitoring from existing, operational offshore wind farms. Consultation has also been undertaken in accordance with NPS **EN-3 Paragraphs 2.8.133 to 2.8.135** in relation to noisy activities.

1.5.5.9 As required by **NPS EN-1 paragraph 5.4.35** and **NPS EN-3 paragraph 2.8.53** measures adopted as part of the Mona Offshore Wind Project to conserve biodiversity of marine mammals are presented in Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4) and are set out in the Mitigation and Monitoring Schedule (Document Reference J10).

1.5.5.10 In addition, in order to address **NPS EN-3 paragraphs 2.8.102 to 2.8.103** the Applicant's intentions for biodiversity benefit are presented in the Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7).

1.5.5.11 Specific measures adopted as part of the Mona Offshore Wind Project in relation to underwater sound are set out in the outline Underwater Sound Management Strategy

(Document Reference J16), the Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels document (Document Reference J17) and the outline Marine Mammal Mitigation Protocol (Document Reference J21).

1.5.5.12 The movement of mobile/migratory species such as marine mammals is considered in the assessment across the UK and more widely across Europe in the cumulative and transboundary assessment in accordance with **NPS EN-1 paragraph 5.4.22**.

Other Policy Considerations

1.5.5.13 Table 1.8 below lists other national policy considerations relevant to the marine mammals assessment.

Table 1.8: Summary of Other National Policy Considerations relevant to the Marine Mammals Assessment.

Welsh National Marine Plan – Policies relevant to the Marine Mammals Assessment
ENV General Policy – Living within Environmental Limits – Policy ENV_01: Resilient marine ecosystems
ENV General Policy – Living within Environmental Limits - Policy ENV_02: Marine Protected Areas
ENV General Policy – Living within Environmental Limits – Policy ENV_05: Underwater noise
GOV General Policy – Promoting Good Governance - Policy GOV_01: Cumulative effects

1.5.5.14 In accordance with **WNMP Policy ENV_01** potential impacts on marine mammal ecology have been addressed in Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4) and measures adopted as part of the Mona Offshore Wind Project that have been designed to minimise impacts on marine mammals are set out in Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).

1.5.5.15 Volume 2, Chapter 4 Marine mammals of the Environmental Statement (Document Reference F2.4) also assesses the potential impact of underwater sound from various activities on marine mammals taking into account primary and tertiary mitigation measures to reduce potential effects as required by **WNMP Policy ENV_05**.

1.5.5.16 For any given effect, where it has been considered that there is potential for residual significant effects, additional mitigation has been proposed. With regard to marine mammals this is set out in the outline Underwater Sound Management Strategy (Document Reference J16), the Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels document (Document Reference J17) and the outline Marine Mammal Mitigation Protocol (Document Reference J21).

1.5.5.17 Designated sites within the regional marine mammal study area have been identified and any potential impacts to features and the network of MPAs have been assessed in the HRA Stage 2 ISAA (Document Reference E1.2) to accord with **WNMP Policy ENV_02**.

1.5.5.18 Cumulative effects, as required by **WNMP Policy GOV_01**, have also been identified and assessed in Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).

Summary

Summary of Effects

1.5.5.19 Information on marine mammals was collected through desktop review, site surveys and consultation with the expert working group and the assessments were undertaken having full regard to the relevant sections of NPSs EN-1 and EN-3 and the WNMP as set out above.

1.5.5.20 Injury and disturbance from elevated underwater sound during piling as a result of the Mona Offshore Wind Project was deemed to be of minor adverse significance, not significant in EIA terms.

1.5.5.21 The underwater sound modelling predicted ranges which had the potential to result in injury and disturbance to a small number of animals. Taking account of measures adopted as part of the Mona Offshore Wind Project as set out in the outline Marine Mammal Mitigation Protocol (MMMP) (Document Reference J21), the Mona Offshore Wind Project would result in a very small risk of injury, as animals will be deterred beyond the predicted injury range. The outline MMMP (Document Reference J21) includes an initiation stage of a piling soft start and ramp-up and sets a maximum separation limit of 15 km and a minimum separation limit of 1.4 km for concurrent piling as well as a limit on the maximum hammer energy to be used during piling.

1.5.5.22 With regard to disturbance, it is considered that whilst a small number of animals could experience mild disturbance, this is unlikely to lead to population level effects. In addition, population modelling was carried out to explore the potential of disturbance during piling to affect the population trajectory over time for harbour porpoise, bottlenose dolphin, minke whale and grey seal, which confirmed that the impact of the Mona Offshore Wind Project was unlikely to lead to population level effects.

1.5.5.23 Similarly, the potential for an increased likelihood of injury of marine mammals due to collision with vessels is considered to be of minor adverse significance, not significant in EIA terms. Whilst an increase in vessel movements could lead to an increase in interactions between marine mammals and vessels, it is vessels travelling at 14 knots or faster are those most likely to cause death or serious injury to marine mammals. It is expected that vessels involved in the construction phase of the Mona Offshore Wind Project would travel slower than this and all vessels working on the Mona Offshore Wind Project will be required to follow the provisions set out in the Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels document (Document Reference J17) such that, in combination with the likelihood that animals will be deterred by the sound of moving vessels, the risk of collision is reduced.

1.5.5.24 The only potential significant effect as a result of the Mona Offshore Wind Project alone is in relation to elevated underwater sound during UXO clearance on harbour porpoise.

1.5.5.25 In relation to cumulative effects the only potentially significant effects could be as a result of behavioural disturbance during piling for bottlenose dolphin within the Irish Sea Management Unit (ISMU) and potential injury from UXO clearance for harbour porpoise. The cumulative effects of piling in projects across the Irish Sea could result in potential reductions to lifetime reproductive success to some individuals in the ISMU population. Disturbance in offshore areas during piling could lead to a longer duration over which individuals may be displaced from key feeding areas and therefore there may be a further reduction in the population size in the context of a declining ISMU population.

1.5.5.26 As stated previously, the Mona Offshore Wind Project has committed to the development of an UWSMS, an outline version of which has been submitted with the application for consent. This will investigate options to reduce any potential significant effects to a non-significant level and will be developed and agreed with stakeholders post-consent.

1.5.5.27 No transboundary effects with regard to marine mammals from the Mona Offshore Wind Project are predicted.

Policy Compliance

1.5.5.28 With regard to marine mammals, the Mona Offshore Wind Project has been assessed as required by the relevant NPSs and the WNMP.

1.5.5.29 Those assessments conclude that the only effect in relation to the Mona Offshore Wind Project alone that could be significant in EIA terms is in relation to elevated underwater sound during UXO clearance for harbour porpoise.

1.5.5.30 In relation to cumulative effects there is potential for significant effects as a result of behavioural disturbance during piling for bottlenose dolphin. There are also potential reductions in lifetime reproductive success to some individuals and a possible reduction in size of a declining ISMU population. The other potential effect is from injury from UXO clearance for harbour porpoise along with a small number of mammals potentially being exposed to sound levels that could elicit permanent auditory injury. However, the measures adopted by the Mona Offshore Wind Project which include the development of a detailed UWSMS (an outline UWSMS as Document Reference J16), the outline MMMP (Document Reference J21) and the Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels document (Document Reference J17) will ensure that all such effects are appropriately mitigated to a non-significant level and in any event, as confirmed by NPS EN-1 paragraph 3.3.63, the presumption in favour of consent for CNP infrastructure is not affected.

1.5.5.31 Accordingly, it has been demonstrated that the Mona Offshore Wind Project, subject to the mitigation proposed, accords with the requirements of NPS EN-1 and EN-3 and with Policies ENV_01, ENV_02 ENV_05, and GOV_01 of the WNMP.

1.5.5.32 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on marine mammals.

1.5.6 Offshore Ornithology

1.5.6.1 This topic is assessed in Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5).

1.5.6.2 Table 1.9 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to offshore ornithology. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.9: Summary of National Policy Statements relevant to the Offshore Ornithology Assessment.

National Policy Statements – Paragraphs relevant to the Offshore Ornithology Assessment
NPS EN-1
Biodiversity and Geological Conservation – Habitats Regulations - Paragraph 5.4.4 and 5.4.5

National Policy Statements – Paragraphs relevant to the Offshore Ornithology Assessment
Biodiversity and Geological Conservation – Sites of Specific Scientific Interest (SSSIs) Paragraph 5.4.7
Biodiversity and Geological Conservation – Protection and Enhancement of habitats and species - Paragraph 5.4.16 and 5.4.17
Biodiversity and Geological Conservation – Mitigation - Paragraph 5.4.35
NPS EN-3
Offshore Wind – Offshore wind environmental standards - Paragraph 2.8.90 – 2.8.92
Offshore Wind – Biodiversity and ecological Conservation - Paragraph 2.8.104
Offshore Wind – Birds - Paragraph 2.8.136
Offshore Wind – Birds - Paragraph 2.8.143 and 2.8.144

1.5.6.3 Assessment of the potential effects of the Mona Offshore Wind Project relevant to offshore ornithology are considered and the approach to mitigation is discussed in Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5). As required by **NPS EN-1 paragraphs 5.4.4, 5.4.5, 5.4.7 and 5.4.17** Internationally designated sites, including all relevant SSSIs, are identified in the chapter and are also described in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation of the Environmental Statement (Document Reference F6.5.1), with the findings of the HRA process reported in the HRA Stage 2 ISAA- Part 3 (Document Reference E1.3), which assesses the impact specifically on all European sites and is submitted alongside the Environmental Statement.

1.5.6.4 The baseline ornithological environment is described in Volume 6, Annex 5.1: Offshore ornithology baseline characterisation of the Environmental Statement (Document Reference F6.5.1). The assessment of the potential effects of the Mona Offshore Wind Project relevant to offshore ornithology is within section 5.7 of Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5) with Table 5.9 and Table 5.10 of the chapter presenting the identification of designated sites.

1.5.6.5 As required by **NPS EN-1 paragraph 5.4.16** the specific bird species that may be impacted by the potential effects of the Mona Offshore Wind Project are identified in Table 5.11 of Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5) and an assessment of the potential effects on those specific species is set out in section 5.7 of the chapter.

1.5.6.6 The assessment in Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5) considers collision risk modelling, displacement assessment, population viability assessment using parameters that have been agreed with SNCBs through the EWGs and potential effects from collision risk and displacement are presented and assessed in section 5.7 of the chapter to accord with **NPS EN-3 paragraph 2.8.136 and 2.8.144**.

1.5.6.7 Measures adopted as part of the Mona Offshore Wind Project relating to mitigation for specific species are identified and discussed in section 5.6 of Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5) respectively in accordance with **NPS EN-1 paragraph 5.4.35**. The Mitigation and Monitoring Schedule (Document Reference J10) sets out all measures adopted as part of the Mona Offshore Wind Project but in particular in relation to offshore ornithology, the Applicant intentions to biodiversity benefits are set out in the Biodiversity Benefit

and Green Infrastructure Statement (Document Reference J7). That document identifies a number of opportunities within the Irish Sea which could deliver additional intertidal and offshore biodiversity benefits, including increases to the productivity of breeding seabirds. Further measures to protect birds are set out in the Measures to Minimise Disturbance to Marine Mammals and Rafting Birds document (Document Reference J17).

1.5.6.8 In relation to **NPS EN-3 paragraphs 2.8.90 to 2.8.92** the Mona Offshore Wind Project is aware of the requirements to apply guidance on Environmental Standards once the final guidance is issued. The Mona Offshore Wind Project will review the guidance, once available, and consider how it complies.

1.5.6.9 In accordance with **NPS EN-3 paragraph 2.8.104**, throughout the evolution of the Mona Offshore Wind Project consultations with relevant statutory and non-statutory stakeholders have been carried out (e.g. via the Evidence Plan Process Expert Working Groups (EWG)). Information on this is presented in section 5.1.5 of Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5). A Scoping Report was submitted to the Planning Inspectorate and a Scoping Opinion was received, discussed in section 5.1 of the Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5). Furthermore, responses from the relevant statutory and non-statutory stakeholders were received following submission of the PEIR technical annexes and chapter. All the responses provided, and changes suggested by the stakeholders are presented in the consultation report (Document reference E3).

1.5.6.10 Offshore ornithology baseline survey methods were discussed with NRW, Natural England, the JNCC and the RSPB and through the EWG as required by **NPS EN-3 paragraph 2.8.143**.

Other Policy Considerations

1.5.6.11 Table 1.10 below lists other national policy considerations relevant to the offshore ornithology assessment.

Table 1.10: Summary of Other National Policy Considerations relevant to the Offshore Ornithology Assessment.

Welsh National Marine Plan – Policies relevant to the Offshore Ornithology Assessment
ENV General Policy – Living within Environmental Limits – Policy ENV_01: Resilient marine ecosystems
ENV General Policy – Living within Environmental Limits - Policy ENV_02: Marine Protected Areas
ENV General Policy – Living within Environmental Limits – Policy ENV_05: Underwater noise

1.5.6.12 The Mona Offshore Wind Project has met the requirements of **WNMP Polices ENV_01 and ENV_02** with regard to offshore ornithology by assessing the potential impacts on designated sites and important ecological features and the site network in Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5) and the HRA Stage 2 ISAA- Part 3 (Document Reference E1.3), with measures adopted as part of the Mona Offshore Wind Project summarised in the chapter and set out in the Mitigation and Monitoring Schedule (Document Reference J10), the Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7) and the Measures to Minimise Disturbance to Marine Mammals and Rafting Birds document (Document Reference J17).

1.5.6.13 **WNMP Policy ENV_05** has been addressed by the assessment of the impact of underwater and airborne sound from the Mona Offshore Wind Project on seabirds within Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5).

Summary

Summary of Effects

1.5.6.14 In order to inform the Environmental Statement, 24 months of site-specific surveys were undertaken between March 2020 and February 2022. The site-specific surveys characterised the distribution and number of seabirds within the Mona Offshore Ornithology Array Area study area. Offshore ornithology modelling to determine the risk of collisions between birds and wind turbines was also undertaken to inform the baseline and the assessments undertaken in relation to offshore ornithology have full regard to the relevant sections of NPSs EN-1 and EN-3 as set out above.

1.5.6.15 The Mona Offshore Wind Project has committed to measures to reduce disturbance to rafting birds from transiting vessels. These measures are set out in the Measures to Minimise Disturbance to Marine Mammals and Rafting Birds document (Document Reference J17) and it is considered with those measures in place, the effects of the Mona Offshore Wind Project in relation to offshore ornithology will be either negligible or minor adverse, which is not significant in EIA terms.

1.5.6.16 Disturbance of birds and displacement of birds from their preferred areas from sound and presence of vessels and infrastructure is considered to be negligible to minor adverse to the seabird species within the Mona Array Area and in the vicinity of the Mona Offshore Wind Project, due to the short-term nature of the effect during the construction and decommissioning phases. Furthermore, the seabirds recorded in the site-specific surveys over the Mona Array Area have a low sensitivity to the type of effect expected during the operations phase of the Mona Offshore Wind Project.

1.5.6.17 Indirect effects from sound affecting prey species of birds are also considered to be of negligible on ornithological receptors due to the short-term nature of the effect. Similarly, temporary habitat loss/disturbance and increased SSCs effects are considered to be negligible.

1.5.6.18 No significant effects in relation to collision are predicted on seabirds and migratory non-seabirds within the Mona Array Area and the barrier effect is also considered to be negligible. Furthermore, the combined collision risk and disturbance and displacement from airborne sound, underwater sound, and presence of vessels and infrastructure is considered to be minor adverse. Population modelling was carried out to explore the potential of the combined collision risk and disturbance and displacement to affect the population trajectory of common guillemot at selected colonies over time. The results confirmed the assessment that this combined effect would not lead to a population level effect.

1.5.6.19 Cumulative effects from offshore renewable developments upon seabirds within regional populations (i.e. Biologically Defined Minimum Population Scales) were assessed and were also predicted to be negligible to minor adverse, which is not significant in EIA terms. Population modelling was also carried out on the cumulative effect to explore the potential of the collision risk to affect the population trajectory over time for great black-backed gull and common guillemot. The results confirmed the assessment that this combined effect would not lead to a population level effect.

1.5.6.20 No transboundary effects with regard to offshore ornithology from the Mona Offshore Wind Project on the interests of other states are predicted.

Policy Compliance

1.5.6.21 With regard to offshore ornithology, the Mona Offshore Wind Project has been assessed as required by the relevant NPSs and the WNMP.

1.5.6.22 The assessments conclude that there will only be negligible or minor adverse effects arising from the Mona Offshore Wind Project during the construction, operations and maintenance or decommissioning phases, which are not significant in EIA terms.

1.5.6.23 Accordingly, it has been demonstrated that the Mona Offshore Wind Project accords with the requirements of NPS EN-1 and EN-3 and with Policies ENV_01, ENV_02 and ENV_05 of the WNMP.

1.5.6.24 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on offshore ornithology, which are not significant in EIA terms.

1.5.7 Commercial Fisheries

1.5.7.1 This topic is assessed in Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6).

1.5.7.2 Table 1.11 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to Commercial Fisheries. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.11: Summary of National Policy Statements relevant to the Commercial Fisheries Assessment.

National Policy Statements – Paragraphs relevant to the Commercial Fisheries Assessment
NPS EN-3
Offshore Wind – Commercial Fisheries and Fishing - Paragraph 2.8.153 – 2.8.164
Offshore Wind – Commercial Fisheries and Fishing - Paragraph 2.8.319 – 2.8.323
Offshore Wind – Commercial Fisheries and Fishing - Paragraph 2.8.250 and 2.8.251

1.5.7.3 Potential impacts to fish stocks arising from the Mona Offshore Wind Project have been assessed in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) and the potential impacts on the commercial fisheries that target those fish stocks are assessed in section 6.8 of Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6) as required by **NPS EN-3 paragraph 2.8.156**.

1.5.7.4 In terms of good practice and consultation, as required by **NPS EN-3 paragraph 2.8.154 to 2.8.155 and 2.8.159**, the Mona Offshore Wind Project undertook liaison with the fishing industry, via the Company Fisheries Liaison Officer (CFLO) and Fishing Industry Representative (FIR), was undertaken in accordance with the best practice guidance as outlined in outlined in section 6.5.1 of Volume 2, Chapter 6: Commercial

fisheries of the Environmental Statement (Document Reference F2.6). Consultation with relevant stakeholders (local, regional, national and international) was also undertaken for the Mona Offshore Wind Project and is also summarised in the chapter with further information provided in Volume 6, Annex 6.1: Commercial fisheries technical report of the Environmental Statement (Document Reference F6.6.1) and the Consultation Report (Document Reference E3).

1.5.7.5 As required by **NPS EN-3 paragraphs 2.8.157 and 2.8.158**, Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) outlines the potential impacts on fish stocks, including those of commercial interest. Baseline fisheries activity data was collated from official sources and through consultation, as described in Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6) and Volume 6, Annex 6.1: Commercial fisheries technical report of the Environmental Statement (Document Reference F6.6.1).

1.5.7.6 To ensure that potential impacts which may affect certain fleets/fisheries in different ways are fully assessed, a number of commercial fisheries receptor groups were identified through review of data and feedback from stakeholder consultation. A total of six main receptor groups were defined. These were categorised based on gear type, nature of fishing activity and nationality and are summarised in Table 6.8 of Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6). Displacement of commercial fisheries into other areas has been assessed for all phases of the Mona Offshore Wind Project in section 6.8.3 of the Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6). As such the assessment undertaken meets the requirements of **NPS EN-3 paragraphs 2.8.153 and 2.8.321**.

1.5.7.7 The potential impacts arising from the Mona Offshore Wind Project have been discussed with statutory bodies during consultation. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the Mona Offshore Wind Project as set out in section 6.3 of Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6). The Applicant is taking, and will continue to, take steps to minimise the effects upon the industry through appropriate mitigation, where required as set out in section 6.7 and 6.8 of the chapter. To communicate the commitments and measures adopted by the Mona Offshore Wind Project to co-exist with the fishing industry and reduce impacts on commercial fisheries as far as practicably possible, the Applicant has committed to the development of a Fisheries Co-existence and Liaison Plan, an outline of which has been submitted as part of the application (Document Reference J13) in accordance with **NPS EN-3 paragraphs 2.8.319-2.8.320, 2.8.322, 2.8.250 and 2.8.251**.

1.5.7.8 Transboundary issues are described in Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6), where consideration has been given to both UK and non-UK fishing fleets as required by **NPS EN-3 paragraph 2.8.160**.

1.5.7.9 Implications from the implementation of safety zones during both the construction and operations and maintenance phases of the Mona Offshore Wind Project are presented in Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6). Subject to consent, the Applicant intends to apply for temporary 500 m safety zones around the major construction vessels and any future major operations and maintenance vessel activities. Safety Zones are included within the MDS and have been considered within Volume 2, Chapter 7: Shipping and

navigation of the Environmental Statement (Document Reference F2.7) and Volume 6, Annex 7.1: Navigational Risk Assessment of the Environmental Statement (Document Reference F6.7.1) with further information in the Safety Zone Statement (Document Reference J6) in accordance with **NPS EN-3 paragraphs 2.8.161 to 2.8.164 and 2.8.323**.

Other Policy Considerations

1.5.7.10 Table 1.12 below lists other national policy considerations relevant to the commercial fisheries assessment.

Table 1.12: Summary of Other National Policy Considerations relevant to the Commercial Fisheries Assessment.

Welsh National Marine Plan – Policies relevant to the Commercial Fisheries Assessment
GOV General Policy – Promoting Good Governance - Policy GOV_01: Cumulative effects
GOV General Policy – Promoting Good Governance - Policy GOV_02: Cross-border and plan compatibility
Sector Safeguarding Policy - SAF_01: Safeguarding existing activity
ECON General Policy – Achieving a Sustainable Marine Economy – ECON_02: Co-existence

1.5.7.11 Impacts on commercial fisheries that may arise from the Mona Offshore Wind Project have been assessed in Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6), including cumulative and cross-border impacts as required by **WNMP Policies GOV_01 and GOV_02**.

1.5.7.12 The Mona Offshore Wind Project undertook liaison with the fishing industry, via the Company Fisheries Liaison Officer (CFLO) and Fishing Industry Representative (FIR), was undertaken in accordance with the best practice guidance as outlined in outlined in section 6.5.1 of Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6) and the Applicant is taking, and will continue to, take steps to minimise the effects upon the industry through appropriate mitigation, as set out in section 6.7 and 6.8 of the chapter. To communicate the commitments and measures adopted by the Mona Offshore Wind Project to co-exist with the fishing industry and reduce impacts on commercial fisheries as far as practicably possible, the Applicant has committed to the development of a Fisheries Co-existence and Liaison Plan, an outline of which has been submitted as part of the application (Document Reference J13) in accordance with **WNMP Policies SAF_01 and ECON_02**.

Summary

Summary of Effects

1.5.7.13 Information on commercial fisheries was collected through a review of official datasets, additional information and knowledge obtained through consultation with fisheries groups and site-specific surveys and the assessments were undertaken having full regard to the relevant sections of NPS EN-3 and the WNMP as set out above.

1.5.7.14 Following consultation feedback received at the Preliminary Environmental Information Report (PEIR) stage of the EIA process, the minimum spacing between the wind turbines was increased to allow continued fishing within the Mona Array Area and the rows of wind turbines will be aligned to allow for improved fishing access. Measures

adopted as part of the Mona Offshore Wind Project in relation to commercial fisheries are set out within the Outline Fisheries Liaison and Co-existence Plan (Document Reference J13). Taking these measures into account results in the potential effects of the Mona Offshore Wind Project being negligible or minor adverse, which is not significant in EIA terms.

1.5.7.15 Displacement of vessels into other fishing grounds can cause conflict with other fishing gears. However, during the construction phase of the Mona Offshore Wind Project this effect is considered as being negligible on all commercial fisheries receptor groups. This is due to the use of rolling construction zones and the temporary and intermittent nature of the works.

1.5.7.16 Loss or restricted access to fishing grounds is an impact that is of particular importance for Scottish west coast vessels, who rely on queen scallop grounds within and around the Mona Array Area. During construction, this effect is considered to be minor adverse on all commercial fisheries receptor groups, due to the temporary and intermittent nature of the works. During the operations and maintenance phases, a minor adverse effect is also predicted on the Scottish west coast scallop vessels receptor. To ensure effects are not significant the Outline Fisheries Liaison and Co-existence Plan (Document Reference J13) commits to maintaining an area free of wind turbines and OSPs over an area of over core scallop grounds within the Mona Array Area. This means that, as confirmed by NPS EN-1 paragraph 3.3.63, the presumption in favour of consent for CNP infrastructure is not affected.

1.5.7.17 As a result of the measures adopted as part of the Mona Offshore Wind Project, therefore, fishing, including that of Isle of Man vessels, will be able to continue within the Mona Array Area, and the effect of the Mona Offshore Wind Project in this regard will be negligible.

1.5.7.18 The main cumulative effect identified is between the Mona Offshore Wind Project and the Morgan Offshore Wind Project: Generation Assets for commercial fisheries focused on loss or restricted access to fishing grounds arising from the operations and maintenance phase. The Morgan Offshore Wind Project is expected to include similar measures as the adopted in the Outline Fisheries Liaison and Co-existence Plan (Document Reference J13) for the Mona Offshore Wind Project. Accordingly, this effect is considered to be minor adverse, which is not significant in EIA terms.

1.5.7.19 Transboundary effects outside UK waters are limited to the potential displacement from the Mona Offshore Wind Project into non-UK waters and potential effects on commercially important fish and shellfish resources which could occur in non-UK waters. However, it is not anticipated that these effects would be significant.

Policy Compliance

1.5.7.20 With regard to commercial fisheries, the Mona Offshore Wind Project has been assessed as required by the relevant NPSs and the WNMP.

1.5.7.21 Those assessments conclude that there will only be negligible or minor adverse effects arising from the Mona Offshore Wind Project during the construction, operations and maintenance or decommissioning phases.

1.5.7.22 Accordingly, it has been demonstrated that the Mona Offshore Wind Project accords with the requirements of NPS EN-1 and EN-3 and with Policies GOV_01, GOV_02, SAF_01 and ECON_02 of the WNMP.

1.5.7.23 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on commercial fisheries, which are not significant in EIA terms.

1.5.8 Shipping and Navigation

1.5.8.1 This topic is assessed in Volume 2 Chapter 7: Shipping and navigation of the Environmental Statement (Document Reference F2.7).

1.5.8.2 Table 1.13 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to shipping and navigation. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.13: Summary of National Policy Statements relevant to the Shipping and Navigation Assessment.

National Policy Statements – Paragraphs relevant to the Shipping and Navigation Assessment
NPS EN-3
Offshore Wind - Offshore wind impacts: navigation and shipping – Paragraphs 2.8.183 – 2.8.195
Offshore Wind - Navigation and shipping – Paragraph 2.8.326 and 2.8.327
Offshore Wind - Navigation and shipping– Paragraph 2.8.332 and 2.8.333
Offshore Wind - Navigation and shipping – Paragraph 2.8.335
Offshore Wind - Other offshore infrastructure and activities– Paragraph 2.8.348

1.5.8.3 As required by **NPS EN-3 paragraphs 2.8.183, 2.8.184, 2.8.185 and 2.8.348**, relevant stakeholders have been consulted throughout the EIA process, including the MCA. A summary of the key issues raised during consultation activities, the consultee and the consultation activity undertaken is provided in section 12.3 and Table 12.5 of Volume 2 Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7). A Marine Navigation Engagement Forum (MNEF) was established for the three Irish Sea Round 4 offshore wind projects. Two hazard workshops were undertaken and are described in Volume 6, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F2.7). A summary of the key issues raised during consultation activities, the consultee and the consultation activity undertaken is provided in section 12.3 and Table 12.5 of the chapter.

1.5.8.4 Information on internationally recognised sea lanes is presented in section 12.4.4 and the potential effects on vessel routeing measures are presented in sections 12.8.2 and 12.8.3 of Volume 2 Chapter 7 Shipping and Navigation of the Environmental Statement (Document Reference F2.7) in accordance with **NPS EN-3 paragraphs 2.8.187, 2.8.188, 2.8.326, 2.8.327 and 2.8.335**.

1.5.8.5 A Navigational Risk Assessment (NRA) was undertaken in accordance with the requirements of **NPS EN-3 paragraphs 2.8.189 and 2.8.190**. This is contained within Volume 6, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F6.7.1). The NRA was undertaken in accordance with Marine Guidance Note (MGN) 654, effects on navigation are described in section 12.8 of Volume 2 Chapter 7 Shipping and Navigation of the Environmental Statement

(Document Reference F2.7) and the guidance and process for producing the NRA is set out in Volume 6, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F6.7.1). As required by **NPS EN-3 paragraph 2.8.195** the NRA includes a Search and Rescue Response Assessment with effects on search and rescue described in section 12.8.6 of Volume 2 Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7).

1.5.8.6 To inform the assessment three 14-day vessel traffic surveys were conducted in compliance with the requirements of MGN654 and the survey findings are presented in section 12.4.4 of Volume 2 Chapter 7 Shipping and Navigation of the Environmental Statement (Document Reference F2.7) and Volume 6, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F6.7.1). The surveys included a summer survey, a winter survey and a top-up survey.

1.5.8.7 With regard to **NPS EN-3 paragraphs 2.8.191 to 2.8.194**, applied risk controls, including safety zones, are described in Volume 6, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F6.7.1), with additional risk control options identified in section 12.14 of Volume 2 Chapter 7 Shipping and Navigation of the Environmental Statement (Document Reference F2.7) and Volume 6, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F6.7.1).

1.5.8.8 As required by **NPS EN-3 paragraph 2.8.186**, impacts on shipborne and shore-based navigation, communication and positioning systems are described in section 7.9.9 of Volume 2 Chapter 7 Shipping and Navigation of the Environmental Statement (Document Reference F2.7).

1.5.8.9 Impact on vessel routeing is considered in sections 12.8.3 and 12.8.4 of Volume 2 Chapter 7 Shipping and Navigation of the Environmental Statement (Document Reference F2.7) for ferries and other commercial shipping. Routeing in both typical and adverse weather conditions is considered. Impacts to small craft routeing are considered in section 12.8.10 and the potential effects on recreational craft, in accordance with the requirements of **NPS EN-3 paragraphs 2.8.332 and 2.8.333** are considered within section 12.8.10 of Volume 2 Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7).

1.5.8.10 Relevant International Maritime Organisation (IMO) routeing measures, including the Liverpool Bay TSS, are also considered in relation to the Mona Array Area in Volume 6, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F6.7.1).

Other Policy Considerations

1.5.8.11 Table 1.14 below lists other national policy considerations relevant to the Shipping and Navigation Assessment.

Table 1.14: Summary of Other National Policy Considerations relevant to the Shipping and Navigation Assessment.

Welsh National Marine Plan – Policies relevant to the Shipping and Navigation Assessment
GOV General Policy – Promoting Good Governance - Policy GOV_01: Cumulative effects
Sector Safeguarding Policy - SAF_01: Safeguarding existing activity
ECON General Policy – Achieving a Sustainable Marine Economy – ECON_02: Co-existence

1.5.8.12 The shipping and navigation assessment for the Mona Offshore Wind Project has considered all the matters relevant to **WNMP Policies ECON_02, GOV_01 and SAF_01**. This includes consideration of effects on commercial shipping routes (sections 12.8.2, 12.8.3 and 12.8.4 of Volume 2 Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7)), and on the navigation safety of all marine users (sections 12.8 and 12.10 of Volume 6, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F6.7.1)) and the effects on recreational craft (section 12.8.10 of the chapter).

1.5.8.13 Applied risk controls, including safety zones, are described in Volume 6, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F6.7.1). Additional risk control options are identified in section 12.14 of Volume 2 Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7) and Volume 6, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F6.7.1).

1.5.8.14 The cumulative impacts of the Mona Offshore Wind Project on vessel routeing, collision and contact are considered in section 12.10 of Volume 2 Chapter 7 Shipping and Navigation of the Environmental Statement (Document Reference F2.7).

Summary

Summary of Effects

1.5.8.15 As set out above, the assessments undertaken in relation to shipping and navigation for the Mona Offshore Wind Project have given full regard to the relevant sections of NPSs EN-3 and the WNMP.

1.5.8.16 The Mona Offshore Wind Project has adopted a number of measures to reduce its effects on shipping and navigation. These include within the design of the infrastructure, promulgation of activities, development of plans and compliance with national and international best practice. These will be secured within the deemed marine license of the draft DCO and some of which are expected to be secured within the standalone NRW marine licence. As potentially significant effects were identified at PEIR stage, the Mona Offshore Wind Project has also committed to additional risk control options to reduce risks to Broadly Acceptable or Tolerable if As Low as Reasonably Practicable (ALARP), including:

- Reduction in the spatial extent of the Mona Array Area in the north, east and south
- Increase in separation between the Mona Array Area and the Liverpool Bay Traffic Separation Scheme (TSS)
- Commitment to two lines of orientation in the arrangement of wind turbines and OSPs.

1.5.8.17 Taking those measures into account, the majority of effects of the Mona Offshore Wind Project in relation to shipping and navigation are not considered to be significant. However, as a result of the presence of the Mona Array Area, the effect on adverse weather routeing for some ferry services is considered to be significant. During adverse weather conditions, Stena Line vessels operating between Liverpool and Belfast, and Isle of Man Steam Packet Company vessels operating between Liverpool and Douglas navigate through the footprint of the Mona Array Area and, with the wind turbines in place, vessels would be required to deviate to the southwest of the Mona Array Area to maintain safe and comfortable vessel motions. This would cause longer journey

times and it is feasible that there may be additional cancellations of these services as a result.

1.5.8.18 Following the identification of the above effects, the Applicant has made substantial commitments to reduce them, including a reduction in the Mona Array Area and additional control measures. Despite this, the assessment has concluded that a significant effect in relation to adverse weather routing remains.

1.5.8.19 The Applicant has committed to engaging with affected stakeholders. The Applicant will seek to continue this engagement beyond submission of the application and run in parallel with the application determination process.

1.5.8.20 Following the identification of significant cumulative effects on commercial operators including strategic routes and lifeline ferries within the PEIR, the Applicant has made substantial commitments to reduce these effects, including a reduction to the Mona Array Area and additional control measures. Similar commitments made by the Morgan Generation Assets and Morecambe Generation Assets have further contributed to a reduction in this impact. This assessment has confirmed that whilst routes between the three array areas and existing offshore wind farms would be created which could increase the risk of collision and allision, these risks were judged to be ALARP and manageable via operational procedures.

1.5.8.21 However, taking account of the Mooir Vannin Offshore Wind Farm (OWF) which could result in a reduction in searoom for the routes, the cumulative effect on risks of collision and allision is considered to be significant. As the predicted effect results from the addition of Mooir Vannin OWF, no further mitigation is proposed by the Applicant. It is noted that the Mooir Vannin OWF Limited (2023) Shipping and Navigation Impact Assessment will be undertaken in line with MCA MGN654 and its 'Methodology for Assessing Marine Navigational Safety and Emergency Response Risks'. It is therefore assumed that, in line with accepted EIA practice, that potential cumulative effects will be considered by Mooir Vannin OWF in its assessment and that they will be considered through its consenting process.

1.5.8.22 No significant transboundary effects with regard to shipping and navigation from the Mona Offshore Wind Project on the interests of other EEA States are predicted.

Policy Compliance

1.5.8.23 With regard to shipping and navigation, the Mona Offshore Wind Project has been assessed as required by the relevant NPSs and the WNMP.

1.5.8.24 Those assessments conclude that taking into account the measures adopted by the Applicant, the majority of effects of the Mona Offshore Wind Project in relation to shipping and navigation are not considered to be significant. However, as a result of the presence of the Mona Array Area, the effect on adverse weather routeing for some ferry services (Stena Line between Liverpool and Belfast and Isle of Man Steam Packet Company between Liverpool and Douglas) could be significant. The Applicant has committed to engaging with affected stakeholders and will seek to continue this engagement beyond submission of the application and run in parallel with the application determination process.

1.5.8.25 In addition, these effects do not present an "*unacceptable risk to, or interference with, human health and public safety*" so the presumption in favour of consent for CNP is not affected, in accordance with NPS EN-1 paragraph 4.1.7.

1.5.8.26 In terms of significant cumulative effects, as the effect results from the addition of Mooir Vannin OWF, no further mitigation is proposed by the Applicant. This is because the

Mooir Vannin OWF Shipping and Navigation Impact Assessment will be undertaken in line with MCA MGN654 and its 'Methodology for Assessing Marine Navigational Safety and Emergency Response Risks' such that, in line with accepted EIA practice, the potential cumulative effects will be considered by Mooir Vannin OWF and that they will be considered through its consenting process.

1.5.8.27 Notwithstanding the potential cumulative effects above, it is considered that the Mona Offshore Wind Project, subject to the mitigation proposed, accords with the requirements of NPS EN-1 and with NPS EN-3 which recognises at paragraph 2.8.178 that it is inevitable that offshore wind farms will have an impact on navigation in and around the area of their sites, as well as with Policies ECON_02, GOV_01 and SAF_01 of the WNMP.

1.5.8.28 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on shipping and navigation.

1.5.9 Seascape and Visual Resources

1.5.9.1 This topic is assessed in Volume 2, Chapter 8: Seascape and Visual Resources of the Environmental Statement (Document Reference F2.8).

1.5.9.2 Table 1.15 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to Seascape and Visual Resources. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.15: Summary of National Policy Statements relevant to the Seascape and Visual Resources Assessment.

National Policy Statements – Paragraphs relevant to the Seascape and Visual Resources Assessment
NPS EN-1
Landscape and Visual – Applicant Assessment - Paragraph 5.10.18
Landscape and Visual – Mitigation - Paragraph 5.10.26
Landscape and Visual – Secretary of State Decision Making - Paragraph 5.10.34
NPS EN-3
Offshore Wind - Seascape and visual effects - Paragraph 2.8.208
Offshore Wind - Seascape and visual effects - Paragraph 2.8.210 – 2.8.212
Offshore Wind - Seascape and visual effects - Paragraph 2.8.263 and 2.8.264
Offshore Wind - Seascape and visual effects - Paragraph 2.8.349
Offshore Wind - Seascape and visual effects - Paragraph 2.8.352

1.5.9.3 As required by **NPS EN-1 paragraph 5.10.18** a seascape assessment has been undertaken for the Mona Offshore Wind Project. This has considered effects on nationally designated landscapes as required by **NPS EN-1 paragraph 5.10.34**.

1.5.9.4 The Mona Offshore Wind Project seascape assessment accords with **NPS EN-3 paragraphs 2.8.208 and 2.8.210 to 2.8.212**. The existing seascape and landscape character and assessments are described in Volume 6, Annex 8.2: Seascape and

landscape character baseline technical report of the Environmental Statement (Document Reference F6.8.2). Relevant planning policy used to inform the assessment is outlined in Volume 6, Annex 8.1: Seascape and visual resources legislation and planning policy context of the Environmental Statement (Document Reference F6.8.2) and national policy is summarised in Table 8.1 of Volume 2, Chapter 8: Seascape and Visual Resources of the Environmental Statement (Document Reference F2.8). The assessment of effects on relevant seascape and landscape elements is in sections 8.8 and 8.11 of the chapter and is informed by a ZTV exercise based on the highest element of the offshore infrastructure, the wind turbines and Wirelines have been produced for representative viewpoints and are included in Volume 6, Annex 8.6: Seascape and landscape figures - offshore development of the Environmental Statement (Document Reference F6.8.6).

1.5.9.5 The assessment of the effects of the Mona Offshore Wind Project has been prepared in line with GLVIA3. Additional guidance, specifically pertaining to offshore windfarms has also been used in the assessment as set out in Table 8.7 of Volume 2, Chapter 8: Seascape and Visual Resources of the Environmental Statement (Document Reference F2.8).

1.5.9.6 As the Mona Array Area will be visible from the Eryri National Park, the Isle of Anglesey NL and the Clwydian Range and Dee Valley NL, effects on these designations are documented in Volume 6, Annex 8.5: International and nationally designated landscapes study – offshore development (Document Reference F6.8.5).

1.5.9.7 A cumulative impact assessment has also been undertaken and is presented in section 8.11 of Volume 2, Chapter 8: Seascape and Visual Resources of the Environmental Statement (Document Reference F2.8).

1.5.9.8 The likely significance of effects has informed the design development of the Mona Offshore Wind Project and the effects are reported in Volume 2, Chapter 8: Seascape and Visual Resources of the Environmental Statement (Document Reference F2.8) in Tables 8.21 and 8.22.

Other Policy Considerations

1.5.9.9 Table 1.16 below lists other national policy considerations relevant to the Seascape and Visual Resources Assessment.

Table 1.16: Summary of Other National Policy Considerations relevant to the Seascape and Visual Resources Assessment.

Welsh National Marine Plan – Policies relevant to the Seascape and Visual Resources Assessment
Ensuring a Strong, Healthy and Just Society: SOC_06: Designated landscapes
Ensuring a Strong, Healthy and Just Society: SOC_07: Seascapes

1.5.9.10 **SOC_06:** Proposals should demonstrate how potential impacts on the purposes and special qualities for which National Parks or Areas of Outstanding Natural Beauty have been designated have been taken into consideration and should, in order of preference: a. avoid adverse impacts on designated landscapes; and/or b. minimise impacts where they cannot be avoided; and/or c. mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or

mitigated, proposals must present a clear and convincing case for proceeding. Opportunities to enhance designated landscapes are encouraged.

1.5.9.11 **SOC_07:** Proposals should demonstrate how potential impacts on seascapes have been taken into consideration and should, in order of preference: a. avoid adverse impacts on seascapes; and/or b. minimise impacts where they cannot be avoided; and/or c. mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Opportunities to enhance seascapes are encouraged.

Summary

Summary of Effects

1.5.9.12 As set out above, the assessments undertaken in relation to seascape and visual resources for the Mona Offshore Wind Project have had full regard to the relevant sections of NPSs EN-1 and EN-3 and the WNMP.

1.5.9.13 The effects likely to arise in relation to seascape and visual resources are expected to be as a result of the following:

- 68 wind turbines on the assumption they are the tallest wind turbines (364 m maximum blade-tip height) which is the MDS for the seascape and visual resources assessment
- Four OSPs, each measuring 55 m by 65 m by 45 m (height above LAT by length by width)
- Construction and service vessels/helicopters.

1.5.9.14 Potential daytime and night-time effects associated with the construction, operations and maintenance and decommissioning phases of the offshore elements of the Mona Offshore Wind Project have been assessed and the majority of these effects are considered to be not significant.

1.5.9.15 Significant effects on parts of two seascape sensitivity zones (SSZs), areas of the sea within Welsh territorial waters, have the potential to arise as a result of the offshore elements of the Mona Offshore Wind Project due to:

- Temporary significant effects on the parts of SSZs 2 and 5 occupied by the construction and decommissioning activities in the Mona Array Area directly affected by the construction works. It is noted however that significant effects during construction and decommissioning on the entirety of these SSZs will not arise
- Long term significant effects on the parts of SSZs 2 and 5 occupied by the Mona Offshore Wind Project wind turbines and OSPs during operations and maintenance. It is noted however that significant effects during operations and maintenance on the entirety of these SSZs will not arise.

1.5.9.16 No significant visual effects are predicted to arise as a result of the offshore elements of the Mona Offshore Wind Project that are significant in EIA terms.

1.5.9.17 No significant effects are predicted to arise on the special qualities of the four nationally and internationally designated within the 60 km seascape and visual resources study area, which has been extended from 50 km specifically to allow assessment of effects on those landscapes). These include the Isle of Anglesey National Landscape, the Clwydian Range and Dee Valley National Landscape, Eryri (Snowdonia) National Park and the Lake District National Park and English Lake District World Heritage Site, as a result of the offshore components of the Mona Offshore Wind Project.

1.5.9.18 Given the above assessments, there are no specific mitigation measures for the offshore components of the Mona Offshore Wind Project.

Policy Compliance

1.5.9.19 With regard to seascape and visual resources, the Mona Offshore Wind Project has been assessed as required by the relevant NPSs.

1.5.9.20 Those assessments conclude that the majority of the effects of the Mona Offshore Wind Project are considered to be not significant. Whilst parts of SSZ 2 and SSZ 5 could experience temporary significant effects during construction and decommissioning activities and long-term significant effects during operations and maintenance, it is noted that those effects would not affect the entirety of the SSZs. In any event, as confirmed by NPS EN-1 paragraph 3.3.63, the presumption in favour of consent for CNP infrastructure is not affected by these effects.

1.5.9.21 Given the limited effects of the Mona Offshore Wind Project in relation to seascape and visual resources, there is no requirement for mitigation measures in this regard and as such, it is considered that the Mona Offshore Wind Project accords with the requirements of NPS EN-1 and EN-3.

1.5.9.22 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on seascape and visual resources.

1.5.10 Marine Archaeology

1.5.10.1 This topic is assessed in Volume 2, Chapter 9: Marine archaeology of the Environmental Statement (Document Reference F2.9).

1.5.10.2 Table 1.17 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to marine archaeology. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.17: Summary of National Policy Statements relevant to the Marine Archaeology Assessment.

National Policy Statements – Paragraphs relevant to the Marine Archaeology Assessment
NPS EN-3
Offshore Wind – Marine Historic Environment - Paragraphs 2.8.168 – 2.8.177
Offshore Wind – Marine Historic Environment - Paragraphs 2.8.252 – 2.8.255

1.5.10.3 In accordance with **NPS EN-3 paragraphs 2.8.168** consultation with relevant statutory and non-statutory stakeholders has been carried out from the early stages of the Mona Offshore Wind Project and through the Archaeology and Heritage Engagement Forum (AHEF) as reported in Volume 2, Chapter 9: Marine archaeology of the Environmental Statement (Document Reference F2.9).

1.5.10.4 A marine archaeology desk-based assessment and technical report has been produced which informs the archaeological assessment (see Volume 6, Annex 9.1: Marine archaeology technical report of the Environmental Statement (Document Reference F6.9.1)) as required by **NPS EN-3 paragraphs 2.8.169 and 2.8.170**. The archaeological review of geophysical data is included in Volume 6, Annex 9.1: Marine

archaeology technical report of the Environmental Statement (Document Reference F6.9.1) in accordance with **NPS EN-3 paragraph 2.8.171**. These documents inform the assessment required by **NPS EN-3 paragraph 2.8.177** in Volume 2, Chapter 9: Marine archaeology of the Environmental Statement (Document Reference F2.9).

1.5.10.5 **NPS EN-3 paragraph 2.8.172** recognises that the knowledge currently available about the historic environment in inshore and offshore areas is limited. As such, the measures adopted as part of Mona Offshore Wind Project include for any future geophysical and geotechnical surveys undertaken to result in the production of new archaeological data and, therefore, the understanding of the historic marine environment of the area. This is a beneficial effect of the Mona Offshore Wind Project and complies with **NPS EN-3 paragraph 2.8.176**.

1.5.10.6 As preferred by **NPS EN-3 paragraph 2.8.173 and 2.8.174** measures adopted as part of Mona Offshore Wind Project to mitigate marine archaeology effects are primarily avoidance, with the Mona Offshore Wind Project being designed to avoid known sensitive receptors through the provision of Archaeological Exclusion Zone's (AEZs) and Temporary Archaeological Exclusion Zones (TAEZs). Any potential adverse effects have however been assessed in Volume 2, Chapter 9: Marine archaeology of the Environmental Statement (Document Reference F2.9). This approach is also favoured by **NPS EN-3 paragraphs 2.8.252 to 2.8.254.**

1.5.10.7 The AEZs are discussed further in the Outline written scheme of investigation (WSI) and protocol for archaeological discoveries (PAD) (Document Reference J18) which has been produced in accordance with **NPS EN-3 paragraph 2.8.175**. This should ultimately assist with micrositing during the construction which is recognised by **NPS EN-3 paragraph 2.8.255** as being an important consideration for the Secretary of State when assessing the risk of damage to archaeology.

Other Policy Considerations

1.5.10.8 Table 1.18 below lists other national policy considerations relevant to the Marine Archaeology Assessment.

Table 1.18: Summary of Other National Policy Considerations relevant to the Marine Archaeology Assessment.

Welsh National Marine Plan – Policies relevant to the Marine Archaeology Assessment
SOC General Policy – Ensuring a Strong, Healthy and Just Society: SOC_05: Historic Assets

1.5.10.9 In accordance with **WNMP Policy SOC_05** and as set out above in relation to the requirements of the NPSs, the Environmental Statement has considered the significance of all known and potential heritage assets within the Mona marine archaeology study area. The assessment is included in Volume 2, Chapter 9: Marine archaeology of the Environmental Statement (Document Reference F2.9).

1.5.10.10 The measures adopted as part of Mona Offshore Wind Project include for any future geophysical and geotechnical surveys undertaken to result in the production of new archaeological data and, therefore, the understanding of the historic marine environment of the area. This is a beneficial effect of the Mona Offshore Wind Project.

1.5.10.11 In addition, an outline WSI and PAD (Document Reference J18) has been prepared to support the Mona Offshore Wind Project which sets out the high-level mitigation strategy for approval by the regulator and advisors.

Summary

Summary of Effects

1.5.10.12 Information on marine archaeology was collected through desktop review, site- specific surveys and consultation and, as set out above, the assessments undertaken in relation to marine archaeology for the Mona Offshore Wind Project have had full regard to the relevant sections of NPSs EN-1 and EN-3 and the WNMP.

1.5.10.13 A number of potential effects on marine archaeology, associated with the construction, operations and maintenance, and decommissioning phases of the Mona Offshore Wind Project, were identified including: sediment disturbance and deposition leading to indirect effects on marine archaeology; direct damage to marine archaeology receptors; direct damage to deeply buried marine archaeology receptors during the construction phase and alteration of sediment transport regimes leading to indirect effects to marine archaeology during the operations and maintenance phase of the Project.

1.5.10.14 The direct effects are considered to be of minor adverse significance which is not significant in EIA terms), especially as the measures adopted as part of the Mona Offshore Wind Project include the implementation and monitoring of AEZs around potential sensitive archaeological receptors which will ensure that no Mona Offshore Wind Project related activities will be carried out in proximity to those receptors.

1.5.10.15 Potential indirect effects through sediment disturbance and deposition and the alteration of sediment transport regimes are also considered to be of minor adverse significance because changes to physical processes as a result of the Mona Offshore Wind Project are limited to the immediate vicinity of the infrastructure and therefore the potential for the exposure and/or burial of marine archaeology receptors is minimal.

1.5.10.16 In addition, the measures adopted as part of the Mona Offshore Wind Project include the provision of an Outline WSI and PAD (Document Reference J18). This will ensure operational awareness of all known marine archaeology receptors in the vicinity of the Mona Offshore Wind Project and will also ensure that provisions are in place in the event that as yet unknown marine archaeology is discovered during the lifetime of the Mona Offshore Wind Project. A benefit of this is that any future geophysical and geotechnical surveys undertaken that result in the production of new archaeological data and, therefore, the understanding of the historic marine environment of the area will be made public.

1.5.10.17 Cumulative effects from other offshore renewable developments were assessed and are predicted to result in negligible or minor adverse effects upon marine archaeology within a 2 km buffer of the Mona Offshore Wind Project. These effects are not significant in EIA terms.

1.5.10.18 No transboundary effects with regard to marine archaeology from the Mona Offshore Wind Project on the interests of other EEA States are predicted.

Policy Compliance

1.5.10.19 With regard to marine archaeology, the Mona Offshore Wind Project has been assessed as required by the relevant NPSs and the WNMP.

1.5.10.20 Those assessments conclude that none of the effects of the Mona Offshore Wind Project in relation marine archaeology are considered to be significant, especially as the measures adopted as part of the Mona Offshore Wind Project include the

implementation and monitoring of AEZs around potential sensitive archaeological receptors which will ensure that no Mona Offshore Wind Project related activities will be carried out in proximity to those receptors.

1.5.10.21 Additionally, the provisions of the Outline WSI and PAD (Document Reference J18) will result in a beneficial effect in relation to marine archaeology resulting from the Mona Offshore Wind Project. This is because the Outline WSI and PAD ensure that any future geophysical and geotechnical surveys undertaken that result in the production of new archaeological data and, therefore, the understanding of the historic marine environment of the area will be made public.

1.5.10.22 Given the limited adverse effects and the beneficial effect of the Mona Offshore Wind Project in relation to marine archaeology, it is considered that the Mona Offshore Wind Project accords with the requirements of NPS EN-1 and EN-3 and with Policy and SOC_05 of the WNMP.

1.5.10.23 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects marine archaeology.

1.5.11 Other Sea Users

1.5.11.1 This topic is assessed in Volume 2, Chapter 10: Other sea users of the Environmental Statement (Document Reference F2.10).

1.5.11.2 Table 1.19 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to other sea users. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.19: Summary of National Policy Statements relevant to the Other Sea Users Assessment.

National Policy Statements – Paragraphs relevant to the Other Sea Users Assessment
NPS EN-3
Offshore Wind - Other offshore infrastructure and activities – Paragraph 2.8.197-198
Offshore Wind - Other offshore infrastructure and activities – Paragraph 2.8.200 and 2.8.201
Offshore Wind - Other offshore infrastructure and activities – Paragraph 2.8.344 – 2.8.346
Offshore Wind - Other offshore infrastructure and activities – Paragraph 2.8.261

1.5.11.3 As required by **NPS EN-3 paragraphs 2.8.197 and 198**, an assessment of the potential effects of the Mona Offshore Wind Project on existing or permitted infrastructure or activities has been undertaken. This is presented in Volume 2, Chapter 10: Other sea users of the Environmental Statement (Document Reference F2.10). The assessment has considered each phase of the development process (i.e. construction, operations and maintenance, and decommissioning).

1.5.11.4 As explained in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4), the Mona Offshore Wind Project has been sited to minimise conflicts with other sea users where possible to accord with **NPS EN-3 paragraph 2.8.345**.

1.5.11.5 A baseline environment considering other offshore infrastructure and activities is presented in Volume 2, Chapter 10: Other sea users of the Environmental Statement (Document Reference F2.10) and as required by **NPS EN-3 paragraphs 2.8.200, 2.8.201 and 2.8.261** consultation with potentially affected stakeholders has been carried out from the early stages of the Mona Offshore Wind Project and has continued through the pre-application consultation process. This consultation is reported in Table 10.5 of Volume 2, Chapter 10: Other sea users of the Environmental Statement (Document Reference F2.10).

1.5.11.6 **NPS EN-3 paragraph 2.8.44** recognises that offshore wind development will occur in or close to areas where there is other offshore infrastructure. The Mona Offshore Wind Project location adheres to the TCE Round 4 siting criteria and the Mona Array Area has been reduced following the statutory pre-application consultation, as described in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement. This has increased the distance from a number of other operational wind farms, thereby reducing the potential for operational effects on those wind farms. On the basis of the distances between the Mona Array Area and other operational wind farms the requirements of **NPS EN-3 paragraph 2.8.197** are not considered to be engaged.

Other Policy Considerations

1.5.11.7 Table 1.20 below lists other national policy considerations relevant to the other sea users assessment.

Table 1.20: Summary of Other National Policy Considerations relevant to the Other Sea Users Assessment.

Welsh National Marine Plan – Policies relevant to the Other Sea Users Assessment
Safeguarding Policy - SAF_01: Safeguarding existing activity

1.5.11.8 Volume 2, Chapter 10: Other sea users of the Environmental Statement (Document Reference F2.10) considers established activities such as aggregate extraction and disposal, infrastructure and recreational activities as required by WNMP **Policy SAF_01**. Impacts on these activities are assessed and measures adopted as part of the Mona Offshore Wind Project to reduce and/or avoid these impacts are presented in Volume 2, Chapter 10: Other sea users of the Environmental Statement (Document Reference F2.10).

1.5.11.9 Where significant adverse impacts were identified on established activities throughout the pre-application phase of the Mona Offshore Wind Project, steps were taken to ensure compatibility. Examples of these steps include the reduction in the Mona Array Area between the PEIR stage of the assessment process and that submitted with the application in order to be more compatible with other sea users, such as shipping receptors, and the ongoing consultation with stakeholders to ensure minimal temporal and spatial overlap between construction works associated with the Mona Offshore Wind Project and other sea users.

Summary

Summary of Effects

1.5.11.10 Information on other sea users within the local and regional other sea users study areas was collected through consultation and desktop reviews of available datasets and, as set out above, the assessments undertaken in relation to other sea users for the Mona Offshore Wind Project have had full regard to the relevant paragraphs of NPS EN-3 and Policy SAF_01 of the WNMP.

1.5.11.11 Measures adopted as part of the Mona Offshore Wind Project include:

- Safety zones around each of the wind turbines and OSPs whilst construction/decommissioning works are ongoing
- Communication of information advising on the nature, timing and location of activities, via Notices to Mariners
- Navigational aids and marine charting
- Development and adherence to a Cable Specification and Installation Plan to ensure that the cable remains secure, is not a hazard to other sea users and does not risk becoming exposed and damaged by tidal currents.

1.5.11.12 Effects considered in relation to other sea users associated with the construction, operations and maintenance, and decommissioning phases of the Mona Offshore Wind Project, have included: the displacement of recreational activities; increased SSCs and associated deposition affecting recreational diving and bathing sites; effects on existing cables or pipelines and restriction of access to them; a reduction or restriction of other offshore energy and interference with the performance of Radar Early Warning Systems (REWS) located on oil and gas platforms.

1.5.11.13 With the measures adopted as part of the Mona Offshore Wind Project in place, the likely effects in relation to those matters are considered to be minor adverse which is not significant in EIA terms.

1.5.11.14 The displacement of recreational activities is considered to be minor adverse for all phases of the Mona Offshore Wind Project due to the distance between the Mona Array Area and the nearest coastline (Anglesey - 28.8 km) and, accordingly, the low level of recreational activity within the Mona Array Area. There is also only low to moderate recreational sailing and motor cruising activity in the inshore areas of the Mona Offshore Cable Corridor and Access Areas.

1.5.11.15 The cumulative effects assessment in relation to other seas users undertaken for the Mona Offshore Wind Project concluded that all potential cumulative effects are minor adverse and not significant in EIA terms.

1.5.11.16 No transboundary effects with regard to other sea users from the Mona Offshore Wind Project on the interests of other EEA States are predicted.

Policy Compliance

1.5.11.17 Given there are no significant adverse effects of the Mona Offshore Wind Project in relation to other sea users, it is considered that the Mona Offshore Wind Project accords with the requirements of NPS EN-3 and with Policy and SAF_01 of the WNMP.

1.5.11.18 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on other sea users, which are not significant in EIA terms.

1.5.12 Inter-related Effects – Offshore

1.5.12.1 This topic is assessed in Volume 2, Chapter 11: Inter-related Effects – Offshore of the Environmental Statement (Document Reference F2.11).

1.5.12.2 Table 1.21 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to inter-related effects (Offshore). Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.21: Summary of National Policy Statements relevant to the Inter-related Effects (Offshore) Assessment.

National Policy Statements – Paragraphs relevant to the Inter-related Effects - Offshore Assessment
NPS EN-1
Environmental Effects/Considerations – Secretary of State Decision Making – Paragraph 4.3.19

1.5.12.3 In order to address **NPS EN-1 paragraph 4.3.19**, and inter-related effects (offshore) assessment has been undertaken for the Mona Offshore Wind Project. This is presented in Volume 2, Chapter 11: Inter-related Effects (Offshore) of the Environmental Statement (Document Reference F2.11) has been produced in order to provide this information.

Summary

Summary of Effects

1.5.12.4 As required by NPS EN-1 paragraph 4.3.19, Volume 2, Chapter 11: Inter-related effects (offshore) of the Environmental Statement (Document Reference F2.11) considers indirect and secondary likely significant inter-related impacts. For example, the separate impacts of sound and habitat loss may have an effect upon a single receptor such as marine mammals.

1.5.12.5 The overall significance of any inter-related effects is not judged to increase above the significance value assessed for individual effects in the topic-specific chapters.

1.5.12.6 Project lifetime effects can originate from impacts occurring on a receptor group over several phases of the Mona Offshore Wind Project. For example, a receptor group may experience impacts during the construction phase and the decommissioning phase of the Mona Offshore Wind Project. For all receptor groups identified, following the implementation of measures adopted as part of the Mona Offshore Wind Project and further mitigation (if required), impacts arising during the construction, operations and maintenance and decommissioning phases of the Mona Offshore Wind Project are unlikely to result in significant project lifetime effects.

Policy Compliance

1.5.12.7 The Mona Offshore Wind Project has been assessed as required by the NPS EN-1 with regard to inter-related effects.

1.5.12.8 Given that no inter-related effects are considered to increase the significance value assessed for individual effects in the topic-specific chapters and there are unlikely to be any significant project lifetime effects the presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the conclusions of the inter-related effects (offshore) assessment. .

1.5.13 Geology, hydrogeology and ground conditions

1.5.13.1 This topic is assessed in Volume 3, Chapter 1: Geology, hydrogeology and ground conditions of the Environmental Statement (Document Reference F3.1).

1.5.13.2 Table 1.22 below includes a list of paragraphs within the relevant NPSs that are considered relevant to the assessment undertaken in relation to geology, hydrogeology, and ground conditions. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.22: Summary of National Policy Statements relevant to Geology, hydrogeology and ground conditions Assessment.

National Policy Statements – Paragraphs relevant to the Geology, hydrogeology and ground conditions Assessment
NPS EN-1
Biodiversity and Geological Conservation – Applicant Assessment – Paragraph 5.4.17
Biodiversity and Geological Conservation – Applicant Assessment – Paragraph 5.4.19
Biodiversity and Geological Conservation – Mitigation – Paragraph 5.4.38
Land Use, Including Open Space, Green Infrastructure, and Green Belt– Applicant Assessment – Paragraph 5.11.17
Land Use, Including Open Space, Green Infrastructure, and Green Belt– Applicant Assessment – Paragraph 5.11.19

1.5.13.3 The effects of the Mona Offshore Wind Project on designated geological sites are considered in Volume 3, Chapter 1: Geology, hydrogeology and ground conditions of the Environmental Statement (Document Reference F3.1), as required by **NPS EN-1 paragraph 5.4.17**.

1.5.13.4 Sites of geological interest have largely been avoided by the refinement of the onshore cable route corridor and through the use of trenchless construction techniques. Mitigation measures relating to geology, hydrogeology and ground conditions are set out in Volume 3, Chapter 1: Geology, hydrogeology and ground conditions of the Environmental Statement (Document Reference F3.1) but, as no nationally or regionally designated geological sites will be affected by the Mona Offshore Wind Project, a Geodiversity Management Strategy is not considered to be necessary in order to comply with **NPS EN-1 paragraph 5.4.38**.

1.5.13.5 Ground conditions including areas of mining are identified in Volume 7, Annex 1.1: Aquifers, groundwater abstractions and ground conditions of the Environmental Statement (Document Reference F7.1.1). The Annex also summarises a qualitative

assessment of the risks posed by land contamination and the potential for contamination is also assessed in Volume 3, Chapter 1: Geology, hydrogeology and ground conditions of the Environmental Statement (Document Reference F3.1) such that the Mona Offshore Wind Project has ensured that the land used is suitable in accordance with **NPS EN-1 paragraph 5.11.17** and does not sterilise mineral resources in accordance with **NPS EN-1 paragraph 5.11.19**.

Other Policy Considerations

1.5.13.6 Table 1.23 below lists other local policy considerations relevant to the geology, hydrogeology and ground conditions assessment.

Table 1.23: Summary of Other Local Policy Considerations relevant to Geology, Hydrogeology and Ground Conditions Assessment.

Denbighshire County Council Local Development Plan – Policies relevant to the Geology, Hydrogeology and Ground Conditions Assessment
Policy VOE5 – Conservation of Natural Resources
Policy PSE15 – Safeguarding Minerals
Conwy County Borough Council: Adopted Local Development Plan - Policies relevant to the Geology, Hydrogeology and Ground Conditions Assessment
Strategic Policy DP/1 – Sustainable Development Principles
Strategic Policy NTE/1 – The Natural Environment
Strategic Policy MWS/1 – Minerals and Waste

1.5.13.7 The locations of nationally and regionally important geological sites are identified in Volume 7, Annex 1.1: Aquifers, groundwater abstractions and conditions of the Environmental Statement (Document Reference F7.1.1) and the potential impacts to these sites of geological interest are set out in Volume 3, Chapter 1: Geology, hydrogeology and ground conditions of the Environmental Statement (Document Reference F3.1).

1.5.13.8 The Mona Offshore Wind Project has sought to safeguard designated sites of geological interest by avoiding them through the refinement of the Onshore Cable Corridor and through the use of trenchless construction techniques such that no nationally or regionally designated geological sites will be affected by the Mona Offshore Wind Project in accordance **Policy VOE 5 of the Denbighshire LDP** and **Policy NTE/1 of the Conwy LDP**.

1.5.13.9 The Mona Onshore Development Area also avoids safeguarded mineral resources and the former Llanddulas Beach Landfill site will be avoided by using trenchless construction techniques as described in Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3) in order to accord with **Policy PSE 15 of the Denbighshire LDP** and **Policy MWS/1 of the Conwy LDP**.

1.5.13.10 The Mona Offshore Wind Project has adopted measures to protect soils during construction within the Outline Code of Construction Practice (CoCP) (Document Reference J26 which includes an Outline Soil Management Plan (Document J26.8) so as to accord with **Policy DP/1 of the Conwy LDP**.

Summary

Summary of Effects

1.5.13.11 Information on geology, hydrogeology and ground conditions for the Mona Offshore Wind Project was collected through a review of desktop information and the assessments undertaken have had full regard to the relevant paragraphs of NPS EN-1 as set out above.

1.5.13.12 As such the impacts on geology, hydrogeology and ground conditions associated with the construction, operations and maintenance, and decommissioning phases of the Mona Offshore Wind Project that have been assessed include:

- Loss of, or damage to, designated sites of geological and geomorphological interest
- Loss of, or damage to non-designated sites of geological and geomorphological interest
- Sterilisation of safeguarded limestone mineral resources
- Alteration and deterioration to groundwater quantity or quality in the glacial till and bedrock
- Ground stability issues associated with areas of historical deep mining operations
- Impact on private groundwater supply sources in terms of abstraction quantity, abstraction reliability and abstraction quality.

1.5.13.13 Measures adopted as part of the Mona Offshore Wind Project in relation to geology, hydrogeology and ground conditions include:

- The use of trenchless techniques for construction under the former Llanddulas Beach Landfill site and the Llanddulas Limestone and Gwrych Castle Wood SSSI
- Preparation of a final CoCP to ensure the effective management of environmental impacts during the construction phase. The final CoCP is secured through a requirement of the DCO; it will be in general accordance with the Outline CoCP (Document Reference J26) and will include mitigation measures for private groundwater supply sources and the following detailed management plans:
  - Construction Surface Water and Drainage Management Plan
  - Spillage and Emergency Response Plan
  - Discovery Strategy for Contaminated Land
  - Landfall Construction Method Statement
  - Onshore Construction Method Statement
  - Soil Management Plan.

1.5.13.14 Sites of geological interest have largely been avoided by the refinement of the Onshore Cable Corridor. The only designated site of geological and geomorphological interest within the Mona Onshore Development Area is the Llanddulas Limestone and Gwrych Castle Wood SSSI.

1.5.13.15 The Mona Offshore Wind Project has also sought to minimise potential effects on the by committing to use trenchless techniques to cross this feature. Non-designated drumlins would be affected by the construction of the Onshore Cable Corridor,

measures are included in the Soil Management Strategy (Document Reference J26.8) to restore the drumlins at the end of the construction process.

1.5.13.16 There are also not considered to be any significant potential effects in relation to the sterilisation of safeguarded limestone mineral resources; alteration to groundwater quantity or quality in the glacial till superficial aquifer, the Clwyd Limestone Group bedrock aquifer and the bedrock aquifers of the Ffernant Formation and Warwickshire Group.

1.5.13.17 Similarly, the effects on private groundwater abstractions, deterioration of groundwater quality in the Clwyd Limestone Group bedrock aquifer, the glacial till aquifer and the bedrock aquifers, as well as deterioration in groundwater quality as a result of accidental release or spillage of potentially polluting substances are not considered to be significant. There will, therefore, be no significant effects arising from the Mona Offshore Wind Project in relation to geology, hydrogeology and ground conditions.

1.5.13.18 No significant cumulative effects relating to geology, hydrogeology and ground condition receptors are anticipated.

1.5.13.19 Significant transboundary and inter-related effects are not anticipated with regard to geology, hydrogeology and ground conditions as a result of the Mona Offshore Wind Project upon the interests of other states.

Policy Compliance

1.5.13.20 With regard to geology, hydrogeology and ground conditions, the Mona Offshore Wind Project has been assessed as required by the relevant NPSs and the WNMP.

1.5.13.21 The measures adopted as part of the Mona Offshore Wind Project in relation to geology, hydrogeology and ground conditions include the use of trenchless techniques to install the onshore export cable under a designated site and the implementation of the CoCP (as secured through the DCO) and its associated management plans (e.g. a Discovery Strategy for Contaminated Land and a Soil Management Strategy).

1.5.13.22 Subject to those measures, the assessments conclude that none of the effects of the Mona Offshore Wind Project in relation to geology, hydrogeology and ground condition are considered to be significant.

1.5.13.23 Given the limited adverse effects of the Mona Offshore Wind Project in relation to geology, hydrogeology and ground conditions, it is considered that the Mona Offshore Wind Project accords with the requirements of NPS EN-1 and the relevant policies of both the Conwy and Denbighshire LDPs.

1.5.13.24 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on geology, hydrogeology and ground conditions, which are not significant in EIA terms.

1.5.14 Hydrology and Flood Risk

1.5.14.1 This topic is assessed in Volume 3 Chapter 2: Hydrology and flood risk of the Environmental Statement (Document Reference F3.2).

1.5.14.2 Table 1.24 below includes a list of paragraphs within the relevant NPSs that are considered relevant to the assessment undertaken in relation to hydrology and flood risk. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.24: Summary of National Policy Statements relevant to the Hydrology and Flood Risk Assessment.

National Policy Statements – Paragraphs relevant to the Hydrology and Flood Risk Assessment
NPS EN-1
Climate Change Adapatation – Paragraph 5.8.5
Flood Risk - Applicant Assessment - Paragraph 5.8.13 – 5.8.16
Water Quality and Resources - Applicant Assessment – Paragraphs 5.16.3
Water Quality and Resources - Applicant Assessment – Paragraph 5.16.7 – 5.16.10
Water Quality and Resources - Secretary of State Decision Making – Paragraph 5.16.14 – 5.16.16
Flood Risk – Secretary of State Decision Making - Paragraph 5.8.36
Flood Risk - Paragraph 5.8.7 – 5.8.9
Flood Risk - Paragraph 5.8.11 and 5.8.12
Flood Risk - Applicant Assessment - Paragraph 5.8.38 and 5.8.39
Flood Risk - Applicant Assessment - Paragraph 5.8.41 and 5.8.42

1.5.14.3 In accordance with **NPS EN-1 paragraphs 5.8.13 – 5.8.14**, Flood Consequences Assessments (FCAs) have been prepared for the Onshore Substation and Mona Onshore Development Area as both sites exceed 1ha or are partially located within Zone C. The FCAs consider all forms of flooding and are contained in Volume 7, Annex 2.1: Flood Consequences Assessment of the Environmental Statement (Document Reference F7.2.1). The FCAs meet all the requirements of **NPS EN-1 paragraph 5.8.15** and accord with the guidance in TAN15 as required by **NPS EN-1 paragraph 5.8.16**.

1.5.14.4 Also, **NPS EN-1 paragraphs 5.16.2, 5.6.13 and 5.16.7** in respect of assessing potential impacts on water quality and resources and the water environment have been addressed by the Water Framework Directive (WFD) Assessment that has been undertaken in accordance with the Planning Inspectorate Advice Note 18: The Water Framework Directive. The assessment considers the potential impact of the Mona Offshore Wind Project landward of MHWS during the construction, operations and maintenance, and decommissioning phases and is included as a technical Appendix to the Environmental Statement: Volume 7, Annex 2.4: Water Framework Directive surface water and groundwater assessment of the Environmental Statement (Document Reference F7.2.4).

1.5.14.5 NRW and the Conwy County Borough Council (CCBC) and Denbighshire County Council (DCC) as the relevant Lead Local Flood Authorities (LLFAs) have been consulted during the preparation of the application and their responses are included in Table 2.6 of Volume 3, Chapter 2: Hydrology and flood risk of the Environmental Statement (Document Reference F3.2).

1.5.14.6 The baseline environment is described for the hydrology and flood risk study area in section 2.4 of Volume 3, Chapter 2: Hydrology and flood risk of the Environmental Statement (Document Reference F3.2) and an assessment of the impacts on water quality, resources and physical characteristics is provided in section 2.8 of the chapter in accordance with **NPS EN-1 paragraphs 5.16.3**.

1.5.14.7 Baseline water quality and resources for the hydrology and flood risk study area are described in section 2.4.8 of Volume 3, Chapter 2: Hydrology and flood risk of the Environmental Statement (Document Reference F3.2). Watercourses in the hydrology and flood risk study area have been identified and information on abstractions, discharges, pollution incidents and water quality has been provided in Volume 7, Annex 2.3: Surface water abstraction licences, discharge consents and pollution incidents of the Environmental Statement (Document Reference F7.2.3) in accordance with **NPS EN-1 paragraph 5.16.7**.

1.5.14.8 The impacts on surface watercourses are described in section 2.8 of Volume 3, Chapter 2: Hydrology and flood risk of the Environmental Statement (Document Reference F3.2). SPZs are considered in Volume 3, Chapter 1: Geology, hydrogeology and ground conditions of the Environmental Statement (Document Reference F3.1) and this chapter confirms that there are no SPZs within the geology, hydrogeology and ground conditions study area in accordance with **NPS EN-1 paragraph 5.16.7**.

1.5.14.9 Again in accordance with **NPS EN-1 paragraph 5.16.7** a review of the WFD classifications for watercourses within the hydrology and flood risk study area has been undertaken (see Table 2.11 of Volume 3, Chapter 2: Hydrology and flood risk of the Environmental Statement (Document Reference F3.2)) and a WFD Assessment is presented in Volume 7, Annex 2.4: Water Framework Directive surface water and groundwater assessment of the Environmental Statement (Document Reference F7.2.4).

1.5.14.10 An Outline Operational Drainage Management Strategy for the Mona Onshore Substation layout has been included with the application (Document Reference J28). The proposed location of the attenuation basin has been identified in accordance with the requirements of NPS EN-1 **paragraphs 5.8.36, 5.8.38 and 5.8.39** and the SuDS Manual so as to provide sufficient attenuation storage for a 1 in 100 year plus climate change worst case storm event. Drainage provisions will ultimately be set out in an agreement with the relevant LLFA and/or SuDs Approval Body.

1.5.14.11 The Onshore Substation and the majority of the Mona Onshore Development Area are located entirely within Zone A with only the Mona Landfall Area being within Zones C1/C2 thereby generally avoiding Zone C2 as required by **NPS EN-1 paragraphs 5.8.41 and 5.8.42**.

1.5.14.12 A localised area of the Onshore Substation is shown to be at low risk from surface water flooding however, appropriate mitigation measures are outlined within the FCA (Volume 7, Annex 2.1: Flood Consequences Assessment of the Environmental Statement (Document Reference F7.2.1) in order to accord with **NPS EN-1 paragraphs 5.8.7 to 5.8.9**.

1.5.14.13 As required by **NPS EN-1 paragraph 5.8.11** a Justification Test has been undertaken for the Mona Landfall Area within Volume 7, Annex 2.1: Flood Consequences Assessment of the Environmental Statement (Document Reference F7.2.1) and confirmation is provided that the Mona Offshore Wind Project passes this test.

1.5.14.14 As required by **NPS EN-1 paragraphs 5.16.14 – 5.6.15** the FCA and the measures adopted as part of the Mona Offshore Wind Project have taken into account the requirements of the River Basin Management Plan, Shoreline Management Plan and WFD to ensure all potential impacts on the water environment are mitigated to within acceptable levels (see Table 2.21 of Volume 3, Chapter 2: Hydrology and flood risk of the Environmental Statement (Document Reference F3.2)).

1.5.14.15 Finally, to meet the requirements of **NPS EN-1 paragraphs 5.16.8 to 5.16.10 and 5.16.16** a detailed CoCP will be implemented to ensure the effective management of environmental impacts in relation to hydrology and flood risk during the construction phase. The detailed CoCP is secured through the DCO: it will be in general accordance with the Outline CoCP (Document Reference J26) and will include a Construction Surface Water and Drainage Management Plan; a Spillage and Emergency Response Plan; and a Flood Management Plan for the construction support works on Pensarn Beach. An Outline Operational Drainage Management Strategy is also submitted with the application (Document References J28).

Other Policy Considerations

1.5.14.16 Table 1.25 below lists other national policy considerations relevant to the hydrology and flood risk assessment.

Table 1.25: Summary of Other National Policy Considerations relevant to the Hydrology and Flood Risk Assessment.

PPW11 – Paragraphs relevant to the Hydrology and Flood Risk Assessment
Paragraph 6.6.22 - Development and Flood Risk
Paragraph 6.6.25 - Development and Flood Risk
Paragraph 6.6.27 - Development and Flood Risk
TAN15 Development and Flood Risk
Appendix 1 – Assessing Flood Consequences

1.5.14.17 In accordance with **PPW11 paragraphs 6.6.22, 6.6.25 and 6.6.27** and **TAN15** the site selection process, as detailed in Volume 1, Chapter 4 (Site selection and alternatives) of the Environmental Statement (Document Reference F1.4), has sought to avoid areas of flooding wherever practicable.

1.5.14.18 As indicated above, Volume 3 Chapter 2: Hydrology and flood risk of the Environmental Statement (Document Reference F3.2) is supported by FCAs for the Mona Onshore Substation and Mona Onshore Development Area as both sites exceed 1ha or are partially located within Zone C. The FCA consider all forms of flooding and are contained in Volume 7, Annex 2.1: Flood Consequences Assessment of the Environmental Statement (Document Reference F7.2.1) The FCA accord with the requirements of **TAN15 Appendix 1**.

1.5.14.19 The FCAs fully consider the consequences of flooding on the development, the consequences of the development on flood risk elsewhere and mitigation measures, where appropriate, as well as mechanisms of flooding, use of historical records and forecasting, the security of the Mona Offshore Wind Project over its lifetime, adequacy of defences and measures required to ensure flooding is managed to acceptable levels in the proportionate manner required.

1.5.14.20 Table 1.26 below lists other local policy considerations relevant to the hydrology and flood risk assessment. These include policies from the Conwy County Borough Council Local Development Plan and Denbighshire County Council Local Development Plan.

Table 1.26: Summary of Other Local Policy Considerations relevant to the Hydrology and Flood Risk Assessment.

Denbighshire County Council Local Development Plan – Policies relevant to the Hydrology and Flood Risk Assessment
Policy RD1 - Sustainable development and good standard design
Conwy County Borough Council: Adopted Local Development Plan - Policies relevant to the Hydrology and Flood Risk Assessment
Strategic Policy DP/1 – Sustainable Development Principles
Strategic Policy DP/3 – Promoting Design Quality and Reducing Crime
Strategic Policy NTE/8 – Sustainable Urban Drainage Systems

1.5.14.21 As above, flooding has been taken account of in the Mona Offshore Wind Project with any risk considered to be appropriate as set out in Volume 7, Annex 2.1: Flood Consequences Assessment of the Environmental Statement (Document Reference F7.2.1). The CoCP (Document Reference J26) has been prepared to ensure appropriate management of construction activities in relation to hydrology and flood risk. The FCA also considers sustainable drainage systems during the operations and maintenance phase which are set out in the Outline Operational Drainage Management Strategy (Document References J28). As such the Mona Offshore Wind Project accords with Policies **DP/1, DP/3 and NTE/8 of the Conwy LDP and Policy RD1 of the Denbighshire LDP.**

Summary

Summary of Effects

1.5.14.22 Information on hydrology and flood risk was collected through desktop review and a site-specific FCA and the assessments were undertaken in accordance with NPS EN-1, PPW, TAN15 and the relevant policies of the Conwy and Denbighshire LDPs, as set out above.

1.5.14.23 The Mona Offshore Wind Project has adopted a number of measures relating to hydrology and flood risk which include: the use of trenchless techniques to pass beneath Pensarn Beach and watercourses along the Onshore Cable Corridor. The preparation of a final CoCP is secured through the DCO and will include a Spillage and Emergency Response Plan, Construction Surface Water and Drainage Management Plan and Flood Management Plan for the construction support works on Pensarn Beach.

1.5.14.24 The construction of the Onshore Substation will require the realignment of an ordinary watercourse. The realignment of the watercourse will be designed to ensure existing capacity is maintained to afford conveyance of existing flows to mitigate upstream fluvial flood risk. The design of the realignment will be set out in the Operational Drainage Management Plan that is secured as a requirement of the DCO.

1.5.14.25 An Outline Operational Drainage Management Strategy (Document Reference J28) for the Onshore Substation is included in the DCO application. This includes measures to limit discharge rates and attenuate flows to maintain greenfield runoff rates at the Onshore Substation. It also includes measures to control surface water runoff,

including measures to prevent flooding of the working areas or offsite and to ensure any runoff is treated appropriately.

1.5.14.26 The Mona Offshore Wind Project has also committed to no work being carried out within 8 m of non-tidal water bodies unless agreed with the relevant lead local flood authority.

1.5.14.27 Hydrology and flood risk matters have been considered during the site selection process for the Mona Offshore Wind Project and throughout its design evolution as explained in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4). This includes matters such as siting of the temporary construction compounds, the haul road, construction accesses and the Mona Onshore Cable Corridor such that potential effects in relation to hydrology and flood risk have been minimised.

1.5.14.28 Taking into account the above and the measures adopted as part of the Mona Offshore Wind Project, no significant effects are considered likely to occur with respect to hydrology and flood risk during the construction, operations and maintenance and decommissioning phases of the Project.

1.5.14.29 The cumulative effects of the Mona Offshore Wind Project alongside other projects within a 1 km search area have also been assessed. This assessment has not identified any significant cumulative effects.

1.5.14.30 Similarly, no potential for significant transboundary effects with regard to hydrology and flood risk as a result of the Mona Offshore Wind Project have been identified upon the interests of other EEA States.

Policy Compliance

1.5.14.31 In terms of hydrology and flood risk, the Mona Offshore Wind Project has been assessed as required by the NPS EN-1, PPW, TAN15 and the relevant policies of the Conwy and Denbighshire LDPs.

1.5.14.32 Subject to the implementation of measures proposed as part of the Mona Offshore Wind Project, that assessment has confirmed that no significant effects in relation to hydrology and flood risk are considered likely.

1.5.14.33 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on hydrology and flood risk, which are not significant in EIA terms.

1.5.15 Onshore Ecology

1.5.15.1 This topic is assessed in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement (Document Reference F3.3).

1.5.15.2 Table 1.27 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to onshore ecology. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.27: Summary of National Policy Statements relevant to the Onshore Ecology Assessment.

National Policy Statements – Paragraphs relevant to the Onshore Ecology Assessment
NPS EN-1
Environmental and Biodiversity Net Gain – Applicant Assessment – Paragraph 4.6.6 – 4.6.11
Biodiversity and Geological Conservation – Applicant Assessment – Paragraph 5.4.17 – 5.4.22
Biodiversity and Geological Conservation – Applicant Assessment – Paragraph 5.4.32 – 5.4.36
Biodiversity and Geological Conservation – Secretary of State Decision Making – Paragraph 5.4.40
Biodiversity and Geological Conservation – Secretary of State Decision Making – Paragraph 5.4.42
Biodiversity and Geological Conservation – Secretary of State Decision Making – Paragraph 5.4.44 and 5.4.45
Biodiversity and Geological Conservation – Secretary of State Decision Making – Paragraph 5.4.48
Biodiversity and Geological Conservation – Secretary of State Decision Making – Paragraph 5.4.50
Biodiversity and Geological Conservation – Secretary of State Decision Making – Paragraph 5.4.53 – 5.4.54
Land Use, Including Open Space, Green Infrastructure, and Green Belt – Mitigation – Paragraph 5.11.27
NPS EN-3
Offshore Wind – Green Belts – Paragraph 2.8.68
Offshore Wind – Technical Consderations – Paragraph 2.8.72
Offshore Wind – Mitigation – Paragraph 2.8.215
Offshore Wind – Intertidal and coastal habitats and species – Paragraph 2.8.227
Offshore Wind – Intertidal and coastal habitats and species – Paragraph 2.8.230
NPS EN-5
Offshore-onshore transmission: Applicant Assessment - Coastal Connections – Paragraph 2.13.23

1.5.15.3 The Mona Offshore Wind Project will aim to conserve habitats through a number of measures adopted to reduce its environmental impact, including measures to preserve ecologically important features such as the development of an environmental management plan. These measures will be put in place to take advantage of opportunities to conserve ecological features of conservation interest and are presented in the Mitigation and Monitoring Schedule (Document Reference J10).

1.5.15.4 Relevant baseline data have been collected to identify and evaluate ecological features which could be affected by the Mona Offshore Wind Project, including protected species, species, habitats or principal importance and other habitats of ecological value; and internationally, nationally, and locally designated sites of ecological conservation importance sites within the development site onshore ecology desk study search area. Baseline data are provided in Volume 7, Annexes 3.1 to 3.15 technical reports to the Environmental Statement (Document References F7.3.1 to F7.3.15).

1.5.15.5 Early engagement was undertaken prior to the receipt of the Scoping Opinion (Document Reference J8) with consultation ongoing through the application preparation stage of the Mona Offshore Wind Project with the Expert Working Group (EWG) incorporating Natural Resources Wales (NRW), Colwyn County Borough Council (CCBC), Denbighshire County Council (DCC), the Royal Society for the Protection of Birds (RSPB) and the Amphibian and Reptile Conservation Trust (ARC). Evidence of early engagement with stakeholders, the issues discussed, and the agreed outcomes is provided in Table 3.8 of Volume 3, Chapter 3 of the Environmental Statement: Onshore Ecology (Document Reference F.3.3) with the feedback received being used to inform the project design, following the mitigation hierarchy as described in section 3.6 of Volume 3, Chapter 3 of the Environmental Statement: Onshore Ecology (Document Reference F3.3).

1.5.15.6 As required by **NPS EN-1 paragraphs 5.4.17, 5.4.18**, **5.4.48, 5.4.50 and 5.4.52** the potential effects on internationally, nationally and locally designated sites for ecological or geological features of conservation importance have been identified and assessed for the Mona Offshore Wind Project and the outcomes included in Volume 7, Annex 3.1: Onshore ecology desk study of the Environmental Statement (Document Reference F7.3.1) and Volume 7, Annex 3.2: Phase 1 habitat survey of the Environmental Statement (Document Reference F7.3.2). Potential effects are identified in section 3.9 of Volume 3, Chapter 3 of the Environmental Statement: Onshore Ecology (Document Reference F.3.3) with effects sought to be addressed by following the mitigation hierarchy as set out in section 3.6 of the chapter.

1.5.15.7 The aspects of the environment likely to be affected by the Mona Offshore Wind Project with respect to onshore ecology are addressed in section 3.9 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement (Document Reference F3.3).

1.5.15.8 In accordance with **NPS EN-1 paragraph 5.4.40**, the provisions of section 6 of the Environment (Wales) Act 2016 as implemented in PPW11 (including the October 2023 update to section 6.4) have been considered through the assessment process. The relevant requirements of PPW and NPSs are listed in Table 1.1 to Table 1.5 in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement (Document Reference F3.3) which also identify where and how these requirements have been met. See also section 3.8 and Table 3.23 of the chapter, the Outline LEMP (Document Reference J22) and the Outline Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7).

1.5.15.9 Cumulative effects between the Mona Offshore Wind Project and other projects/plans with respect to onshore ecology are considered in section 3.10 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement (Document Reference F3.3) and in Volume 5, Chapter 5.1: Cumulative effects screening matrix, of the Environmental Statement.

1.5.15.10 Transboundary effects are addressed in section 3.12 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement (Document Reference F3.3) and in Volume

5, Chapter 5.2: Transboundary effects screening of the Environmental Statement as required by **NPS EN-1 paragraph 5.4.22**.

1.5.15.11 Effects on ecological receptors have been avoided as far as possible through site design/layout and the use of trenchless techniques to avoid above ground features. As stated in Section 3.9 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement (Document Reference F3.3), where impacts could not be avoided, primary and tertiary mitigation measures have been adopted as part of the Mona Offshore Wind Project to avoid or minimise effects on onshore ecology.

1.5.15.12 Potential effects on legally protected species will be addressed through the relevant European Protected Species (EPS) derogation licensing (GCN and dormouse) and the mitigation measures outlined in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement (Document Reference F3.3), which have been designed to fulfil licensing requirements.

1.5.15.13 Mitigation measures have been agreed in consultation with the relevant stakeholders through ongoing consultation with the Expert Working Group (EWG) incorporating NRW, CCBC, DCC, RSPB, ARC, Welsh Government and Woodland Trust. Measures for mitigating adverse effects on onshore ecology are considered in section 3.8 and 3.14 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement (Document Reference F3.3), Outline LEMP (Document Reference J22) and the Outline CoCP (Document Reference J26). The mechanisms through which overall biodiversity benefit would be achieved by the Mona Offshore Wind Project are described in the Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7).

1.5.15.14 In addition to the measures delivered through the mitigation hierarchy, the Mona Offshore Wind Project aims to deliver ecological enhancement through new woodland and hedgerow planting and creation of grassland of higher ecological value than existing grassland within the Mona Onshore Development Area in accordance with **NPS EN-1 paragraphs 4.6.6 – 4.6.11, 5.4.19, 5.4.21, 5.4.33, 5.4.34, 5.4.42, 5.4.45 and 5.11.27**.

1.5.15.15 Specifically in relation to mitigation of construction activities, as required by **NPS EN-1 paragraph 5.4.35**, the Outline CoCP (Document Reference J26) and Outline LEMP (Document Reference J22) confirms that during construction activities will be confined to the minimum areas required for the works, that the timing of construction has been planned to avoid or limit disturbance, that best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised and, where practicable, habitats will be restored.

1.5.15.16 In addition, as set out in the Outline LEMP (Document Reference J22) and the Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7), opportunities will be taken to enhance existing habitats rather than replace them, and where practicable, create new habitats of value within the site landscaping proposals. Where habitat creation is required as mitigation, compensation, or enhancement the location and quality will be of key importance. In this regard habitat creation will be focused on areas where the most ecological and ecosystems benefits can be realised in order to comply with the requirement of **NPS EN-1 paragraph 5.4.36** to provide a Biodiversity Management Strategy.

1.5.15.17 Potential effects on ancient woodland will be minimised through the use of trenchless techniques beneath the one area of ancient woodland within the Mona Onshore Development Area (Llanddulas Limestone and Gwrych Castle Wood Site of Special Scientific Interest SSSI) as described in section 3.8 of Volume 3, Chapter 3: Onshore

ecology of the Environmental Statement (Document Reference F3.3) and in accordance with **NPS EN-1 paragraphs 5.4.32 and 5.4.53**.

1.5.15.18 Mitigation for small extents of unavoidable tree loss (hedgerows) includes new hedgerow tree and woodland planting (see section 3.8 and Tables 1.30 to 1.32 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement (Document Reference F3.3) and retained trees and woodland will be protected with buffers (see section 3.8 of the chapter and the Tree and Hedgerow Plan (Document Reference B14) and the enhancement measures set out in the Outline LEMP (Document Reference J22) and the Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7).

1.5.15.19 In order to meet the requirements of **NPS EN-1 paragraph 5.4.44 and 5.4.54**, the measures adopted as part of the Mona Offshore Wind Project as outlined above will be delivered via suitably worded requirements within the draft DCO (Document Reference C1) such as Requirement 7 (landscaping), Requirement 9 (CoCP), Requirement 12 (Outline LEMP) and Requirement 13 European Protected Species Onshore, in particular.

1.5.15.20 With regard to the requirements of NPS EN-3 in relation to onshore ecology, Volume 3, Chapter 3: Onshore ecology of the Environmental Statement (Document Reference F3.3) assesses the effects of the cable connection and its associated infrastructure on the onshore environment as required by **NPS EN-3 paragraph 2.8.68**.

1.5.15.21 The environmental effects of the transmission infrastructure and the Onshore Substation are also assessed cumulatively in section 3.10 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement (Document Reference F3.3) and in Volume 5, Chapter 5.1: Cumulative effects screening matrix, of the Environmental Statement as required by **NPS EN-3 paragraph 2.8.72**. The potential effects with respect to marine and coastal environment are considered in Volume 2, Chapters 2 to 5 of the Environmental Statement (Document References F2.2 – F2.5).

1.5.15.22 As required by **NPS EN-3 2.8.215 and 2.8.227 to 2.8.230** the onshore ecology assessment has considered all relevant research and current guidance on avoidance, reduction and mitigation of potential effects. Installation and decommissioning methods have been designed to minimise onshore ecological effects as set out in section 3.9 and Tables 1.30 to 1.32 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement (Document Reference F3.3), Outline LEMP (Document Reference J22) and Outline CoCP (Document Reference J26). The mechanisms through which overall biodiversity benefit would be achieved by the Mona Offshore Wind Project are described in the Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7).

1.5.15.23 Similarly, in relation to the requirement in **NPS EN-5 paragraph 2.13.23** for onshore connection locations for offshore transmission to seek to minimise environmental impacts, such impacts relating to onshore ecology have been minimised by early consultation to agree the scope of assessments and proposed mitigation as referred to in the Scoping Opinion (Document Reference J.8) and in Table 3.8 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement (Document Reference F3.3), with consultation ongoing through the application preparation stage of the Mona Offshore Wind Project via the EWG, which incorporates NRW, CCBC, DCC, RSPB ARC, the Welsh Government and Woodland Trust.

1.5.15.24 The potential impacts on onshore ecological receptors are considered in section 3.9 of Volume 3, Chapter 3: Onshore ecology of the Environmental Statement (Document Reference F3.3) and measures adopted as part of the Mona Offshore Wind Project

are presented in section 3.8 and Tables 1.30 to 1.32 of the chapter, as well as in the Outline LEMP (Document Reference J.22) and the Outline CoCP (Document Reference J.26). The mechanisms through which overall biodiversity benefit would be achieved by the Mona Offshore Wind Project are described in the Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7).

Other Policy Considerations

1.5.15.25 Table 1.28 below lists other national policy considerations relevant to the onshore ecology assessment.

Table 1.28: Summary of Other National Policy Considerations relevant to the Onshore Ecology Assessment.

Future Wales: The National Plan 2040– Policies relevant to the Onshore Ecology Assessment
Policy 9 – Resilient Ecological Networks and Green Infrastructure
PPW 11 – Paragraphs relevant to the Onshore Ecology Assessment
Integrating Green Infrastructure and Development - Paragraph 6.2.5
Biodiversity and Ecological Networks - Paragraph 6.4.3
Biodiversity and Ecological Networks - Paragraph 6.4.5
Biodiversity and Ecological Networks - Paragraph 6.4.21

1.5.15.26 Table 1.29 below lists other local policy considerations relevant to the Onshore Ecology Assessment.

Table 1.29: Summary of Other Local Policy Considerations relevant to the Onshore Ecology Assessment.

Conwy County Borough Council Local Development Plan – Policies relevant to the Onshore Ecology Assessment
Policy NTE/3 – Biodiversity
Denbighshire County Council Local Development Plan – Policies relevant to the Onshore Ecology Assessment
Policy VOE1 – Key Areas of importance
Policy VOE5 - Conservation of natural resources
Policy VOE10 – Renewable Energy Technologies

1.5.15.27 In order to meet the requirements of **Policy 9 of Future Wales** and **paragraphs 6.2.5, 6.4.3, 6.4.5 and 6.4.21 of PPW11**, the potential effects on internationally, nationally and locally designated sites of conservation importance have been identified in Volume 7, Annex 3.1: Onshore ecology desk study of the Environmental Statement (Document Reference F7.3.1) and assessed in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement (Document Reference F3.3).

1.5.15.28 Consultation has been ongoing throughout the application preparation stage of the Mona Offshore Wind Project via the EWG which incorporates NRW, CCBC, DCC, RSPB, ARC and The Welsh Government and Woodland Trust.

1.5.15.29 The Applicant's approach to biodiversity enhancement is presented in the Outline LEMP (Document Reference J.22) and the Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7). The Applicant has identified several opportunities to improve onshore biodiversity, including hedgerow enhancements and the creation of woodland belts to improve habitat connectivity, in addition to tree planting and the creation of species rich hedgerows and areas of grassland, scrub, ponds and wildflowers to provide habitats of conservation interest. The Applicant will continue to explore these opportunities as the Project's design develops, in collaboration with stakeholders post-consent.

1.5.15.30 The approach outlined above and also complies with **Policy NTE/3 of the Conwy LDP** and **Policies VOE1, VOE5 and VOE10 of the Denbighshire LDP** with regard to the protection and enhancement of biodiversity interests,

Summary

Summary of Effects

1.5.15.31 The potential impacts on onshore ecology associated with the construction, operations and maintenance, and decommissioning phases of the Mona Offshore Wind Project included temporary and permanent habitat loss, habitat disturbance and fragmentation, the impact of pollution caused by accidental spills/contaminant release and the impact of spreading Invasive and Non-native Species.

1.5.15.32 The Mona Offshore Wind Project however incorporates several measures to mitigate potential effects on onshore ecology. These include: the utilisation of trenchless techniques (where possible) during construction of the onshore export cable to avoid direct impacts to areas of woodland, watercourses and sites designated for nature conservation, the reinstatement of habitats (e.g. hedgerows) to be temporarily affected during construction of the Mona Offshore Wind Project using locally sourced native species (where practicable) to minimise habitat loss, disturbance and fragmentation. Such measures are set out in the Outline CoCP (Document Reference J26) and Outline LEMP (Document Reference J22) and include the provision of an Ecological Clerk of Works, tree protection plans and actions to minimise the spread of Invasive and Non-native Species.

1.5.15.33 As stated in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement, following the implementation of measures provided in the Outline CoCP (Document Reference J26) and Outline LEMP (Document Reference J22), no adverse significant effects are likely to occur with respect to onshore ecology during construction, operations and maintenance and decommissioning of the Mona Offshore Wind Project.

1.5.15.34 The Applicant's approach to biodiversity enhancement is presented in the Outline LEMP (Document Reference J22) and the mechanisms through which overall biodiversity benefit will be achieved are described in the Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7). The Mona Offshore Wind Project has identified several opportunities to improve onshore biodiversity, including hedgerow enhancements and the creation of woodland belts to improve habitat connectivity, in addition to tree planting and the creation of species rich hedgerows and areas of grassland, scrub, ponds and wildflowers to provide habitats of

conservation interest. The Applicant will continue to explore these opportunities as the Project's design develops, in collaboration with stakeholders post-consent.

1.5.15.35 Further detail is provided in the Outline LEMP (Document Reference J22), which includes the following measures:

- The creation and future management/monitoring of woodland belts, species rich hedgerows, tree planting, species rich grassland, scrub, ponds and wildflower planting at the Onshore Substation
- Great crested newt mitigation strategy
- The creation of hedgerows within the Mona Onshore Development Area to minimise habitat loss (e.g. temporary and permanent loss of hedgerows), disturbance and fragmentation and enhance connectivity the surrounding area.

1.5.15.36 An assessment of cumulative effects on onshore ecology between the Mona Offshore Wind Project and other plans/projects located within 1 km of the Mona Onshore Development Area and 2 km of the Onshore Substation was also undertaken. As stated in Volume 3, Chapter 3: Onshore ecology of the Environmental Statement, following the implementation of measures provided in the Outline CoCP (Document Reference J26) and Outline LEMP (Document Reference J22), there would be no likely significant cumulative effects with respect to onshore ecology during construction, operation and maintenance and decommissioning of the Mona Offshore Wind Project.

1.5.15.37 It is also considered that there is no potential for significant transboundary effects to occur during the construction, operations and maintenance and decommissioning phase of the Mona Offshore Wind Project upon the interests of other States with respect to onshore ecology.

Policy Compliance

1.5.15.38 In terms of onshore ecology, the Mona Offshore Wind Project has been assessed as required by the NPSs EN-1, EN-3 and EN-5, Future Wales Policy 9 and PPW11 Section 6.4, as well as Policy NTE/3 of the Conwy LDP and Policies VOE5 and VOE10 of the Denbighshire LDP.

1.5.15.39 Subject to the measures proposed as part of the Mona Offshore Wind Project, that assessment has confirmed that no significant effects in relation to onshore ecology are considered likely. Indeed, the measures adopted as part of the Project, in particular those that will deliver biodiversity enhancement, as set out in Outline LEMP (Document Reference J22) and the Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7) would result in minor beneficial effects to onshore ecology.

1.5.15.40 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on onshore ecology, which are not significant in EIA terms.

1.5.16 Onshore and Intertidal Ornithology

1.5.16.1 This topic is assessed in Volume 3 Chapter 4: Onshore and intertidal ornithology of the Environmental Statement (Document Reference F3.4).

1.5.16.2 Table 1.30 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to the onshore and intertidal ornithology assessment. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the

Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.30: Summary of National Policy Statements relevant to the Onshore and intertidal ornithology Assessment.

National Policy Statements – Paragraphs relevant to the Onshore and Intertidal Ornithology Assessment
NPS EN-1
Biodiversity and Geological Conservation – Paragraph 5.4.7
Biodiversity and Geological Conservation – Applicant Assessment – Paragraph 5.4.16 – 5.4.17
Biodiversity and Geological Conservation – Secretary of State Decision Making – Paragraph 5.4.48
Biodiversity and Geological Conservation – Secretary of State Decision Making – Paragraph 5.4.55
NPS EN-3
Offshore Wind – Impacts - Paragraph 2.8.104
Offshore Wind – Birds - Paragraph 2.8.143

1.5.16.3 Assessment of the potential effects of the Mona Offshore Wind Project relating to onshore and intertidal ornithology is reported section 1.8 of Volume 3 Chapter 4: Onshore and intertidal ornithology of the Environmental Statement (Document Reference F3.4) and measures adopted as part of the Mona Offshore Wind Project, including primary and tertiary mitigation are discussed in section 1.7 of the chapter. As required by **NPS EN-1 paragraphs 5.4.7, 5.4.17 and 5.4.48** effects are considered on internationally, nationally and locally designated sites, including SSSIs.

1.5.16.4 Internationally designated ornithological sites are also considered in: Volume 7, Annex 4.1: Onshore ornithology wintering and migratory birds technical report of the Environmental Statement (Document Reference F7.4.1), Volume 7, Annex 4.2: Intertidal ornithology – wintering and migratory birds technical report (Document Reference F7.4.2) and Volume 7, Annex 4.3: Onshore ornithology – breeding birds technical report (Document Reference F7.4.3) of the Environmental Statement. Separate reports containing the Information to Support and Appropriate Assessment (ISAA) have also been submitted as part of the DCO application (Document References E1.1 – E1.3).

1.5.16.5 In line with **NPS EN-1, paragraph 5.4.16 and 5.4.55**, all species afforded extra protections under the Conservation of Habitats and Species Regulations 2017 (as amended) (formerly the EU Birds Directive Annex I), Schedule 1 of the Wildlife and Countryside Act, and Section 7 species of the Environment (Wales) Act 2016, are considered in Volume 7, Annex 4.1: Onshore ornithology – wintering and migratory birds technical report; Volume 7, Annex 4.2: Intertidal ornithology – wintering and migratory birds technical report; Volume 7, Annex 4.3: onshore ornithology – breeding birds technical report of the Environmental Statement (Document References F7.4.1 - F7.4.3).

1.5.16.6 In accordance with **NPS EN-3, paragraph 2.8.104**, throughout the application preparation stage of the Mona Offshore Wind Project consultations with relevant statutory and non-statutory stakeholders have been carried out, in particular, via the Evidence Plan Process EWGs. Baseline survey methods were discussed with NRW and the RSPB as required by **NPS EN-3, paragraph 2.8.143** (see Table 1.7 of Volume 3 Chapter 4: Onshore and intertidal ornithology of the Environmental Statement (Document Reference F3.4)).

Other Policy Considerations

1.5.16.7 Table 1.31 below lists other national policy considerations relevant to the onshore and intertidal ornithology assessment.

Table 1.31: Summary of Other National Policy Considerations relevant to the Onshore and Intertidal Ornithology Assessment.

PPW11 – Paragraphs relevant to the Onshore and Intertidal Ornithology Assessment
Biodiversity and Ecological Networks - Paragraph 6.4.3
Biodiversity and Ecological Networks - Paragraph 6.4.22

1.5.16.8 Table 1.32 below lists other local policy considerations relevant to the onshore and intertidal ornithology assessment.

Table 1.32: Summary of Other Local Policy Considerations relevant to the Onshore and Intertidal Ornithology Assessment.

Conwy County Borough Council Local Development Plan - Policies relevant to the Onshore and Intertidal Ornithology Assessment
Policy NTE/3 – Biodiversity
Denbighshire County Council Local Development Plan - Policies relevant to the Onshore and Intertidal Ornithology Assessment
Policy VOE5 - Conservation of Natural Resources
Policy VOE10 - Renewable energy technologies

1.5.16.9 With regard to the requirements of **Paragraphs 6.4.3 and 6.4.22 of PPW11** insofar as they relate to onshore and intertidal ornithology, the assessment reported in Volume 3 Chapter 4: Onshore and intertidal ornithology of the Environmental Statement (Document Reference F3.4) considers all bird species afforded extra protections under the Conservation of Habitats and Species Act 2017 (as amended) (formerly the EU Birds Directive Annex I), Schedule 1 of the Wildlife and Countryside Act, and Section 7 species of the Environment (Wales) Act 2016. As set out in Volume 7, Annex 4.1: Onshore ornithology - wintering and migratory birds technical report; Volume 7, Annex 4.2: Intertidal ornithology – wintering and migratory birds technical report; Volume 7, Annex 4.3: onshore ornithology - breeding birds technical report of the Environmental Statement, with relevant data gathered through ornithological surveys including wintering and migratory bird surveys, intertidal waterbird surveys and breeding bird surveys.

1.5.16.10 In accordance with **Policy NTE/3 of the Conwy LDP** and **Policy VOE5** and **VOE10 of the Denbighshire LDP**, the ornithological assessment work as set out in Volume

7, Annex 4.1: Onshore ornithology - wintering and migratory birds technical report; Volume 7, Annex 4.2: Intertidal ornithology – wintering and migratory birds technical report; Volume 7, and Annex 4.3: Onshore ornithology - breeding birds technical report of the Environmental Statement (Document References F7.4.1-F7.4.3) and as reported in Volume 3 Chapter 4: Onshore and intertidal ornithology of the Environmental Statement (Document Reference F3.4) consider nature conservation issues relating to ornithology and include any mitigation measures relevant to onshore and intertidal ornithology as necessary (see section 1.7 of the chapter).

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1.5.16.11 Information on onshore and intertidal ornithology was collected through review of available literature, other assessments, UK statutory guidance, detailed analysis of the data collected during site-specific surveys, and consultation with relevant stakeholders and the assessments were undertaken in accordance with the requirements of NPS EN-1, NPS EN-3, Section 6.4 of PPW11, Policy NTE/3 of the Conwy LDP and Policies VOE5 and VOE10 of the Denbighshire LDP.

1.5.16.12 The measures adopted as part of the Mona Offshore Wind Project, such as trenchless installation at the Mona Landfall and the measures set out in the Outline CoCP (Document Reference J26) and Outline LEMP (Document Reference J22), including the Bird Protection Plan have minimised the potential effects of the Mona Offshore Wind Project in relation to onshore and intertidal ornithology such that they are all considered to be not significant in EIA terms.

1.5.16.13 Temporary habitat loss is considered to be of minor adverse significance to the seabird and waterbird species in the Mona Onshore Development Area due to the short-term nature of the effect during the construction and decommissioning phases of the Mona Offshore Wind Project. Notably, no significant effects of permanent habitat loss are predicted on breeding birds within the Mona Onshore Development Area due of the absence of overlap of breeding territories with the Onshore Substation, which is the only place where permanent habitat loss is expected to take place, albeit that this will be at a small scale and will only affect habitats of low ornithological value.

1.5.16.14 In EIA terms habitat disturbance is considered to be of minor adverse significance to the ornithological receptors in the Mona Onshore Development Area, again, due to the short-term nature of the effect during the construction and decommissioning phases of the Mona Offshore Wind Project.

1.5.16.15 Effects from pollution caused by accidental spills/contaminant release are also considered to be of minor adverse significance on ornithological receptors and, similarly, spread of INNS is only considered to be of minor adverse, which is not significant in EIA terms.

1.5.16.16 Finally, in terms of effects of the Mona Offshore Wind Project alone, there is no change in relation to habitat fragmentation and species isolation on birds.

1.5.16.17 Cumulative effects between the Mona Offshore Wind Project and other projects/plans located within 1 km of the Mona Onshore Development Area were assessed with respect to onshore and intertidal ornithology. This assessment confirmed that effects on onshore and intertidal ornithology would also be negligible to minor adverse, which are not significant in EIA terms.

1.5.16.18 It is considered that there is no potential for significant transboundary effects to occur on the interests of other EEA States as a result of the Mona Offshore Wind Project with respect to onshore and intertidal ornithology.

Policy Compliance

1.5.16.19 In terms of onshore and intertidal ornithology, the Mona Offshore Wind Project has been assessed as required by the NPS EN-1, NPS EN-3, PPW and the Conwy and Denbighshire LDPs.

1.5.16.20 Subject to the measures proposed as part of the Mona Offshore Wind Project, that assessment has confirmed that no significant effects in relation to onshore and intertidal ornithology are considered likely.

1.5.16.21 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on onshore and intertidal ornithology, which are not significant in EIA terms.

1.5.17 Historic Environment

1.5.17.1 This topic is assessed in Volume 3, Chapter 5: Historic environment of the Environmental Statement (Document Reference F3.5).

1.5.17.2 Table 1.33 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to the historic environment assessment. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.33: Summary of National Policy Statements relevant to the Historic Environment Assessment.

National Policy Statements – Paragraphs relevant to the Historic Environment Assessment
NPS EN-1
Historic Environment – Applicant Assessment – Paragraph 5.9.9 – 5.9.12
Historic Environment – Secretary of State Decision Making – Paragraph 5.9.22

1.5.17.3 The assessment of likely impacts is presented in section 5.10 Volume 3, Chapter 5: Historic Environment of the Environmental Statement (Document Reference F3.5). As required by **NPS EN-1 paragraph 5.9.9** it includes consideration of heritage assets below, at and above the surface of the ground and consideration of potential impact on the wider historic landscape including settings assessments for both the onshore and offshore infrastructure. An assessment of likely cumulative impacts is presented in section 5.12 of the chapter and that assessment includes references to historic landscape character assessments as appropriate.

1.5.17.4 In order to comply with **NPS EN-1 paragraph 5.9.10** the relevant Historic Environment Records were consulted as part of the assessment and a description of baseline heritage assets is provided in section 5.6 of Volume 3, Chapter 5: Historic Environment of the Environmental Statement (Document Reference F3.5) and in Volume 7, Annex

5.1: Desk Based Assessment of the Environmental Statement (Document Reference F7.5.1). Additional information regarding the settings of certain heritage assets and the contribution that the setting makes to their significance is provided in Volume 7, Annex 5.6: Settings assessment (onshore infrastructure) of the Environmental Statement (Document Reference F7.5.6) and Volume 7, Annex 5.7: Settings assessment (offshore infrastructure) of the Environmental Statement (Document Reference F7.5.7).

1.5.17.5 The desk-based assessment is presented in Volume 7, Annex 5.1 of the Environmental Statement (Document F7.5.1) and field evaluation has also been undertaken in accordance with **NPS EN-1 paragraph 5.9.1**. The results are presented in Volume 7, Annex 5.3: Onshore geophysical survey report (Document Reference F7.5.3), Volume 7, Annex 5.4: Intertidal survey report (Document Reference F7.5.4) and Volume 7, Annex 5.5; Trial trenching report (Document Reference F7.5.5) of the Environmental Statement.

1.5.17.6 Within the assessment presented in section 5.10 of Volume 3, Chapter 5: Historic Environment of the Environmental Statement (Document Reference F3.5), reference is made to the representative visualisations that have been used in the undertaking of the assessments where the setting of a heritage asset may be affected that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood as required by **NPS EN-1 paragraph 5.9.12** .

1.5.17.7 The impact of the Mona Offshore Wind Project on the significance of heritage assets is clearly assessed within sections 5.10 and 5.12 of Volume 3, Chapter 5: Historic Environment of the Environmental Statement (Document Reference F3.5) and, also as required by **NPS EN-1 paragraph 5.9.12** the assessments presented within section 5.10 and section 5.12 of the chapter also include consideration of potential noise, vibration, light and indirect impacts.

1.5.17.8 The approach to the historic environment assessment, therefore, as required by **NPS EN-1 paragraph 5.9.22**, will allow the decision-maker to identify and assess the particular significance of any heritage asset that may be affected by the Mona Offshore Wind Project.

Other Policy Considerations

1.5.17.9 Table 1.34 below lists other national policy considerations relevant to the historic environment assessment.

Table 1.34: Summary of Other National Policy Considerations relevant to the Historic Environment Assessment.

PPW11 - Paragraphs relevant to the Historic Environment Assessment
Paragraph 6.1.7 – Distinctive and Natural Places
Technical Advice Notes
TAN 24: The Historic Environment

1.5.17.10 Table 1.35 below lists other local policy considerations relevant to the historic environment assessment. These include policies from policies from the Conwy County Borough Council Local Development Plan and Denbighshire County Council Local Development Plan.

Table 1.35: Summary of Other Local Policy Considerations relevant to the Historic Environment Assessment.

Conwy County Borough Council Local Development Plan - Policies relevant to the Historic Environment Assessment
Policy CTH/1 – Cultural Heritage
Policy CTH/2 - Development affecting heritage assets
Denbighshire County Council Local Development Plan - Policies relevant to the Historic Environment Assessment
Policy VOE1 – Key areas of protection
Policy VOE10: Renewable energy technologies

1.5.17.11 The approach to the assessment of potential effects on heritage assets within Volume 3, Chapter 5: Historic environment of the Environmental Statement (Document Reference F3.5) as set out above in relation to the requirements of NPS EN-1 is also considered to comply with the requirements of **PPW11 paragraph 6.1.7, TAN24, Policies CTH/1 and CTH/2 of the Conwy LDP** and **Policies VOE1 and VOE10 of the Denbighshire LDP** in terms of identifying and seeking to preserve such assets.

Summary

Summary of Effects

1.5.17.12 Information on the historic environment was collected through desk-based review of available data, along with site visits and an ongoing programme of archaeological fieldwork. Consultation was undertaken with relevant stakeholders to ensure that the data sources examined were appropriate and that the archaeological fieldwork was undertaken in accordance with best practice and the subsequent assessments were undertaken in accordance with the requirements of NPS EN-1 as set out above.

1.5.17.13 The Mona Onshore Cable Corridor, Mona 400 kV Grid Connection Cable and the construction site accesses have been designed to minimise land take and to avoid, where possible, effects on known buried archaeological sites and features.

1.5.17.14 A combination of desk-based research, targeted site visits and a phased programme of fieldwork has informed the site selection and design refinement process to ensure that direct physical impacts on designated historic assets and on buried archaeological sites and features have been avoided wherever possible, or otherwise minimised.

1.5.17.15 The western part of the Mona Onshore Development Area passes through a Grade II* Registered Park and Garden of Special Historic Interest at Gwrych Castle, the northern boundary of which comprises a Grade II listed stone wall. The cables would be installed beneath the boundary wall and also beneath a historic tree belt within the park and garden using trenchless construction techniques which avoid direct physical impacts to these historic assets.

1.5.17.16 Areas of landscape planting and a landscape scheme for the Onshore Substation have been identified in the Outline LEMP (Document Reference J22). These measures would help to avoid or reduce any potential harm to the significance of designated historic assets as a result of change within their setting and would also eliminate or reduce harm to the character of the historic landscape.

1.5.17.17 The implementation of the Outline Construction Noise and Vibration Management Plan (Document Reference J26.3) would also help to avoid or reduce any potential harm to the significance of designated historic assets as a result of change within their setting during construction.

1.5.17.18 Operating noise limits for the Onshore Substation will be agreed with the relevant authority to help avoid or reduce any potential harm to the significance of designated historic assets as a result of change within their setting during the operation of the Onshore Substation. This is secured through a Requirement in the DCO.

1.5.17.19 The historic environment assessment has concluded that the only potential significant adverse effects arising from the Mona Offshore Wind Project during the construction, operations and maintenance or decommissioning phases would be in relation to the loss of, or harm to, above ground historic assets during construction and potential effects arising from the construction and operations and maintenance of the Onshore Substation within the setting of the Grade II listed Pentre Meredydd. However, construction effects would be temporary and the landscape planting scheme proposed around the Onshore Substation site as set out the Outline LEMP (Document Reference J22) would over time, reduce this effect such that it would no longer be significant.

1.5.17.20 The only significant adverse cumulative effect which has been identified with regard to the historic environment is also one arising from the construction and operations and maintenance of the Onshore Substation within the setting of the Grade II listed Pentre Meredydd. Again, however, construction effects would be temporary and the landscape planting scheme proposed around the Onshore Substation site as set out the Outline LEMP (Document Reference J22) would over time, reduce this effect such that it would no longer be significant.

1.5.17.21 Whilst a potentially significant cumulative effect has been noted in the assessment of the Mona Array Area on the setting of terrestrial designated historic assets, it is considered that the Mona Offshore Wind Project's contribution to the effect is minor adverse, which is not significant in EIA terms. Rather, it is the contribution of other offshore wind projects, such as the consented Awel y Môr project, the Environmental Statement for which concluded a moderate adverse effect for Awel y Môr alone in respect of one of the relevant historic assets. Accordingly, due to this and Awel y Môr's closer proximity to the shore, it is considered that Awel y Môr provides the greatest contribution to the assessed cumulative significant effects.

1.5.17.22 No potential adverse transboundary effects on historic environment resources have been identified as arising from the Mona Offshore Wind Project.

Policy Compliance

1.5.17.23 In terms of the historic environment, the Mona Offshore Wind Project has been assessed as required by the NPS EN-1 and PPW11.

1.5.17.24 The landscape scheme for the Onshore Substation in the Outline LEMP (Document Reference J22), the Outline Construction Noise and Vibration Management Plan (Document Reference J26.3) and the Operational Noise Management Plan included as part of the Mona Offshore Wind Project have resulted in the historic environment assessment concluding that there are only two potentially significant adverse effects arising from the Mona Offshore Wind Project alone.

1.5.17.25 These relate to effects during construction and effects during operations and maintenance within the setting of the Grade II listed building Pentre Meredydd that have the potential to affect the significance of that historic asset. However, the

construction effects would be temporary and the landscape planting scheme proposed around the Onshore Substation site as set out the Outline LEMP (Document Reference J22) would over time, reduce the operations and maintenance effect such that it would no longer be significant.

1.5.17.26 The assessment has been made on the basis of the MDS, with a very precautionary approach taken for both receptor sensitivity and impact magnitude and as the Outline LEMP (Document Reference J22) evolves into a detailed LEMP it will take account of further baseline information where possible and further consider detailed design elements of the Mona Onshore Substation in order to achieve reduced significance of effects.

1.5.17.27 Notwithstanding the potential effects above, in accordance with NPS EN-1 paragraph 3.3.63, the presumption in favour of CNS infrastructure is not affected. Accordingly, the Mona Offshore Wind Project, subject to the mitigation proposed, accords with the requirements of NPS EN-1, PPW11 and the relevant policies of the Denbighshire and Conwy LDPs.

1.5.18 Landscape and Visual Resources

1.5.18.1 This topic is assessed in Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement (Document Reference F3.6).

1.5.18.2 Table 1.36 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the landscape and visual resources assessment. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.36: Summary of National Policy Statements relevant to the Landscape and Visual Resources Assessment.

National Policy Statements – Paragraphs relevant to the Landscape and Visual Resources Assessment
NPS EN-1
Biodiversity and Geological Conservation – Applicant Assessment – Paragraphs 5.4.14 and 5.4.15
Biodiversity and Geological Conservation – Applicant Assessment – Paragraph 5.4.32
Biodiversity and Geological Conservation – Applicant Assessment – Paragraph 5.4.35
Landscape and Visual – Paragraphs 5.10.5 and 5.10.6
Landscape and Visual – Applicant Assessment - Paragraphs 5.10.16 and 5.10.17
Landscape and Visual – Applicant Assessment - Paragraphs 5.10.19 – 5.10.21
Landscape and Visual – Applicant Assessment - Paragraph 5.10.24
Landscape and Visual – Applicant Assessment - Paragraphs 5.10.26 – 5.10.28
Land Use, Including Open Space, Green Infrastructure, and Green Belt- Mitigation - Paragraph 5.11.27

National Policy Statements – Paragraphs relevant to the Landscape and Visual Resources Assessment
EN-3
National Designations – Paragraph 2.3.6
Consideration of good design for energy infrastructure – Paragraph 2.5.2
Offshore wind – Seascape and Visual effects - Paragraph 2.8.210
Offshore wind – Seascape and Visual effects - Paragraph 2.8.212
EN-5
Applicant Assessment – Landscape and Visual Impact – Paragraphs 2.9.18 and 2.9.19
Mitigation – Landscape and Visual – Paragraphs 2.10.5 and 2.10.6

1.5.18.3 Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement (Document Reference F3.6) reports the landscape and visual impact assessment undertaken for the Mona Offshore Wind Project in accordance with **NPS EN-1 paragraph 5.10.16**. This takes account of relevant policies in the Conwy and Denbighshire LDPs as set out below in accordance with **NPS EN-1 paragraph 5.10.17**.

1.5.18.4 The landscape assessment of the Mona Offshore Wind Project has been prepared in line with the Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3) and other guidance documents used in the landscape and visual assessment are set out in Table 6.8 and section 6.4.1 of Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement (Document Reference F3.6). They are explained in detail within Volume 7, Annex 6.4: Landscape, seascape and visual resources impact assessment methodology, of the Environmental Statement (Document Reference F7.6.4). Relevant planning policy used to inform the assessment is outlined in Volume 7, Annex 6.1: Landscape and visual resources planning policy context, of the Environmental Statement (Document Reference F7.6.1).

1.5.18.5 The assessment of the effects of the Mona Offshore Wind Project on landscape components, character, views and visual amenity (including light pollution) during construction, operations and maintenance, and decommissioning is set out in sections 6.9, 6.10 and 6.11 of Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement (Document Reference F3.6) as required by **NPS EN-1 paragraph 5.10.21**.

1.5.18.6 The Mona Onshore Development Area does not include any areas of nationally designated landscapes. The Mona onshore substation will be visible from the Clwydian Range and Dee Valley NL therefore the indirect effects on it are considered specifically in the assessment in order to comply with **NPS EN-1 paragraph 5.10.20 and NPS EN-3 paragraph 2.3.6**. Gwyrch Castle Registered Park and Garden (RPaG) is crossed using both trenched and trenchless techniques, but the effects are not judged to be significant. The work at the Onshore Substation site will not be visible from the Special

Landscape Areas (SLA). However, the western part of the Onshore Cable Corridor passes through the Rhyd y Foel to Abergele SLA. The works will not have a significant effect on the SLA during the construction phase.

1.5.18.7 The effects on the character of the landscape, including the features, elements and characteristics that make up that character are considered in section 6.10 of Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement (Document Reference F3.6) and the landscape and visual impacts are summarised in section 6.17 of the chapter.

1.5.18.8 The Onshore Substation is 7.93 km from the coast and is located on a platform that is cut into the topography and uses land-modelling and woodland to help screen close views. Visualisations of the Onshore Substation have been prepared from representative viewpoints and are presented in Volume 7, Annex 6.5: Landscape visualisations of the Environmental Statement (Document Reference F7.6.5).

1.5.18.9 Specific consideration has been given to the siting and design of the substation at early stages within the design process to mitigate adverse effects and to enhance the landscape in accordance with **NPS EN-1 paragraph 5.10.19 and NPS EN-3 paragraph 2.5.2**. Siting and design considerations took full account of the Horlock Rules and Schedule 9 of the Electricity Act 1989 as required by **NPS EN-5 paragraphs 2.9.18 and 2.9.19**.

1.5.18.10 A tree survey and Arboricultural Impact Assessment (AIA) has been undertaken for the Mona Onshore Development Area and is presented in Volume 7, Annex 6.6: Tree survey and arboricultural impact assessment of the Environmental Statement (Document Reference F7.6.6). Ancient Woodland, veteran trees and their root protection zones (RPZ) have been avoided in accordance with **NPS EN-1 paragraphs 5.4.14, 5.4.15 and 5.11.27**. Tree RPZs will be clearly marked and fenced off during construction. The operation and maintenance of the Onshore Substation and cable corridor should not necessitate the removal of trees or encroachment on any tree RPZs. In the unlikely event that work near a retained tree is required, a method statement for that work would be agreed with the relevant Tree Officer. An Outline Arboricultural Method Statement is provided as an appendix to the Outline CoCP (Document Reference J26.18).

1.5.18.11 Whilst **NPS EN-1 paragraph 5.10.5** recognises that virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, the measures adopted as part of the Mona Offshore Wind Project relating to landscape and visual effects, seek to fully mitigate any effects as required by **NPS EN-1 paragraphs 5.4.32 and 5.4.35**.

1.5.18.12 The Outline LEMP (Document Reference J22) has been carefully designed with input from landscape, arboriculture, ecology, hydrology and the historic environment disciplines as required by **NPS EN-1 paragraph 5.10.6** and opportunities have been taken in it to both mitigate and enhance the existing landscape, where engineering and landowner requirements have allowed in accordance with **NPS EN-1 paragraphs 5.10.24 and 5.10.26 to 5.10.28** as well as having regard to the Horlock Rules as required by **NPS EN-5 paragraphs 2.10.5 and 2.10.6**. This includes areas of habitat creation that will provide biodiversity enhancement. A Biodiversity Benefit and Green Infrastructure Statement has been prepared to set out these measures (Document Reference J7).

1.5.18.13 The Design Commission for Wales (DCfW), Denbighshire County Council, NRW, Cadw and The Woodland Trust were consulted on the design proposed in the Outline LEMP (Document Reference J22) with details of the discussion included in Table 6.7

of Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement (Document Reference F3.6).

1.5.18.14 The landscape mitigation and enhancement set out in the Outline LEMP (Document Reference J22) includes the creation of woodland and restoration of historic field boundaries, as well as the creation of wildflower meadows. The restoration of the field boundaries will create connectivity and restore isolated trees to their appropriate/relevant setting. The plants used in this creation/restoration will be obtained from a local nursery that grows locally gathered seed.

Other Policy Considerations

1.5.18.15 Table 1.37 below lists other national policy considerations relevant to the landscape and visual resources assessment.

Table 1.37: Summary of Other National Policy Considerations relevant to the Landscape and Visual Resources Assessment.

PPW 11 – Paragraphs relevant to the Landscape and Visual Resources Assessment
Landscape - Paragraph 6.3.5 – 6.3.11
Landscape - Paragraph 6.3.20

1.5.18.16 In terms of the principles set out in **PPW 11 paragraphs 6.3.5 to 6.3.11** seeking to maximise environmental protection and limiting impact on National Parks and NLs, whilst the SLVIA study area for both onshore and offshore elements of the Mona Offshore Wind Project include parts of internationally and/or nationally designated landscapes, no elements of the Mona Offshore Wind Project lie within internationally or nationally designated landscapes. The onshore transmission assets are assessed in sections 6.10.1 and 6.10.2 of Volume 3, Chapter 6: Landscape and Visual Resources of the Environmental Statement (Document Reference F3.6).

1.5.18.17 That assessment recognises that parts of the Mona Onshore Substation will be visible from the Clwydian Range and Dee Valley NL. A detailed study of the effects of the Mona Offshore Wind Project on the special qualities of the NL has been undertaken and is included in Volume 6, Annex 8.5: Internationally and nationally designated landscape study of the Environmental Statement (Document Reference F6.8.5).

1.5.18.18 In accordance with **PPW11 paragraph 6.3.20**, The LANDMAP Aspect Areas relevant to the onshore elements of the Mona Offshore Wind Project are identified and reviewed in Volume 6, Annex 8.2: Seascape and landscape character baseline technical report, of the Environmental Statement (Document Reference F6.8.2). The effects on the Aspect Areas are assessed in section 6.10 of Volume 3, Chapter 6: Landscape and Visual Resources of the Environmental Statement (Document Reference F3.6).

1.5.18.19 Table 1.38 below lists other local policy considerations relevant to the landscape and visual resources assessment.

Table 1.38: Summary of Other Local Policy Considerations relevant to the Landscape and Visual Resources Assessment.

Conwy County Borough Council Local Development Plan – Policies relevant to the Landscape and Visual Resources Assessment
Policy NTE/1 – The natural environment
Policy NTE/4 – The landscape and protecting Special Landscape Areas
Policy NTE/5 - The Coastal Zone: The policy seeks to control development along coastlines.
Denbighshire County Council Local Development Plan – Policies relevant to the Landscape and Visual Resources Assessment
Policy RD1 - Sustainable development and good standard design
Policy VOE1 – Key Areas of importance
Policy VOE2 – AONB (now termed a NL) and AOB
Policy VOE10 – Renewable energy technologies

1.5.18.20 As set out in relation to the NPSs and PPW11 above, the assessment of the effects of the Mona Offshore Wind Project on landscape components, character, views and visual amenity is set out in sections 6.10 and 6.11 in accordance with **Policy NTE/1 of the Conwy LDP and Policies VOE1, VOE2 and VOE10 of the Denbighshire LDP** of Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement (Document Reference F3.6). No elements of the Mona Offshore Wind Project lie within internationally or nationally designated landscapes.

1.5.18.21 Specifically in relation to **Policy VOE2 of the Denbighshire LDP**, as parts of the Mona Onshore Substation will be visible from the Clwydian Range and Dee Valley NL, a detailed study of the effects of the Mona Offshore Wind Project on the special qualities of the NL has been undertaken and is included in Volume 6, Annex 8.5: Internationally and nationally designated landscape study of the Environmental Statement (Document Reference F6.8.5). The direct visual impact of the Onshore Substation is assessed at section 6.11 Volume 3, Chapter 6: Landscape and visual resources of the Environmental Statement (Document Reference F3.6) with photomontages at winter Year 1 and summer Year 15 included in Volume 7, Annex 6.5: Landscape visualisations of the Environmental Statement (Document Reference F7.6.5).

1.5.18.22 The assessment has informed landscape measures adopted as part of the Mona Offshore Wind Project and, in particular, in respect of the Onshore Substation the proposed mitigation is set out in the Outline LEMP (Document Reference J22) such that landscape character will be protected in accordance with **Policy NTE/1 of the Conwy LDP** and **Policy RD1 of the Denbighshire LDP**.

1.5.18.23 With regard to **Policy NTE/5 of the Conwy LDP**, the effects of the works within the Mona Onshore Development Area on the coastal area will generally be temporary in nature with no above ground structures proposed. The effects on the coastal area are considered in sections 6.10 to 6.11 of Volume 3, Chapter 6: Landscape and Visual Resources of the Environmental Statement (Document Reference F3.6).

Summary

Summary of Effects

1.5.18.24 Landscape measures adopted as part of the Mona Offshore Wind Project include the following:

- Burying the onshore cables completely for the entire length of the Mona Onshore Cable Corridor
- No overhead lines to be installed
- Protection of exiting vegetation and replacement of hedgerows and/or trees removed and additional mitigation planting in accordance with the Outline CoCP (Document Reference J26)
- The Outline LEMP (Document Reference J22) includes the retention/protection of existing vegetation and landscape planting to reduce landscape and visual impacts
- The Outline Arboricultural Method Statement (Document Reference J26.18) includes methods to protect trees during construction
- The Outline Public Rights of Way Management Strategy (Document Reference J26.17) identifies measures to avoid severance and maintain access to affected Public Rights of Way so as to ensure these are reinstated as soon as reasonably practicable.

1.5.18.25 The landscape and visual assessment has considered the impact of the onshore elements of the Mona Offshore Wind Project on landscape character, on publicly accessible views and potential daytime and night-time impacts upon landscape and visual resources associated with the construction, operations and maintenance and decommissioning phases of the onshore elements of the Project.

1.5.18.26 The special qualities of the Clwydian Range and Dee Valley NL will not be significantly affected and the reasons for their designation will not be compromised. In addition, effects on Gwyrch Castle RPaG are not judged to be significant. During construction, operations and maintenance and the decommissioning phases there will be no significant effects on the SLAs.

1.5.18.27 There could be temporary effects on LANDMAP Aspect Areas directly affected by the construction works at the landfall and along the Mona Onshore Cable Corridor and on views gained by people using the beach and Public Rights of Way as a result of those construction activities.

1.5.18.28 There could also be temporary effects on LANDMAP Aspect Areas directly and on views gained by people using the Public Rights of Way network near the Onshore Substation site during construction, operations and maintenance and decommissioning. Effects during operations and maintenance will lessen as the landscape mitigation establishes and they would only be local in extent, arising due to the change in character of agricultural fields to energy infrastructure, with effects on adjacent and more distant Aspect Areas not being significant.

1.5.18.29 People using the Offa's Dyke National Trail and the Wales Coast Path will not experience significant visual effects from the development of the Mona onshore transmission assets, due to distance, and/or intervening vegetation and structures. Potentially significant impacts may arise for a few, visual receptors in close proximity during the construction, operations and maintenance, and decommissioning phases of

the development. Walkers and cyclists using the local road south of the Onshore Substation at the base of Cefn Meiriadog have the potential to experience significant visual effects, from the change in views, due to the development of the Onshore Substation

1.5.18.30 By Year 15 it is predicted that there will be no significant permanent visual effects because the landscape proposals included in the Outline LEMP (Document Reference J22) will have become established.

1.5.18.31 No significant landscape effects are predicted on the Clwydian Range and Dee Valley National Landscape special qualities or on the two Special Landscape Areas assessed.

1.5.18.32 In terms of cumulative effects none are considered to be significant in relation to landscape and visual receptors and there is considered to be no potential for significant transboundary effects to occur.

Policy Compliance

1.5.18.33 The landscape and visual assessments have been undertaken in accordance with the requirements of NPS EN-1, NPS EN-3 and NPS EN-5, as set out above.

1.5.18.34 The majority of landscape and visual effects as a result of the onshore elements of the Mona Offshore Project are considered not significant.

1.5.18.35 Whilst some effects arising from the onshore elements of the Mona Offshore Wind Project are considered to be potentially significant, these effects are temporary during construction (and decommissioning) and no significant permanent visual effects are predicted by Year 15 once the Project's landscape proposals, as set out in the Outline LEMP (Document Reference J22), have become established.

1.5.18.36 It is also noteworthy that no significant landscape effects are predicted on the Clwydian Range and Dee Valley National Landscape special qualities or on the two Special Landscape Areas assessed.

1.5.18.37 Given the temporary nature of the potential effects identified above, it is considered that the Mona Offshore Wind Project, subject to the mitigation proposed, accords with the requirements of NPS EN-1, NPS EN-3 and NPS EN-5 as well as PPW11 and the relevant policies of the Denbighshire and Conwy LDPs.

1.5.18.38 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on landscape and visual resources, which are not significant in EIA terms.

1.5.19 Land Use and Recreation

1.5.19.1 This topic is assessed in Volume 3, Chapter 7: Land use and recreation of the Environmental Statement (Document Reference F3.7)

1.5.19.2 Table 1.39 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to the land use and recreation assessment. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.39: Summary of National Policy Statements relevant to the Land Use and Recreation Assessment.

National Policy Statements – Paragraphs relevant to the Land Use and Recreation Assessment
NPS EN-1
Land Use, Including Open Space, Green Infrastructure, and Green Belt – Applicant Assessment – Paragraph 5.11.8
Land Use, Including Open Space, Green Infrastructure, and Green Belt – Applicant Assessment – Paragraph 5.11.12 – 5.11.14
Land Use, Including Open Space, Green Infrastructure, and Green Belt – Mitigation – Paragraph 5.11.30
Land Use, Including Open Space, Green Infrastructure, and Green Belt – Mitigation – Paragraph 5.11.32
Land Use, Including Open Space, Green Infrastructure, and Green Belt – Secretary of State Decision Making – Paragraph 5.11.34 and 5.11.35

1.5.19.3 Existing and proposed land uses located within or near the Mona Onshore Development Area are identified in Volume 7, Annex 7.3: Recreational resources plan technical report (Document Reference F7.7.3) and likely significant effects assessed in section 7.8 of Volume 3, Chapter 7: Land use and recreation of the Environmental Statement (Document Reference F3.7).

1.5.19.4 Consultation has taken place during the development of the Mona Offshore Wind Project between the Applicant and Local Authorities, in particular to identify relevant proposed developments for cumulative assessment.

1.5.19.5 Volume 7, Annex 7.1: Published soil and Agricultural Land Classification data technical report and Volume 7, Annex 7.3: Published recreational resources plan technical report of the Environmental Statement as required by **NPS EN-1 paragraph 5.11.8**.

1.5.19.6 The quality of agricultural land within the Mona Onshore Development Area is identified in Volume 7, Annex 7.1: Published soil and Agricultural Land Classification data technical report (Document Reference F7.7.1) and Volume 7, Annex 7.2: Soil survey data technical report of the Environmental Statement (Document Reference F7.7.2). In accordance with **NPS EN-1 paragraph 5.11.12,** the Mona Offshore Wind Project has sought to minimise impacts on best and most versatile agricultural land, as well as minimising impacts on soil health as required by **NPS EN-1 paragraph 5.11.13 and 5.11.34.** An assessment on the effects on agricultural land is included in section 7.8 of Volume 3, Chapter 7: Land use and recreation of the Environmental Statement (Document Reference F3.7).

1.5.19.7 With regard to soil management, the application also includes an Outline Soil Management Plan (Document Reference J26.8), which forms part of the wider Outline CoCP (Document Reference J26) to be submitted with the DCO application, as encouraged by **NPS EN-1 paragraph 5.11.14**.

1.5.19.8 Measures adopted as part of the Mona Offshore Wind Project to mitigate impacts on recreational resources, including Public Rights of Way, National Trails, and other rights of access within the land use and recreation study area are considered in section 7.7 of Volume 3, Chapter 7 Land use and recreation of the Environmental Statement (Document Reference F3.7). This includes consideration of the implementation of measures set out in the Outline Public Rights of Way Management Strategy

(Document Reference J.26.17) such that the requirements of **NPS EN-1 paragraphs 5.11.30, 5.11.32 and 5.11.35** are met.

Other Policy Considerations

1.5.19.9 Table 1.40 below lists other national policy considerations relevant to the land use and recreation assessment.

Table 1.40: Summary of Other National Policy Considerations relevant to the Land Use and Recreation Assessment.

PPW11 – Paragraphs relevant to the Land Use and Recreation Assessment
Best and Most Versatile Agricultural Land – Paragraphs 3.58 and 3.59
Biodiversity and Ecological Networks – Paragraph 6.4.3

1.5.19.10 Table 1.41 below lists other local policy considerations relevant to the land use and recreation assessment.

Table 1.41: Summary of Other Local Policy Considerations relevant to the Land Use and Recreation Assessment

Conwy County Borough Council Local Development Plan – Policies relevant to the Land Use and Recreation Assessment
Policy DP/4 – Development Criteria
Policy NTE/1 – The Natural Environment
Policy CFS/12 – Safeguarding existing open space
Denbighshire County Council Local Development Plan – Policies relevant to the Land Use and Recreation Assessment
Policy BSC11 – Recreation and Open Space
Policy PSE1 – North Wales Coast Strategic Regeneration Area
Policy PSE13 – Coastal Tourism Protection Zones

1.5.19.11 As with NPS EN-1, **paragraphs 3.58 and 3.59 of PPW11** seek to protect best and most versatile agricultural land, which should be conserved as a finite resource for the future. The approach to the identification and assessment of potential effects on agricultural land as set out above in relation to NPS EN-1 also accord with the requirements of PPW11.

1.5.19.12 Similarly, **Policies DP/4 and NTE/1 of the Conwy LDP** also seek to protect the best and most versatile agricultural land.

1.5.19.13 The Conwy LDP also includes **Policy CFS/12** which seeks to safeguard existing open space such as recreation, public open space, allotments and amenity green space and **Policies PSE 1 and PSE13** support the retention of tourism related facilities in the borough. Likewise, **Policy BSC 11 of the Denbighshire LDP** seeks to protect existing recreation, public open space, allotments and amenity green space.

Summary

Summary of Effects

1.5.19.14 The potential effects in relation to land use and recreation associated with the Mona Offshore Wind Project include loss of best and most versatile agricultural land, disruption to the operation of farm holdings and disruption to the recreational use of the Wales Coast Path, National Cycle Route (NCR) 5 and several Public Rights of Way (PRoWs).

1.5.19.15 Measures have been adopted as part of the Mona Offshore Wind Project to mitigate those potential effects, such as the inclusion of an Outline Soil Management Plan (Document Reference J26.8) as part of the Outline CoCP (Document Reference J26), which contains measures designed to maintain the quality of agricultural land and allow continued operation of farm holdings during construction.

1.5.19.16 In addition, measures adopted as part of the Mona Offshore Wind Project also include an Outline Public Rights of Way Management Strategy (Document Reference J26.17), which identifies measures to avoid severance and to maintain access to affected PRoWs during construction.

1.5.19.17 Taking into account the measures in the Outline CoCP (Document Reference J26), including the Outline Soil Management Plan (Document Reference J26.8) and Outline Public Rights of Way Management Strategy (Document Reference J26.17), no significant effects are considered likely to occur with respect to land use and recreation as a result of the Mona Offshore Wind Project.

1.5.19.18 Similarly, there would be no significant cumulative effects, nor any significant transboundary effects during the construction, operations and maintenance and decommissioning phases of the Mona Offshore Wind Project with respect to the land use and recreation.

Policy Compliance

1.5.19.19 The land use and recreation assessment has been undertaken in accordance with the requirements of NPS EN-1 and PPW11, as set out above.

1.5.19.20 There are considered to be no significant land use and recreation effects as a result of the Mona Offshore Project.

1.5.19.21 Given the limited effects of the Mona Offshore Wind Project in relation to land use and recreation, it is considered that the Mona Offshore Wind Project accords with the requirements of NPS EN-1, PPW and the relevant policies of both the Conwy and Denbighshire LDPs

1.5.19.22 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on land use and recreation, which are not significant in EIA terms.

1.5.20 Traffic and Transport

1.5.20.1 This topic is assessed in Volume 3, Chapter 8: Traffic and transport of the Environmental Statement (Document Reference F3.8).

1.5.20.2 Table 1.42 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to the traffic and transport assessment. Those paragraphs are set out in full in the NPS Tracker

(Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.42: Summary of National Policy Statements relevant to the Traffic and Transport Assessment.

National Policy Statements – Paragraphs relevant to the Traffic and Transport Assessment
EN-1
Traffic and Transport – Applicant Assessment – Paragraph 5.14.5 – 5.14.7
Traffic and Transport – Mitigation – Paragraph 5.14.11 – 5.11.14
Traffic and Transport – Mitigation – Paragraph 5.14.18
Traffic and Transport – Secretary of State Decision Making – Paragraph 5.14.21

1.5.20.3 Volume 3, Chapter 8: Traffic and transport of the Environmental Statement (Document Reference F3.8) provides an analysis of the impacts on traffic and transport during construction. The assessment considers all relevant potential transport impacts during the construction, operations, and decommissioning phases of the Mona Offshore Wind Project. Associated noise is considered in Volume 3, Chapter 9: Noise and vibration of the Environmental Statement (Document Reference F3.9) and emissions are considered in Volume 3, Chapter 10 Air Quality of the Environmental Statement (Document Reference F3.10).

1.5.20.4 The traffic and transport study area was established to include all relevant routes along the connecting transport network. Welsh Government and the Denbighshire County Council (DCC) and Conwy County Borough Council (CCBC) highway authorities were consulted on the potential impacts and mitigation relevant to the strategic and local road network in accordance with **NPS EN-1 Paragraph 5.14.6**.

1.5.20.5 A Transport Assessment (TA) has been incorporated into the assessment within Volume 3, Chapter 8: Traffic and transport of the Environmental Statement (Document Reference F3.8) in accordance with guidance and best practice as required by **NPS EN-1 Paragraph 5.14.5**. Again, the scope was discussed and agreed with the relevant Highway Authorities.

1.5.20.6 Where appropriate, the Mona Offshore Wind Project will facilitate and encourage movement by sustainable means. However, it is recognised that the linear nature of the works, the absence of a fixed permanent work site along the Mona Onshore Cable Corridor and the rural nature of much of the Mona Onshore Cable Corridor may make it difficult to implement a standard travel plan for Mona Onshore Cable Corridor working as required by **NPS EN-1 Paragraph 5.14.7**.

1.5.20.7 Additional transport infrastructure as part of the Mona Offshore Wind Project is limited to the provision of a number of mostly temporary construction accesses along the Mona Onshore Cable Corridor that will be reinstated to their former state following completion of construction works. The Outline Highways Access Management Plan (HAMP) (Document Reference J26.16) confirms that only one access (TCC 1) will be retained. This is because the improved turning ability of vehicles through the access will provide a highway safety benefit on the A547 Abergele Road.

1.5.20.8 The Outline Construction Traffic Management Plan (CTMP) (Document Reference J26.13) submitted with the application sets out public transport and car sharing to

consolidate and reduce trips. In addition, the CTMP sets out routeing for construction HGVs and construction staff seeking to avoid sensitive links and receptors. Annex 8.4 Public transport networks (Document Reference F7.8.4) of the Environmental Statement sets out the public transport network in the vicinity of the Mona Onshore Development Area in order to accord with **NPS EN-1 Paragraph 5.14.11**.

1.5.20.9 Having regard to **NPS EN-1 Paragraph 5.14.12**, the measures adopted as part of the Mona Offshore Wind Project relate to the routeing and timing of HGV movements and management of construction staff movement are not expected to require the provision of any new inland transport infrastructure apart from temporary improvements to Mona Onshore Cable Corridor access points and temporary construction compound areas will provide appropriate facilities for HGV drivers in accordance with **NPS EN-1 Paragraphs 5.14.13 and 5.14.18**.

1.5.20.10 As required by **NPS EN-1 Paragraph 5.14.14** HGV routes have been identified and restrictions on HGV timing will be proposed if necessary to avoid adverse impact on sensitive receptors, particularly schools and the design of the construction works will avoid the risk of HGV parking on surrounding highway and the transport of abnormal indivisible loads will be limited and is expected to cause minimal disruption.

Other Policy Considerations

1.5.20.11 Table 1.43 below lists other national policy considerations relevant to the traffic and transport assessment.

Table 1.43: Summary of Other National Policy Considerations relevant to the Traffic and Transport Assessment.

PPW 11 – Paragraphs relevant to the Traffic and Transport Assessment
Transport - Paragraph 4.1.1

1.5.20.12 Table 1.44 below lists other local policy considerations relevant to the traffic and transport assessment.

Table 1.44: Summary of Other Local Policy Considerations relevant to the Traffic and Transport Assessment.

Conwy County Borough Council Local Development Plan – Policies relevant to the Traffic and Transport Assessment
Sustainable Transport Strategy Statement - Paragraph 4.8.2.1
Denbighshire County Council Local Development Plan – Policies relevant to the Traffic and Transport Assessment
Policy STR/3 – Mitigating Travel Impact

1.5.20.13 In accordance with the aims for more sustainable transport choices in **PPW11 paragraph 4.1.1** and **paragraph 4.8.2.1 of the Sustainable Transport Strategy Statement within the Conwy LDP** and section 8.5.2 of Volume 3, Chapter 8: Traffic and transport of the Environmental Statement (Document Reference F3.8) sets out the available public transport to the Mona Onshore Cable Corridor and Onshore Substation areas and section 8.5.3 sets out the existing pedestrian and cycling infrastructure within the traffic and transport study area.

1.5.20.14 An Outline CTMP (Document Reference J26.13) is included in the application. This highlights sustainable transport options to the Mona Onshore Cable Corridor and Onshore Substation areas for construction staff and promotes car sharing between construction staff.

1.5.20.15 Also, in accordance with **paragraph 4.8.2.1 of the Sustainable Transport Strategy Statement within the Conwy LDP**, the Mona Offshore Wind Project has Volume 3, Chapter 8: Traffic and transport of the Environmental Statement (Document Reference F3.8) assessed all potential impacts on traffic and transport during construction. The chapter is supported by a full Transport Assessment, the information for which is included in Document References F7.8.1 – F7.8.7.

1.5.20.16 **Policy STR/3 of the Denbighshire LDP** includes similar requirements to PPW11 and the Conwy LDP with regard to assessing and mitigating the impact of new developments on traffic and transport. The Mona Offshore Wind Project therefore also complies with this policy.

Summary

Summary of Effects

1.5.20.17 The Outline CoCP (Document Reference J26) includes an Outline CTMP (Document Reference J26.13) which contains measures to avoid or reduce impacts of construction traffic on the local road network and an Outline HAMP (Document Reference J26.16) which contains measures to maintain highway safety associated with construction accesses.

1.5.20.18 The Mona Offshore Wind Project will only result in temporary effects in relation to traffic and transport associated with the construction phase, however none of these effects, such as driver or pedestrian delay, severance, non-motorised user amenity, road safety or use of abnormal indivisible loads are considered to be significant. Very limited traffic will result from the operations and maintenance of the Mona Offshore Wind Project.

1.5.20.19 Accordingly, no significant effects are likely to occur with respect to traffic and transport during construction, operations and maintenance and decommissioning of the Mona Offshore Wind Project.

1.5.20.20 Indeed, the Outline HAMP (Document Reference J26.16) confirms that one construction access will be retained (TCC 1) and the reason for this is because the improved turning ability of vehicles through the access will provide a highway safety benefit on the A547 Abergele Road.

1.5.20.21 No significant cumulative effects or significant transboundary effects are anticipated in relation to traffic and transport during construction, operation and maintenance of the Mona Offshore Wind Project.

Policy Compliance

1.5.20.22 The traffic and transport assessment has been undertaken in accordance with the requirements of NPS EN-1, PPW11 and both the Conwy and Denbighshire LDPs, as set out above.

1.5.20.23 There are considered to be no significant adverse traffic and transport effects as a result of the Mona Offshore Project and the retention of an improved construction access will provide a highway safety benefit on the A547 Abergele Road.

1.5.20.24 Given the limited effects of the Mona Offshore Wind Project in relation to traffic and transport, it is considered that the Mona Offshore Wind Project accords with the requirements of NPS EN-1, PPW11 and the relevant policies of both the Conwy and Denbighshire LDPs.

1.5.20.25 Paragraph 5.14.21 of NPS EN-1 also confirms that the Secretary of State should only consider refusing development on traffic and transport grounds if there would be an unacceptable impact on highway safety, residual impacts would be severe, or no consideration has been given to the provision of adequate active public or shared transport access.

1.5.20.26 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on traffic and transport, which are not significant in EIA terms.

1.5.21 Noise and Vibration

1.5.21.1 This topic is assessed in Volume 3, Chapter 9: Noise and vibration of the Environmental Statement (Document Reference F3.9).

1.5.21.2 Table 1.45 below includes a list of paragraphs within the relevant NPSs that are considered relevant to the assessment undertaken in relation to the noise and vibration assessments. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.45: Summary of National Policy Statements relevant to the Noise and Vibration Assessment.

National Policy Statements – Paragraphs relevant to the Noise and Vibration Assessment
EN-1
Noise and Vibration – Applicant Assessment – Paragraph 5.12.6
Noise and Vibration – Applicant Assessment – Paragraph 5.12.8 – 5.12.9
Noise and Vibration – Applicant Assessment – Paragraph 5.12.12
Noise and Vibration – Secretary of State Decision Making – Paragraph 5.12.18
EN-5
Applicant Assessment – Impacts – Paragraphs 2.9.37 and 2.9.38

1.5.21.3 In accordance with **NPS EN-1 paragraph 5.12.6 and 5.12.9**, noise sensitive receptors within the Mona Offshore Wind Project operational noise study area are outlined in Volume 7, Annex 9.3: Operational noise assessment of the Environmental Statement (Document Reference F7.9.3), as well as the details of the noise generating equipment proposed for the operations and maintenance phase of the Onshore Substation. A baseline sound survey was undertaken to characterise the existing acoustic environment and obtain representative background sound levels at representative receptors; the results have informed the assessment of operational noise sources in line with the appropriate British Standard guidance (as listed within Document Reference F7.9.3). Full details of the survey are provided in Volume 7, Annex 9.1: Baseline sound survey of the Environmental Statement (Document Reference F7.9.1). The information is used in the assessment within Volume 3, Chapter 9: Noise and vibration of the Environmental Statement (Document Reference F3.9) and

representative levels derived are presented in Table 9.13 of that chapter. This noise assessment work also meets the requirements of **NPS EN-5 paragraphs 2.9.37 and 2.9.38**.

1.5.21.4 An assessment of the potential impacts at receptors during the most affected operational period (night-time) is provided in section 9.9 Volume 3, Chapter 9: Noise and vibration of the Environmental Statement (Document Reference F3.9), with full details of the methodology and mitigation measures required provided in Volume 7, Annex 9.3: Operational noise assessment of the Environmental Statement (Document Reference F7.9.3) in accordance with **NPS EN-1 paragraph 5.12.6 and 5.12.12**.

1.5.21.5 Also, in accordance with **NPS EN-1 paragraph 5.12.6** an assessment of the construction noise and vibration impacts of the Mona Offshore Wind Project is presented in section 9.9 of Volume 3, Chapter 9: Noise and vibration of the Environmental Statement (Document Reference F3.9), with full details provided in Volume 7, Annex 9.2: Construction noise and vibration technical report of the Environmental Statement (Document Reference F7.9.2). Consideration is given to the period where construction activities are likely to give rise to the greatest impacts.

1.5.21.6 As required by **NPS EN-1 paragraph 5.12.8**, consideration has also been given to the potential noise impact of ancillary activities, such as increased road traffic movements. This has been done in accordance with relevant guidance such as Calculation of Road Traffic Noise (CRTN) (Department for Transport, 1988) and DMRB– LA111 – Noise and vibration (Highways England, Transport Scotland, Llywodraeth Cymru, Department for Infrastructure, 2020).

1.5.21.7 Details of the mitigation measures adopted as part of the Mona Offshore Wind Project are outlined in section 9.8 of Volume 3, Chapter 9: Noise and vibration of the Environmental Statement (Document Reference F3.9) and any additional mitigation required is presented in section 9.9 of the chapter. In addition, and in accordance with **NPS EN-1 paragraph 5.12.1**, the draft DCO (Document Reference C1) includes Requirement 17 which will limit operational noise from the Onshore Substation.

Other Policy Considerations

1.5.21.8 Table 1.46 below lists other national policy considerations relevant to the noise and vibration assessment.

Table 1.46: Summary of Other National Policy Considerations relevant to Noise and Vibration Assessment.

PPW 11 – Paragraphs relevant to the Noise and Vibration Assessment
Renewable and Low Carbon Energy - Paragraph 5.9.20
Air Quality and Soundscape - Paragraph 6.7.21
Technical Advice Notes relevant to the Noise and Vibration Assessment
TAN 11: Noise

1.5.21.9 Table 1.47 below lists other local policy considerations relevant to the Noise and Vibration Assessment. These include policies from the Conwy County Borough Council Local Development Plan and Denbighshire County Council Local Development Plan.

Table 1.47: Summary of Other Local Policy Considerations relevant to the Noise and Vibration Assessment.

Conwy County Borough Council Local Development Plan – Policies relevant to the Noise and Vibration Assessment
Policy DP/1 – Sustainable Development Principles
Policy NTE/1 – The Natural Environment
Denbighshire County Council Local Development Plan – Policies relevant to the Noise and Vibration Assessment
Policy RD1 – Sustainable development and good standard design
Policy VOE10 – Renewable energy technologies

1.5.21.10 As set out in relation to the requirements of NPS EN-1 above, the construction, operations and maintenance, and decommissioning phases of the Mona Offshore Wind Project have been assessed in relation to noise using the principles in the appropriate British Standards. The assessment is presented in Volume 3, Chapter 9: Noise and vibration of the Environmental Statement (Document Reference F3.9) with further detail provided in Volume 7, Annex 9.2: Construction noise and vibration technical report and Volume 7, Annex 9.3: Operational noise assessment of the Environmental Statement (Document References F7.9.2 and F7.9.3).

1.5.21.11 The noise assessment for the Mona Offshore Wind Project includes a baseline sound survey undertaken at locations representative of the nearest and most exposed noise-sensitive receptors for the Onshore Substation, the temporary construction compounds and landfall. Details are provided in Volume 7, Annex 9.1: Baseline sound survey of the Environmental Statement (Document Reference F7.9.1). Volume 3, Chapter 9: Noise and vibration of the Environmental Statement (Document Reference F3.9) also includes details of the mitigation measures in sections 9.8 and 9.9. Accordingly, the Mona Offshore Wind Project complies with the requirements of **paragraphs 5.9.20 and 6.7.21 of PPW11 and TAN11**.

1.5.21.12 Similarly, the noise assessment work outlined above complies with the requirements of **Policies DP/1 and NTE/1 of the Conwy LDP** and **Policies VOE10 and RD1 of the Denbighshire LDP**.

Summary

Summary of Effects

1.5.21.13 Information on noise and vibration was collected through desktop review and site surveys. The noise and vibration assessment for the Mona Offshore Wind Project was undertaken in accordance with the requirements of NPS EN-1, NPS EN-5, PPW11 and the Conwy and Denbighshire LDPs, as set out above

1.5.21.14 The noise and vibration assessment has, in particular, considered noise arising from the construction of the offshore generation assets, the Mona Onshore Cable Corridor and the Onshore Substation, vibration from the construction of the Mona Onshore Cable Corridor and Onshore Substation and operational noise from the Onshore Substation.

1.5.21.15 The assessment has taken into account the measures adopted as part of the Mona Offshore Wind Project in relation to noise and vibration, which includes an Outline

Construction Noise and Vibration Management Plan (Document Reference J26.3) as part of the Outline CoCP (Document Reference J26). This contains measures to avoid or reduce impacts of noise and vibration generated during construction of the Mona Offshore Wind Project.

1.5.21.16 During operation a noise limit (34 A-weighted decibels, dBA) for the Onshore Substation is proposed to be imposed. This will avoid adverse noise effects related to residential amenity and public health. The operational noise limit for the Onshore Substation will be secured under Requirement 17 of the Draft DCO (Document Reference C1).

1.5.21.17 As a result, no significant effects are likely to occur with respect to noise and vibration during construction, operations and maintenance and decommissioning of the Mona Offshore Wind Project.

1.5.21.18 Similarly, there would be no significant cumulative effects with respect to noise and vibration during construction, operation and maintenance and decommissioning of the Mona Offshore Wind Project, nor would there be any significant transboundary effects.

Policy Compliance

1.5.21.19 There are considered to be no significant noise and vibration effects as a result of the Mona Offshore Wind Project.

1.5.21.20 Given the limited effects of the Mona Offshore Wind Project in relation to noise and vibration, it is considered that the Mona Offshore Wind Project accords with NPS EN-1, NPS EN-5, PPW11 and the relevant policies of both the Conwy and Denbighshire LDPs.

1.5.21.21 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on noise and vibration, which are not significant in EIA terms.

1.5.22 Air Quality

1.5.22.1 This topic is assessed in Volume 3, Chapter 10: Air quality of the Environmental Statement (Document Reference F3.10).

1.5.22.2 Table 1.48 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to the air quality assessment. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.48: Summary of National Policy Statements relevant to the Air Quality Assessment.

National Policy Statements – Paragraphs relevant to the Air Quality Assessment
EN-1
Air Quality and Emissions – Applicant Assessment – Paragraph 5.2.8 and 5.2.9

1.5.22.3 The potential air quality impacts which may arise during construction and decommissioning of the Mona Offshore Wind Project have been described and considered in Volume 3, Chapter 10: Air quality of the Environmental Statement (Document Reference F3.10) as required by **NPS EN-1 paragraph 5.2.8**.

1.5.22.4 Due the Mona Offshore Wind Project's limited potential for effects in relation to air quality, especially during the operations and maintenance phase, Volume 3, Chapter 10: Air quality of the Environmental Statement (Document Reference F3.10) focuses on the potential impacts from dust generated during construction and decommissioning of the Project. It also considers mitigation and residual effects as required by **NPS EN-1 paragraph 5.2.9**.

1.5.22.5 The vehicle movements generated by construction activities and their associtated routes in relation to the Mona Offshore Wind Project are set out in Volume 3, Chapter 8: Traffic and transport of the Environmental Statement (Document Reference F3.8). The potential air quality effects associated with emissions from the traffic generated were assessesed in section 10.8 of Volume 3, Chapter 10: Air quality of the Environmental Statement (Document Reference F3.10) within an appropriate air quality study area using dispersion modelling.

Other Policy Considerations

1.5.22.6 Table 1.49 below lists other national policy considerations relevant to the air quality assessment.

Table 1.49: Summary of Other National Policy Considerations relevant to the Air Quality Assessment.

PPW 11 – Paragraphs relevant to the Air Quality Assessment
Air Quality and Soundscape – Paragraphs 6.7.18 and 6.7.21

1.5.22.7 Table 1.50 below lists other local policy considerations relevant to the air quality assessment.

Table 1.50: Summary of Other Local Policy Considerations relevant to the Air Quality Assessment.

Conwy County Borough Council Local Development Plan – Policies relevant to the Air Quality Assessment
Policy DP/1 – Sustainable Development Principles
Policy NTE/1 – The Natural Environment
Denbighshire County Council Local Development Plan – Policies relevant to the Air Quality Assessment
Policy VOE10 – Renewable Energy Technologies
Policy RD1 – Sustainable development and good standard design

1.5.22.8 The potential air quality impacts which may arise during construction and decommissioning of the Mona Offshore Wind Project have been described and considered in Volume 3, Chapter 10: Air quality of the Environmental Statement (Document Reference F3.10) as outlined above in relation to the requirements of NPS EN-1. The assessment undertaken also meets the requirements of **Section 6.7 of PPW11**.

1.5.22.9 Similarly, the noise assessment work outlined above complies with the requirements of **Policies DP/1 and NTE/1 of the Conwy LDP** and **Policies VOE10 and RD1 of the Denbighshire LDP**.

Summary

Summary of Effects

1.5.22.10 Potential effects in respect of air quality relate only to during the construction and decommissioning phases of the Mona Offshore Wind Project. These include the effect of dust soiling on property from construction and decommissioning activities, the effect of particulate matter on people from construction and decommissioning activities and the effect of particulate matter on ecology from construction and decommissioning activities.

1.5.22.11 Taking into account the specific measures proposed as part of the Mona Offshore Wind Project in the Outline Dust Management Plan (Document Reference J26.2) within the Outline CoCP (Document Reference J26), no significant effects are considered likely to occur as a result of the Mona Offshore Wind Project.

1.5.22.12 Additionally, no significant cumulative effects with respect to air quality are anticipated during the construction, operations and maintenance and decommissioning phases of the Mona Offshore Wind Project. It is also considered that there is no potential for significant transboundary effects.

Policy Compliance

1.5.22.13 There are considered to be no significant air quality effects as a result of the Mona Offshore Wind Project.

1.5.22.14 Given the limited effects of the Mona Offshore Wind Project in relation to air quality, it is considered that the Mona Offshore Wind Project accords with NPS EN-1, NPS EN-5, PPW11 and the relevant policies of both the Conwy and Denbighshire LDPs

1.5.22.15 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on air quality, which are not significant in EIA terms.

1.5.23 Civil and military aviation and defence interests

1.5.23.1 This topic is assessed in Volume 4, Chapter 1: Aviation and radar of the Environmental Statement (Document Reference F4.1).

1.5.23.2 Table 1.51 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to the aviation and radar assessments. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.51: Summary of National Policy Statements relevant to the Civil, Military Aviation and Defence Interests Assessment.

National Policy Statements – Paragraphs relevant to the Civil, Military Aviation and Defence Interests Assessment
EN-1
Civil and Military Aviation and Defence Interests – Safeguarding – Paragraph 5.5.11
Civil and Military Aviation and Defence Interests – Applicant Assessment – Paragraph 5.5.37 – 5.5.40
Civil and Military Aviation and Defence Interests – Applicant Assessment – Paragraph 5.5.42 and 5.5.43
Civil and Military Aviation and Defence Interests – Decision Making – Paragraph 5.5.55

National Policy Statements – Paragraphs relevant to the Civil, Military Aviation and Defence Interests Assessment
EN-3
Offshore Wind – Applicant Assessment – Paragraph 2.8.50
Offshore Wind – Mitigation – Paragraph 2.8.240
Offshore Wind – Mitigation – Paragraph 2.8.261

1.5.23.3 The construction, operations and maintenance, and decommissioning phases of the Mona Offshore Wind Project have been assessed in respect of potential effects on aviation and radar as set out in Volume 4, Chapter 1: Aviation and radar of the Environmental Statement (Document Reference F4.1) as required by **NPS EN-1 paragraph 5.5.37**.

1.5.23.4 In accordance with **NPS EN-1 paragraph 5.5.39** and **NPS EN-3 paragraph 2.8.261**, consultation with stakeholders such as the MOD, Met Office, Civil Aviation Authority (CAA), NATS and relevant aerodromes, has been undertaken in preparing the assessment and this consultation is reported in Volume 4, Chapter 1: Aviation and radar of the Environmental Statement (Document Reference F4.1). A full record of consultation is also provided in the Consultation Report (Document Reference E.3).

1.5.23.5 An assessment of the impact of the Mona Offshore Wind Project on the operation and safety of aerodromes has been completed as required by **NPS EN-1 paragraph 5.5.11**. This is included in the Instrument Flight Procedures analysis within Volume 8, Annex 1.1 Aviation and radar technical report of the Environmental Statement (Document Reference F8.1.1). Any necessary mitigation relating to aviation radar systems is the subject of engagement with mitigation principles for each affected radar included in the assessment of effects in accordance with **NPS EN-1 paragraph 5.5.43**.

1.5.23.6 The assessment of civil and military aviation radar is provided in Volume 8, Annex 1.1 Aviation and radar technical report of the Environmental Statement (Document Reference F8.1.1) as required by **NPS EN-1 paragraph 5.5.40** and **NPS EN-3 paragraph 2.8.50** and other aviation and defence interests are discussed in the establishment of the baseline in accordance with **NPS EN-1 paragraph 5.5.38**. An assessment of aviation flight patterns is also provided in Volume 8, Annex 1.1 Aviation and radar technical report of the Environmental Statement (Document Reference F8.1.1) and cumulative impacts are discussed within the cumulative effect assessment in Volume 4, Chapter 1: Aviation and radar of the Environmental Statement (Document Reference F4.1).

1.5.23.7 In compliance with **NPS EN-1 paragraph 5.5.42** all relevant changes made during the pre-application period have been communicated to the relevant consultees and are captured in the summary consultation tables within Volume 4, Chapter 1: Aviation and radar of the Environmental Statement (Document Reference F4.1).

1.5.23.8 Volume 8, Annex 1.1: Aviation and radar technical report of the Environmental Statement Appendix B, IFP assessment considers airport safeguarded surfaces and the impact of the Mona Offshore Wind Project on aircraft operations through the creation of physical obstacles is assessed in section 1.9.1 of Volume 4, Chapter 1: Aviation and radar of the Environmental Statement (Document Reference F4.1).

1.5.23.9 Low flying is considered as part of the baseline in paragraph 1.5.1.4 of Volume 4, Chapter 1: Aviation and radar of the Environmental Statement (Document Reference F4.1).

1.5.23.10 Aviation lighting is considered as embedded mitigation and is discussed in Table 1.19 of Volume 4, Chapter 1: Aviation and radar of the Environmental Statement (Document Reference F4.1) as required by **NPS EN-1 paragraph 5.5.55** and **NPS EN-3 paragraph 2.8.40**.

Summary

Summary of Effects

1.5.23.11 The potential effects in respect of aviation and radar associated with the construction, operations and maintenance, and decommissioning phases of the Mona Offshore Wind Project, were identified as being due to the creation of physical obstacles to aircraft operations and due to wind turbines causing interference on civil and military Primary Surveillance Radar (PSR).

1.5.23.12 The creation of physical obstacles to aircraft operations could take place during all phases of the Mona Offshore Wind Project due to the implementation, operation or removal of physical objects forming part of the Mona Array Area. A range of adopted measures, in the form of appropriate notification to aviation stakeholders, regularity of layout and lighting and marking to minimise effects to aviation flight operations will be incorporated into the Mona Offshore Wind Project in order mitigate these effects.

1.5.23.13 Information regarding construction will be passed to the Defence Geographic Centre (DGC) in advance of the obstacle type(s) erection. This information will detail the position, height (tip of arc) and type of aviation lighting to be installed. Once reported, the information will be included in the DCG Obstruction Database and any details that meet aviation chart inclusion criteria will be published for broader awareness. Appropriate information about construction and any associated lighting will also be provided to the NATS Aeronautical Information Service (AIS).

1.5.23.14 In terms of layout and regularity, the Mona Offshore Wind Project will have regard for the Maritime and Coastguard Agency Marine Guidance Note (MGN) 654 Safety of Navigation Offshore Renewable Energy Installations (OREI) - Guidance on UK Navigational Practice, Safety and Emergency Response, in addition to CAP 393 Air Navigation Order 2022, CAP 764 CAA Policy and Guidelines on Wind Turbines and CAP 437 Standards for Offshore Helicopter Landing Areas, where applicable, and the final array layout will include two lines of orientation for search and rescue purposes.

1.5.23.15 Appropriate marking, lighting and aids to navigation will be used during the construction, operations and maintenance and decommissioning phases of the Project, as appropriate, to ensure the safety of all parties. Appropriate lighting, in line with Maritime and Coastguard Agency guidance will ensure that offshore structures are visible for search and rescue and emergency response procedures.

1.5.23.16 Having regard to the above, the effect is considered not to be significant in EIA terms.

1.5.23.17 In respect of wind turbines interference on civil and military PSR, the turbines in the Mona Array Area would be theoretically detectable by the NATS Lowther Hill, St Anne's and Great Dun Fell PSR, the Ronaldsway Airport, the Liverpool Airport and BAE Warton PSR systems. Wind turbines detectable by a PSR system might degrade the system by creating false targets, reduce system sensitivity, create radar shadowing

behind the wind turbines and saturate the radar receiver, leading to clutter potentially concealing real aircraft targets.

1.5.23.18 This effect is not considered to be significant when technical mitigation, such as radar blanking and radar infill, or an application for an airspace change to implement a Transponder Mandatory Zone (TMZ) is agreed with affected airports. It is anticipated that agreed mitigation will secured through a Requirement in the DCO.

1.5.23.19 The cumulative effects in relation to both physical obstacles and turbine interference, when factoring in the measures to be adopted as part of the Mona Offshore Wind Project are also predicted not to be significant.

1.5.23.20 Likewise, it is considered that there is no potential for significant transboundary effects with regard to aviation and radar from the Mona Offshore Wind Project upon the interests of other EEA States.

Policy Compliance

1.5.23.21 As set out above, the aviation and radar assessments undertaken for the Mona Offshore Wind Project. Have met the requirements of NPS EN-1 and NPS EN-3.

1.5.23.22 Given the limited effects of the Mona Offshore Wind Project in relation to aviation and radar matters as set out above and incorporating the measures which will be secured through a Requirement of the DCO, it is considered that the Mona Offshore Wind Project accords with NPS EN-1 and NPS EN-3.

1.5.23.23 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on civil and military aviation and defence interests.

1.5.24 Climate Change

1.5.24.1 This topic is assessed in Volume 4, Chapter 2: Climate change of the Environmental Statement (Document Reference F4.2).

1.5.24.2 Table 1.52 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to the climate change assessment. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.52: Summary of National Policy Statements relevant to the Climate Change Assessment.

National Policy Statements – Paragraphs relevant to the Climate Change Assessment
EN-1
Climate Change Adaption and Resilience – Applicant Assessment – Paragraph 4.10.7 – 4.10.12
EN-3
Climate Change Adaption and Resilience – Paragraph 2.4.3
Climate Change Adaption and Resilience – Offshore Wind – Paragraph 2.4.8
EN-5
Climate Change Adaption and Resilience – Paragraph 2.3.2 and 2.3.3

1.5.24.3 As detailed within Volume 4, Chapter 2: Climate change of the Environmental Statement (Document Reference F4.2) and Volume 8, Annex 2.2: Climate change risk assessment technical report of the Environmental Statement (Document Reference F8.2.2) a risk assessment has been undertaken, considering the hazard, potential severity of impact on the Mona Offshore Wind Project and its users (including their sensitivity and vulnerability), the probability of the impact and the level of influence the Mona Offshore Wind Project design can have on the risk. The approach taken complies with the requirements of **NPS EN-1 paragraphs 4.10.8, 4.10.9 and 4.10.11, NPS EN-3 paragraphs 2.4.3 and 2.4.8** and **NPS EN-5 paragraphs 2.3.2 and 2.3.3** and utilises appropriate government guidance and industry standard benchmarks such as the Climate Change Allowances for Flood Risk Assessments and Climate Impacts Tool and British Standards for climate change adaptation.

1.5.24.4 The assessment of climate risk has accounted for primary mitigation measures required to reduce potential climate risk to acceptable levels. These have been considered across the lifetime of the Mona Offshore Wind Project.

1.5.24.5 The assessments in Volume 4, Chapter 2: Climate change of the Environmental Statement (Document Reference F4.2) and Volume 8, Annex 2.2: Climate change risk assessment technical report of the Environmental Statement (Document Reference F8.2.2) recognise that climate change is expected to increase sea levels and peak rainfall intensity which will be relevant to the Mona Offshore Wind Project.

1.5.24.6 The climate change assessment work undertaken for the Mona Offshore Wind Project as set out in Volume 4, Chapter 2: Climate change of the Environmental Statement (Document Reference F4.2) has considered how/if changes to climatic parameters might exacerbate or alter assessments of effects in a future baseline scenario as required by **NPS EN-1 paragraphs 4.10.10 and 4.10.12**.

1.5.24.7 A climate change allowance of 40% in accordance with the total potential change anticipated for the '2080s' (2070 to 2115) has been used within the conceptual drainage strategy which has been undertaken as part of the FCA (Document Reference F7.2.1) in accordance with NPS, PPW and TAN15 requirements. Sea level rise has also been taken into account within flood risk analysis to the landfall area (Volume 3, Chapter 2: Hydrology and flood risk of the Environmental Statement (Document Reference F3.2).

1.5.24.8 Whilst not specifically related to the climate change assessment of the Mona Offshore Wind Project, **NPS EN-1 paragraph 4.10.7** notes that in addition to avoiding further GHG emissions when compared with more traditional adaptation approaches, nature-based solutions can also result in biodiversity benefits and net gain, as well as increasing absorption of carbon dioxide from the atmosphere. In this regard the Mona Offshore Wind Project includes a Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7) within which a number of opportunities which could deliver both offshore and onshore biodiversity benefits are set out. In particular, the onshore benefits, which include hedgerow enhancements, the creation of woodland belts, tree planting and the creation of species rich hedgerows and areas of grassland, scrub, and wildflowers would provide such solutions.

Other Policy Considerations

1.5.24.9 Table 1.53 below lists other national policy considerations relevant to the climate change assessment.

Table 1.53: Summary of Other National Policy Considerations relevant to the Climate Change Assessment.

PPW 11 – Paragraphs relevant to the Climate Change Assessment
National sustainable placemaking outcomes – Paragraph 2.15
Distinctive and Natural Places - Section 6.0

1.5.24.10 Table 1.54 below lists other local policy considerations relevant to the climate change assessment.

Table 1.54: Summary of Other Local Policy Considerations relevant to the Climate Change Assessment.

Conwy County Borough Council Local Development Plan – Policies relevant to the Climate Change Assessment
Policy NTE/1 – The Natural Environment
Denbighshire County Council Local Development Plan – Policies relevant to the Climate Change Assessment
Policy VOE 10 – Renewable energy technologies

1.5.24.11 **PPW11 Section 6** recognises the need to adaptation to the effects of climate change and refers to the need to be resilient to climate change in **paragraph 2.15**. AS set out above in relation to the requirements of NPS EN-1, NPS EN-3 and NPS EN-5, the Mona Offshore Wind Project has detailed within Volume 4, Chapter 2: Climate change of the Environmental Statement (Document Reference F4.2) and Volume 8, Annex 2.2: Climate change risk assessment technical report of the Environmental Statement (Document Reference F8.2.2), an assessment considering the hazard, potential severity of impact on the Mona Offshore Wind Project and its users (including their sensitivity and vulnerability), the probability of that impact, and the level of influence the Mona Offshore Wind Project design can have on the risk in order to accord with PPW11 requirements in this regard.

1.5.24.12 Both the Conwy LDP (**Policy NTE/1**) and the Denbighshire LDP (**Policy VOE10**) include policies that recognise the need to adapt to climate change. Again, these polices are complied with having regard to the assessments undertaken in relation to climate change as part of the Mona Offshore Wind Project.

Summary

Summary of Effects

1.5.24.13 The potential effects assessed include the impact of GHG emissions arisings from land-use and sea bed change, from the manufacturing and installation of the generation and transmission assets and from decommissioning works (plant, fuel and vessel use) and recovery or disposal of materials, the impact of GHG emissions arising from the consumption of materials and activities required to facilitate the operations and maintenance of the Mona Offshore Wind Project and of the estimated abatement of UK Grid emissions during the operations and maintenance phase, as well as the impact of the effects of climate change on the Project.

1.5.24.14 The Mona Offshore Wind Project has adopted measures in order to mitigate potential effects, including the application of anti-corrosion protective coatings, integrated scour protection to offshore equipment, where appropriate, a safety margin within the turbine design to be fitted with automatic shutdowns/lockdowns (to prevent turbines spinning too fast). Also, if required (if it is located internally) the substation building will house appropriate cooling plant to account for a range of temperature conditions, and regular inspections will be carried out to assess turbine and substation conditions (e.g. following severe weather events).

1.5.24.15 It is concluded that during construction emissions from the manufacturing the onshore and offshore infrastructure would result in emissions of up to 2,040818 tCO2e. This would be a significant moderate adverse effect but would reduce to a minor, non-significant effect when mitigation is accounted for. However, construction must also be evaluated in terms of whole lifetime emissions from the Project.

1.5.24.16 Operation of the Mona Offshore Wind Project would enable the use of excess renewable electricity (avoiding generation curtailment) and the displacement of fossil fuels. This would result in a positive GHG effect. When considering the avoided emissions, in addition to operations and maintenance emissions, the effect results in the order of approximately 2,296,671 tCO2e savings by 2064. This would be a significant beneficial effect.

1.5.24.17 Therefore, despite the GHG emissions resulting from construction and decommissioning, the magnitude of avoided emissions resulting from the operations and maintenance phase allows the Mona Offshore Wind Project to enable avoided emissions from the end of the 12th year of operation (carbon payback period). Over the lifetime of the Mona Offshore Wind Project, it would result in 129,466 tCO2e of avoided emissions.

1.5.24.18 All developments that emit, avoid or sequester GHGs have the potential to impact the atmospheric mass of GHGs as a receptor, and so may have a cumulative impact on climate change. Cumulative effects due to other projects are not individually predicted but are taken into account when considering the impact of the Mona Offshore Wind Project by defining the atmospheric mass of GHGs as a high sensitivity receptor.

1.5.24.19 Similarly, such developments may have a transboundary impact on climate change. Consequently, transboundary effects due to other specific international development projects are not individually identified but would be taken into account when considering the impact of the Mona Offshore Wind Project by defining the atmospheric mass of GHGs as a high sensitivity receptor. Each country has its own policy and targets concerning carbon and climate change which are intended to limit GHG emissions to acceptable levels within that country's defined budget and international commitments.

Policy Compliance

1.5.24.20 In terms of climate change, the Mona Offshore Wind Project has been assessed as required by the NPS EN-1, NPS EN-3, NPS EN-5 and has taken into account the climate change considerations set out in PPW11 and the relevant policies of the Conwy and Denbighshire LDPs.

1.5.24.21 Subject to the measures proposed as part of the Mona Offshore Wind Project design, that assessment has confirmed that no significant adverse effects will occur to the Mona Offshore Wind Project having regard to climate change.

1.5.24.22 However, in terms of benefits, the Mona Offshore Wind Project would enable the use of excess renewable electricity (avoiding generation curtailment) and the displacement of fossil fuels which would be a positive GHG effect and when considering the avoided emissions, in addition to operations and maintenance emissions, the effect results in the order of approximately 2,296,671 tCO2e savings by 2064. This would be a significant beneficial effect.

1.5.24.23 Another benefit of the Mona Offshore Wind Project is that it would generate enough renewable electricity in year one to power over 1.3 million households across England and Wales.

1.5.24.24 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on climate change.

1.5.25 Socio-Economics

1.5.25.1 This topic is assessed in Volume 4, Chapter 3: Socio-economics of the Environmental Statement (Document Reference F4.3).

1.5.25.2 Table 1.55 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to the socio-economic assessment. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.55: Summary of National Policy Statements relevant to the Socio-Economic Assessment.

National Policy Statements – Paragraphs relevant to the Socio-Economic Assessment
EN-1
Socio-Economic Impacts – Applicants Assessment - Paragraphs 5.13.1 – 5.13.5
Socio-Economic Impacts – Decision Making - Paragraphs 5.13.1 – 5.13.12

1.5.25.3 **NPS EN-1 Paragraph 5.13.1** recognises that the construction, operation and decommissioning of energy infrastructure can have potential impacts at local and regional levels, so accordingly the socio-economic assessment within Volume 4, Chapter 3 Socio-economics of the Environmental Statement (Document Reference F4.3) has considered those levels in accordance with **NPS EN-1 Paragraph 5.13.2**.

1.5.25.4 As required by **NPS EN-1 Paragraph 5.13.3** consultation has been carried out with all relevant local authorities and invitations to specific non-statutory consultation sessions have been issued to seven local authorities with potential interest in the Mona Offshore Wind Project. Section 3.3 of Volume 4, Chapter 3 Socio-economics of the Environmental Statement (Document Reference F4.3) summarises the consultation undertaken.

1.5.25.5 The socio-economic assessment has considered potential economic impacts (employment, Gross Value Added (GVA), and labour market), potential social impacts (housing, accommodation and local services), potential tourism impacts, and potential impacts associated with disruption to lifeline ferry services to the Isle of Man in compliance with **NPS EN-1 Paragraphs 5.13.4 and 5.13.5**. Potential economic impacts are set out within Volume 8, Annex 3.1: Socio-economics technical impact report of the Environmental Statement (Document Reference F8.3.1). The

assessment covers employment and GVA impacts and the potential associated impacts on local employment opportunities and the sustainability of these roles (i.e whether they are likely to be temporary, permanent and short or long term).

1.5.25.6 The Applicant has committed to the provided an Outline Skills and Employment Plan (Document Reference J24), a detailed version of which is intended to be secured via a Requirement of the DCO. The Skills and Employment Strategy secured via the DCO will be used by the Applicant to help develop and support the economic benefits associated with the Mona Offshore Wind Project in relation to skills and employment within the offshore wind sector. The provision of a Skills and Employment Plan/Strategy in the manner complies with **NPS EN-1 paragraph 5.3.12**.

1.5.25.7 The significance of effects associated with potential economic impacts (employment and GVA) are assessed within sections 3.9 and 3.10 of Volume 4, Chapter 3: Socio-economics of the Environmental Statement (Document Reference F4.3) having regard to existing baseline conditions, which includes consideration of the offshore wind sector (see section 3.1.1.1 of the chapter).

Other Policy Considerations

1.5.25.8 Table 1.56 below lists other national policy considerations relevant to the socio-economic assessment.

Table 1.56: Summary of Other National Policy Considerations relevant to the Socio-economic Impact Assessment.

Future Wales: The National Plan 2040– Policies relevant to the Socio-economic Impact Assessment
North West Wales and Energy - Policy 24

1.5.25.9 Table 1.57 below lists other local policy considerations relevant to the Socio-economic Impact Assessment. These include policies from the Denbighshire County Council Local Development Plan.

Table 1.57: Summary of Other Local Policy Considerations relevant to the Socio-economic Impact Assessment.

Conwy County Borough Council Local Development Plan – Policies and Spatial Objectives relevant to the Socio-economic Impact Assessment
Strategic Objective SO4 – Economic Prosperity
Strategic Objective SO11 – Energy Consumption
Strategic Objective SO13 – Accessibility
Policy CTH/5 – The Welsh Language
The Welsh Language SPG (2014)
Denbighshire County Council Local Development Plan – Paragraphs relevant to the Socio-economic Impact Assessment
Policy RD1 - Sustainable development and good standard design
Policy RD5 - The Welsh Language and the Social and Cultural Fabric of Communities
Planning and the Welsh Language SPG (2014)

1.5.25.10 Whilst **Policy 24 of Future Wales** relates mainly to energy development in northwest Wales, it confirms that the Welsh Government supports the north Wales region as a location for new energy development and investment and, in particular, that onshore developments associated with offshore renewable energy projects will be supported in principle. The Mona Offshore Wind Project's socio-economic assessment considers how it will beneficially affect the region.

1.5.25.11 With regard to the socio-economic related policies in the Conwy LDP which seek to meet the community's needs for more jobs (Strategic Objective SO4), reduce energy consumption through the promotion or renewable energy developments (Strategic Objective SO11) and to protect and improve accessibility to essential services and facilities (Strategic Objective SO13), the socio-economics assessment presented in Volume 4, Chapter 3: Socio-economics of the Environmental Statement (Document Reference F4.3) considers how the construction, operations and maintenance, and decommissioning of the Mona Offshore Wind Project may contribute towards a higher quality of life by local communities by considering the economic benefits as well as any impacts on local health and community facilities in order to comply with their requirements.

1.5.25.12 **Policy RD1** of the **Denbighshire LDP** requires development have regard to the adequacy of existing public facilities and services and **Policy RD5** seeks to take account of the needs and interests of the Welsh language. Additionally, **Policy CTH/5** of the **Conwy LDP** ensures development supports the long-term well-being of the Welsh Language and both local planning authorities have adopted Supplementary Planning Guidance on the Welsh language.

1.5.25.13 In this regard, as well as the socio-economics assessment presented in Volume 4, Chapter 3: Socio-economics of the Environmental Statement (Document Reference F4.3), given the scale of the Mona Offshore Wind Project and the proportion of Welsh speakers within the study area, a separate Community and Linguistic Impact Assessment (CLIA) has been undertaken (Document Reference E5). The CLIA is an assessment of the predicted effects of the Mona Offshore Wind Project on Welsh language, culture and the community.

Summary

Summary of Effects

1.5.25.14 The socio-economics assessment into the construction, operations and maintenance, and decommissioning phases of the Mona Offshore Wind Project has been undertaken in accordance with the requirements of NPS EN-1 and relevant policies within the Conwy and Denbighshire LDPs.

1.5.25.15 The assessment concludes that expenditure on the Mona Offshore Wind Project has the potential to stimulate beneficial economic impacts by creating jobs and increasing output.

1.5.25.16 Economic impacts directly attributable to the Mona Offshore Wind Project, direct impacts, include, for example, the jobs supported by activities associated with delivering each phase of the Project. Indirect economic impacts are secondary impacts that occur as a result of the interactions between the Mona Offshore Wind Project and other parts of the economy. For example, the Mona Offshore Wind Project will require fabrication of components and subcomponents, and supply of equipment and transportation, all of which increases sector demand leading to economic impacts throughout the supply chain.

1.5.25.17 Induced economic impacts result from changes in household spending patterns as a consequence of direct and indirect economic impacts. For example, the employment opportunities supported by the Mona Offshore Wind Project (including those throughout the supply chain) result in workers having income to spend, leading to further economic impacts in other parts of the economy.

1.5.25.18 The socio-economic assessment of the Mona Offshore Wind Project estimates potential direct, indirect, and induced impacts during the construction phase (onshore and offshore) as follows:

- If a port in north Wales is selected to support marshalling and installation activities, it is estimated the Project's offshore and onshore activities could support 350 jobs and £46 million in GVA within north Wales
- If a port in northwest England is selected to support marshalling and installation activities, it is estimated the Project's offshore activities could support 890 jobs and £85 million in GVA within northwest England
- Based on assumptions regarding the UK content of Mona Offshore Wind Project expenditure which draw on previously delivered offshore windfarms in the UK, it is estimated the Project's offshore and onshore activities within the UK could support 9,380 jobs and £675 million in GVA.

1.5.25.19 The socio-economic assessment of the Mona Offshore Wind Project also estimates potential direct, indirect, and induced impacts during the operations and maintenance phase as follows:

- If a port in north Wales is selected as the primary operations base, it is estimated the Project's offshore activities could support 190 jobs and £25 million in GVA, per annum within north Wales
- If a port in northwest England is selected as the primary operations base, it is estimated the Project's offshore activities could support 220 jobs and £25 million in GVA, per annum within northwest England.

1.5.25.20 Due to the infrastructure requirements of large components (e.g. laydown and storage areas), it is likely that multiple fabrication and marshalling ports will be utilised during the delivery of the Mona Offshore Wind Project. Should ports outside north Wales and northwest England, but within the UK, be selected the associated economic impacts are captured within the assessment of UK economic impacts under the 'current capability' scenario. Should no port within north Wales or northwest England be selected, the associated economic impacts are captured within the assessment of sub-national economic impacts under the 'low' (or worst-case) scenario.

1.5.25.21 The assessment has also taken into consideration the measures within the Outline Skills and Employment Plan (Document Reference J24) which sets out opportunities for engagement to enable local workers and training providers to prepare for anticipated employment opportunities associated with the Mona Offshore Wind Project.

1.5.25.22 The movement of labour associated with the delivery of the Mona Offshore Wind Project also has the potential to result in social impacts. During the construction phase the roles associated with these activities are anticipated to be based largely offshore, with workers accommodated within vessels. However, these workers have the potential to give rise to demand for temporary accommodation at the start and end of typical shift periods at sea within the catchments of the relevant transfer port(s) before or after spending time at their home location.

1.5.25.23 Additional demand for overnight stays has a number of benefits. Firstly, this leads to increased revenue for overnight accommodation businesses. Secondly, maximising occupancy rates improves the efficiency of overnight accommodation providers by virtue of increased resource utilisation (staff, utilities, facilities). Finally, it increases spending in local businesses, resulting in local economic multiplier effects. It is noted however that no permanent (i.e. long term), relocation of workers is anticipated during the offshore construction phase based on the mobile nature of large parts of the offshore workforce.

1.5.25.24 Labour migration during the operations and maintenance phase of the Mona Offshore Wind Project may also increase the local population and impact on the demand for long term and permanent accommodation.

1.5.25.25 With regard to population growth, on one hand it can stimulate economic activity and development as an increased population can lead to higher demand for goods and services, which can attract businesses, create jobs, and generate revenue for the local authority. Additionally, a growing population can contribute to cultural diversity, enriching the social fabric and fostering a vibrant community.

1.5.25.26 On the other hand, population growth can place a strain on resources and infrastructure where appropriate planning is lacking. Demands on transportation, healthcare and educational capacity can become more challenging as a population expands. Effective planning for these factors is a key determinant of whether effects associated with population growth should be considered beneficial or adverse in nature. Investment in infrastructure and sustainable development approaches are necessary to ensure the benefits of population growth are maximised while minimising potentially adverse effects. Collaboration between developers, local authorities, community stakeholders and public bodies is essential to create a well-managed environment that accommodates growth while maintaining the quality of life for residents.

1.5.25.27 The socio-economic assessment of the Mona Offshore Wind Project estimates potential social impacts during the operations and maintenance phase as follows:

- If a port in north Wales is selected as the primary operations base, it is estimated that around 25 non-local workers could relocate to the selected locality. Including family members, it is estimated this would result in an increase of 65 to the north Wales household population
- If a port in northwest England is selected as the primary operations base, it is estimated that around six non-local workers could relocate to the selected locality. Including family members, it is estimated this would result in an increase of 15 residents to the northwest England household population.

1.5.25.28 In addition to the socio-economic assessment, the CLIA (Document Reference E5) presents an assessment of the predicted effects of the Mona Offshore Wind Project on Welsh language, culture and the community.

1.5.25.29 In terms of construction and decommissioning effects, the CLIA concludes:

- Neutral effects are identified in terms of population characteristics and there is no evidence to suggest that the Mona Offshore Wind Project would impact upon health and quality of life. An overall neutral effect is therefore identified on the Welsh language and culture in terms of effects on quality of life

- In terms of effects on economic factors, an overall beneficial effect is identified in terms of local businesses and local jobs and a neutral effect is identified on local salary levels and house prices
- Potential impacts on local services such as healthcare and education are anticipated to be neutral and no effect on Welsh traditions and culture are predicted
- The effects during decommissioning are expected to reflect the effects identified during construction.

1.5.25.30 In terms of operations and maintenance the CLIA concludes:

- A negligible impact on population, housing, and accommodation and a neutral effect on Welsh language and culture in terms of health and quality of life
- The employment opportunities offered are considered to be beneficial, but again a neutral effect is predicted on salaries and house prices and Welsh traditions, having regard to Welsh language and culture.

1.5.25.31 In terms of mitigation and enhancement measures, whilst no adverse effects have been identified, in order to enhance beneficial effects relating to employment opportunities, an Outline Employment and Skills Plan is submitted as part of the application (Document Reference J24) which seeks to improve local employment opportunities, including upskilling and training the local workforce.

1.5.25.32 Enhancement measures are also being considered by the Mona Offshore Wind Project in order to raise awareness and provide support to non-Welsh speaking workers and their families who may relocate to north Wales during the operations and maintenance phase of the Project. These measures could include:

- Worker information packs including opportunities to learn Welsh, information on local community events and organisations and Welsh-medium schools
- All external advertisements/signs erected as part of the Mona Offshore Wind Project being bilingual.

Policy Compliance

1.5.25.33 The socio-economics assessment into the construction, operations and maintenance, and decommissioning phases of the Mona Offshore Wind Project have identified a number of effects, all of which are considered to be beneficial.

1.5.25.34 The assessment has taken into consideration the measures within the Outline Skills and Employment Strategy (Document Reference J24) which sets out opportunities for engagement to enable local workers and training providers to prepare for anticipated employment opportunities associated with the Mona Offshore Wind Project.

1.5.25.35 There are considered to be beneficial effects on population, housing and accommodation in north Wales during construction of the Mona Offshore Wind Project and on economic receptors, including employment and GVA in north Wales during the operations and maintenance phase of the Project.

1.5.25.36 The socio-economics assessment also identifies beneficial cumulative effects on economic receptors, including employment and GVA in north Wales, northwest England, Wales and the UK during the construction and operations and maintenance phases of the Mona Offshore Wind Project, as well as beneficial cumulative effects on

the population, housing and accommodation in north Wales and northwest England during construction of the Mona Offshore Wind Project.

1.5.25.37 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on socio-economics.

1.5.26 Human Health

1.5.26.1 This topic is assessed in Volume 4, Chapter 4: Human health assessment of the Environmental Statement (Document Reference F4.4).

1.5.26.2 Table 1.58 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to the human health assessments. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.58: Summary of National Policy Statements relevant to the Human Health Assessment.

National Policy Statements – Paragraphs relevant to the Human Health Assessment
EN-1
Health – Paragraph 4.4.1 – 4.4.6
EN-5
Applicant Assessment – Impacts – Paragraph 2.9.46

1.5.26.3 As required by **NPS EN-1 paragraphs 4.4.4 and 4.4.5** potential human health effects, including inter-related and cumulative effects, of the Mona Offshore Wind Project are presented in Volume 4, Chapter 4 Human health of the Environmental Statement (Document Reference F4.4). This assessment includes consideration of indirect effects related to healthy lifestyles and potential impacts on vulnerable population groups in accordance with **NPS EN-1 paragraph 4.4.6**.

1.5.26.4 The potential human health effects of the Mona Offshore Wind Project, including indirect and direct impacts, are presented in Volume 4, Chapter 4: Human health assessment of the Environmental Statement (Document Reference F4.4). The assessment considers effects relating to traffic, air or water pollution, dust, odour, noise and exposure to radiation as relevant, having regard to the appropriate topic assessments undertaken for the Mona Offshore Wind Project set out in the Environmental Statement in order to meet the requirements of **NPS EN-1 paragraphs 4.4.1 and 4.4.2**.

1.5.26.5 This also includes consideration of the socio-economic assessment in order to consider indirect health impacts, for example access to key public services, as required by **NPS EN-1 paragraph 4.4.3**.

1.5.26.6 **NPS EN-5 paragraph 2.9.46** also requires consideration of electro-magnetic fields (EMFs) even for underground cables. Accordingly, this matter has been considered in Volume 4, Chapter 4: Human health assessment of the Environmental Statement (Document Reference F4.4) including consideration of public understanding of EMF exposure in terms of mental health outcomes associated with concern, whilst acknowledging that actual risks are unlikely to be significant for public health based on

adoption of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines.

Other Policy Considerations

1.5.26.7 Table 1.59 below lists other national policy considerations relevant to the Human Health Assessment.

Table 1.59: Summary of Other National Policy Considerations relevant to the Human Health Assessment.

PPW11 – Policies relevant to the Human Health Assessment
Human Health - Paragraph 3.24

1.5.26.8 Table 1.60 below lists other local policy considerations relevant to the human health assessment.

Table 1.60: Summary of Other Local Policy Considerations relevant to the Human Health Assessment.

Denbighshire County Council Local Development Plan – Policies relevant to the Human Health Assessment
Policy VOE10 – Renewable energy technologies

1.5.26.9 **PPW11 paragraph 3.24** also requires that potential significant effects on human health should be considered via EIAs where relevant so the assessment as part of the Mona Offshore Wind Project as presented in Volume 4, Chapter 4 Human health assessment of the Environmental Statement (Document Reference F4.4) accords with PPW11.

1.5.26.10 Likewise, it complies with the requirements of **Policy VOE10 of the Denbighshire LDP** in this regard.

Summary

Summary of Effects

1.5.26.11 Human health effects assessed as a result of the construction, operations and maintenance, and decommissioning phases of the Mona Offshore Wind Project included: effects of offshore shipping on strategic routes and lifeline ferries to the Isle of Man; the Mona Array Area affecting views and subsequent impacts on community identity; changes in offshore employment and income in relation to loss or restricted access to commercial fishing grounds; onshore construction vehicles affecting local vehicle traffic and active travel, access to recreation and leisure; noise and vibration effects, the effect of EMFs, effects on GHG emissions and the contribution to energy security provided by the Mona Offshore Wind Project.

1.5.26.12 The Mona Offshore Wind Project includes an Outline Communications Plan (Document Reference J26.4) as part of the Outline CoCP (Document Reference J26) which sets out procedures for early and ongoing information sharing with emergency and healthcare services and non-technical communication with the public that actual EMF risks are within standards set for health protection.

1.5.26.13 Taking into account the measures described above, no significant adverse effects are considered likely to occur as a result of the construction, operations and maintenance, and decommissioning phases of the Mona Offshore Wind Project.

1.5.26.14 However, significant beneficial effects are considered likely to occur during the operations and maintenance phase of the Mona Offshore Wind Project with respect to human health as a result of improved energy security.

1.5.26.15 The cumulative human health assessment identified one significant adverse effect and one significant beneficial effect with respect to human health.

1.5.26.16 The adverse cumulative effect relates to strategic routes and lifeline ferries to the Isle of Man specifically in conjunction with the Mooir Vannin Offshore Wind Farm. As set out in the Shipping and Navigation section of this Planning statement, as the predicted effects results from the addition of Mooir Vannin OWF, no further mitigation is proposed by the Applicant. It is noted that the Mooir Vannin OWF Shipping and Navigation Impact Assessment will be undertaken in line with MCA MGN654 and its 'Methodology for Assessing Marine Navigational Safety and Emergency Response Risks'. It is therefore assumed that, in line with accepted EIA practice, that potential cumulative effects will be considered by Mooir Vannin OWF in its assessment and that they will be considered through its consenting process.

1.5.26.17 The beneficial cumulative effect is as a result of improved energy security during the operations and maintenance phase of the Mona Offshore Wind Project.

1.5.26.18 It is considered that there is no potential for significant transboundary effects to occur on the interests of other EEA States during the construction, operations and maintenance and decommissioning phases of the Mona Offshore Wind Project with respect to human health.

Policy Compliance

1.5.26.19 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on human health.

1.5.27 Inter-related Effects – Onshore

1.5.27.1 This topic is assessed in Volume 3, Chapter 11: Inter-related Effects – Onshore of the Environmental Statement (Document Reference F3.11).

1.5.27.2 Table 1.61 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to inter-related effects (onshore). Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.61: Summary of National Policy Statements relevant to the Inter-related Effects (Onshore) Assessment.

National Policy Statements – Paragraphs relevant to the Inter-related Effects – Onshore Assessment
EN-1
Environmental Effects/Considerations – Secretary of State Decision Making – Paragraph 4.3.19

1.5.27.3 Volume 3, Chapter 11: Inter-related Effects (Onshore) of the Environmental Statement (Document Reference F3.11) has been produced in order to provide consideration of the interrelationship between various effects of the Mona Offshore Wind Project in relation to onshore matters. This assessment satisfies the requirements of **NPS EN-1 paragraph 4.3.19**.

Summary

Summary of Effects

1.5.27.4 The inter-related effects (onshore) assessment of the Mona Offshore Wind Project has considered the potential for inter-related effects to occur on receptor groups as required by NPS EN-1 during its lifetime.

1.5.27.5 For all the receptor groups identified, following the implementation of measures adopted as part of the Mona Offshore Wind Project and any further mitigation (if required), impacts arising during the construction, operations and maintenance and decommissioning phase of the Mona Offshore Wind Project are unlikely to result in significant adverse project-lifetime effects.

1.5.27.6 However, the assessment did identify the potential for significant (moderate) beneficial project-lifetime effect to occur on the following socio-economic receptor groups:

- Employment, GVA, supply chain demand and housing/accommodation/local services demand (further information on these effects is set out in the Socio-economic section of this Planning statement).

Policy Compliance

1.5.27.7 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by inter-related effects (onshore).

1.5.28 Consideration of Alternatives

1.5.28.1 The consideration of alternatives is presented in Volume 1, Chapter 4 (Site selection and alternatives) of the Environmental Statement (Document Reference F1.4) and its associated annexes.

1.5.28.2 Table 1.62 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the consideration of alternatives. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.62: Summary of National Policy Statements relevant to the Consideration of Alternatives Assessment.

National Policy Statements – Paragraphs relevant to the Consideration of Alternatives Assessment
EN-1
Environmental Effects/Considerations – Paragraph 4.3.9
Environmental Effects/Considerations – Applicant Assessment – Paragraph 4.3.15
Environmental Effects/Considerations – Secretary of State Decision Making – Paragraph 4.3.22 and 4.3.23

National Policy Statements – Paragraphs relevant to the Consideration of Alternatives Assessment
Environmental Effects/Considerations – Secretary of State Decision Making – Paragraph 4.3.25 – 4.3.27
Environmental Effects/Considerations – Secretary of State Decision Making – Paragraph 4.3.29
EN-3
Offshore Wind – Applicant Assessment – Paragraph 2.8.119
EN-5
Factors Influencing Site Selection and Design – Paragraphs 2.2.8 to 2.2.10

1.5.28.3 Notwithstanding that **NPS EN-1 paragraph 4.3.9** does not contain a general requirement to consider alternatives or to establish whether a proposed project represents the best option from a policy perspective, Volume 1, Chapter 4, Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4) details the assessments of the reasonable alternatives undertaken as part of the Mona Offshore Wind Project and includes the environmental, social and economic reasons for the preferred choices. Such an approach is required for EIA development in accordance with the EIA Regulations, as recognised by **NPS EN-1 paragraph 4.3.15**.

1.5.28.4 Volume 1, Chapter 4, Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4) sets out in significant detail the approach to and consideration of site selection and alternatives. The chapter considers the array area, the offshore cable route, the landfall site, the onshore cable route and the substation location. All of the main alternatives are considered in a proportionate manner, including responses provided by stakeholders to consultation in accordance with **NPS EN-1 paragraph 4.3.22**.

1.5.28.5 The selection of the Mona Agreement for Lease (AfL) area involved a detailed consideration of key constraints to identify potential locations within the North Wales and Irish Sea Round 4 Bidding Area. The constraints included ecological designations, consideration of other sea users and infrastructure, in particular the Liverpool Bat Traffic Separation Scheme, and a range of other constraints, such as archaeological, aviation and seascape designations.

1.5.28.6 Within the Mona AfL area, as awarded to the Applicant by TCE, further site selection work was undertaken to refine the site to that presented in the DCO application. A significant driver for this refinement was to mitigate potential impacts on shipping and navigation, both prior to and after the PEIR statutory consultation. A number of other factors were also considered in the post-PEIR refinements presented in Volume 1, Chapter 4, Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4).

1.5.28.7 The alternative process brought in a wide area of consideration for the landfall and offshore export cable route, with a number of alternative options considered. A landfall search area between the Penrhyn peninsula and Prestatyn on the north Wales coast was used as a starting point to identify possible landfall locations, with a 16 km stretch of coast presented at in the Scoping Report boundary.

1.5.28.8 The Mona Offshore Wind Project has developed and applied the following site selection and consideration of alternatives principles at the outset of the process in accordance with **NPS EN-1 paragraphs 4.3.9, 4.3.15 and 4.3.22**:

- Shortest route preference to reduce impacts by minimising footprint for the Mona Offshore Cable Corridor and Access Areas and Mona Onshore Cable Corridor as well as considering cost (hence ultimately reducing the cost of energy to the consumer) and minimising transmission losses
- Avoidance of key sensitive features where possible, and where not, ensure mitigation of impacts
- Minimise the disruption to populated areas
- The need to accommodate the range of technology and construction techniques sought within the design envelope.

1.5.28.9 As required by **NPS EN-1 paragraphs 4.3.15 and 4.3.25**, section 4.6.2 of Volume 1, Chapter 4, Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4) contains information about the reasonable spatial and geographical alternatives that have been considered by the Mona Offshore Wind Project, and, where appropriate, presents a comparison of the environmental effects between different options. These include consideration of overhead lines or buried onshore cables; trenchless or trenched techniques for major crossing onshore; and selection of gas insulated or air insulated switchgear for the onshore substation.

1.5.28.10 In addition, alongside the site selection and consideration of alternatives, guiding principles for locating the Project's onshore substation are to achieve an economic and efficient connection (i.e. as close as possible to the National Grid connection point) whilst taking into account environmental and social constraints including siting principles in the Horlock Rules and consideration of Schedule 9 of the Electricity Act 1989. Engineering considerations regarding economy and efficiency include minimising distance as far as is reasonably practicable as it minimises the cable reactive power component and losses.

1.5.28.11 In order to retain consideration of alternatives in a proportionate manner in line with NPS EN-1 paragraphs 4.3.22, 4.3.23, 4.3.26 and 4.3.27, a Black/Red/Amber/Green (BRAG) methodology has been used to inform site selection of onshore infrastructure. BRAG is a standard assessment tool used in the pre-EIA process to assess the potential risks to proposed development options. This is considered appropriate to compare a number of sites for similar onshore infrastructure such as landfall, onshore cable route and onshore substation, given the ability to capture and classify the main differentiating issues in four fundamental categories. A BRAG assessment of this type enables a clear and direct comparison between each site. Each development consideration is given a qualitative classification of Black/Red/Amber/Green. These classifications indicate the adverse or positive attributes to development respectively. It should be noted that if a site is awarded a Red classification, this will not necessarily prevent an option being taken forward as preferred into the next stage if, overall, it performs better than others. A Black classification should remove an option from further consideration.

1.5.28.12 Stakeholder engagement and public consultation is recognised as vitally important for shaping the approach to development as per **NPS EN-1 paragraph 4.3.29**. Early engagement was undertaken with a wide range of stakeholders to refine the process, design and wider spatial constraints and considerations. Consultation on refinements in the Mona Offshore Wind Project site selection, layout and configurations has been undertaken through the informal and formal pre-application stages to date between submitting the Scoping Report (Mona Offshore Wind Ltd, 2022) in May 2022 and submission of the application for Development Consent. The Applicant met with a range of stakeholders to discuss their feedback in more detail and to make any

necessary amendments to the proposed approach ahead of formal consultation on the PEIR, and based on feedback to the PEIR, ahead of submission of the application for Development Consent. Feedback received has been taken into consideration throughout the process.

1.5.28.13 Specifically with regard to alternatives relating to the installation of cable across the intertidal zone as required by **NPS EN-3 paragraph 2.8.119** the selection process for landfall sites is described in section 4.9.4 and section 4.10.4 of Volume 1, Chapter 4, Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4). The Applicant undertook a detailed site selection process to refine the Mona Offshore Wind Project to a single landfall in preparation for application.

1.5.28.14 At the PEIR stage, the terms ‘long’ and ‘short’ drill were used to distinguish relatively between the considered options for the landfall. The ‘short drill’ trenchless technique was proposed to be approximately 350m long and require open cut trenching through the intertidal zone; and the ‘long drill’ trenchless technique was proposed to be approximately 800m long that avoided any open cut trenching in the intertidal zone by locating the exit point below MLWS.

1.5.28.15 The Mona Offshore Wind Project base case at PEIR was to use a trenchless technique for the landfall (to avoid interaction with onshore receptors) but both trenchless (long drill) and open cut (short drill) techniques were retained as options in the PEIR.

1.5.28.16 The Applicant followed robust site selection principles for the landfall location, ensuring:

- Availability of adequate space and site suitability for landfall construction including adequate working areas for cable installation, jointing bays and cable pull-in for trenchless techniques such as HDD, micro-tunnelling and auger boring
- Availability of appropriate site access routes for construction and later operations and maintenance through proximity to existing highways
- Consideration of the suitability of land for trenchless techniques to cross intertidal areas, important coastal habitats and sea defences.

1.5.28.17 Following the identification of the landfall area of search, five zones were identified as areas where the offshore export cables could be brought onshore and where the landfall works to connect to the onshore export cabling could occur. The five options, with associated initial constraints, are described in outline in Table 4.14 and illustrated in Figure 4.13 of Volume 1, Chapter 4, Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4).

1.5.28.18 A shortlisting exercise, including a detailed analysis comprising land, engineering, environmental and consents reviews was undertaken. Two specific locations within the Llanddulas zone were identified. Following informal consultation and receipt of the Scoping Opinion in June 2022 (Document Reference J8), a further technical analysis and environmental and consenting review was undertaken of the Llanddulas landfall options. Further analysis was also undertaken for the potential onshore cable routes associated with each landfall option, to understand potential constraints and risks which may further influence the balance of landfall options. As a result, the Llanddulas landfall (at Pensarn Beach) was progressed for the PEIR.

1.5.28.19 Consultation feedback received from the PEIR consultation and regular Onshore Ecology EWGs stated that the NRW preference was to reduce or remove any potential interaction with the intertidal area to reduce the potential direct impact on the Traeth

Pensarn SSSI and intertidal habitats, and to reduce the potential activity on the beach to support the trenchless techniques (including access to these areas). A design decision was made to commit to no above-ground works through the intertidal area, and to commit to a trenchless technique that would achieve this with an exit point below MLWS and therefore the Mona Offshore Wind Project will not be installing cables across the intertidal zone at the landfall.

1.5.28.20 Turning to the location of the Onshore Substation as required by **NPS EN-5 paragraphs 2.2.8 and 2.2.9**, the siting process is again described within Section 4.8 of the Site Selection and Consideration of Alternatives of the Environmental Statement chapter (Document Reference F1.4).

1.5.28.21 As mentioned above, a BRAG methodology was used to inform site selection and consideration of alternatives. Development considerations captured within the BRAG assessment included archaeology/cultural heritage, ecology, landscape, hydrology and hydrogeology, engineering, community, landscape and visual, property and planning. Landscape considerations for the BRAG assessment were based on criteria for judging landscape capacity and sensitivity, for example proximity to valued landscapes, landscape character susceptibility, visual sensitivity/presence of visual receptors and opportunities to utilise existing features (such as woodlands) for screening and mitigation. This approach took account of the siting principles in the Horlock Rules and considered Schedule 9 of the Electricity Act 1989 in accordance with **NPS EN-5 paragraph 2.2.10**.

1.5.28.22 Micro-siting suggestions for the Onshore Substation were also reviewed against consultation responses. Based on input from the multidisciplinary Mona Onshore Wind Project team and stakeholder engagement, it was decided that the proposed Onshore Substation immediately south of the National Grid Bodelwyddan Substation (Onshore Substation Option 2 in the PEIR) offered the most appropriate option for the siting of the Mona Offshore Wind Project Onshore Substation.

1.5.28.23 This included consideration of Statutory Consultation feedback, technical input including onshore substation construction layouts, platform layouts and onshore cable route options, ongoing ecological and archaeological surveys, landowner feedback and EIA / Engineering / Land BRAG assessment criteria that focussed on the potential to screen the final location using existing woodland blocks and the local topography. Following this decision further refinements were made to take account of specific features and constraints surrounding the Onshore Substation location and to orient the Onshore Substation accordingly.

Other Policy Considerations

1.5.28.24 Table 1.63 below lists other national policy considerations relevant to the consideration of alternatives.

Table 1.63: Summary of Other National Policy Considerations relevant to the consideration of alternatives.

Welsh National Marine Plan: Policies relevant to the consideration of alternatives
Sector Policy - Subsea Cabling (CAB_01, paragraph 449)

1.5.28.25 As stated above, the selection process for landfall sites is described in Section 4.8 of Volume 1, Chapter 4, Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4). As part of this process, and as

required by **Policy CAB_01 of the WNMP**, consideration was given to whether it would be possible to utilise an existing landfall site.

1.5.28.26 The Applicant followed robust site selection principles for the landfall location, ensuring:

- Availability of adequate space and site suitability for landfall construction including adequate working areas for cable installation, jointing bays and cable pull-in for trenchless techniques such as HDD, micro-tunnelling and auger boring
- Availability of appropriate site access routes for construction and later operations and maintenance through proximity to existing highways
- Consideration of the suitability of land for trenchless techniques to cross intertidal areas, important coastal habitats and sea defences.

1.5.28.27 Following the identification of the landfall area of search, five zones were identified as areas where the offshore export cables could be brought onshore and where the landfall works to connect to the onshore export cabling could occur. The five options, with associated initial constraints, are described in outline in Table 4.14 and illustrated in Figure 4.13 of Volume 1, Chapter 4, Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4).

1.5.28.28 A shortlisting exercise, including a detailed analysis comprising land, engineering, environmental and consents reviews was undertaken. The summary of this workshop is presented in Table 4.15. Two specific locations within the Llanddulas zone were identified. Following informal consultation and receipt of the Scoping Opinion in June 2022, a further technical analysis and environmental and consenting review was undertaken of the Llanddulas landfall options. Further analysis was also undertaken for the potential onshore cable routes associated with each landfall option, to understand potential constraints and risks which may further influence the balance of landfall options. As a result, the Llanddulas landfall (at Pensarn Beach) was progressed.

Summary

Summary of Effects

1.5.28.29 As set out above and explained in further detail in Volume 1, Chapter 4, Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4), the Mona Offshore Wind Project has undertaken the site selection process in accordance with the requirements of NPS EN-1, NPS EN-3, NPS EN-5 and the WNMP.

1.5.28.30 This began with early engagement with a range of stakeholders with the aim being to identify sites and routes that are environmentally acceptable, deliverable and capable of being granted consent, whilst also enabling the benefits in the long term of the lowest energy cost to be passed to the consumer. The process took account of environmental, physical, technical, commercial, and social considerations and opportunities as well as engineering requirements. Each stage of the site selection process formed part of an iterative design process undertaken to identify the most suitable locations and configuration for the Mona Offshore Wind Project infrastructure.

1.5.28.31 The site selection and consideration of alternatives for the Mona Offshore Wind Project has therefore took account of all identified material planning policy matters, as well as

the Habitats Regulations, the Horlock Rules and Schedule 9 of the Electricity Act. As such there is no conflict with any of the requirements of the NPSs or the WNMP.

Policy Compliance

1.5.28.32 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the assessment of alternatives.

1.5.29 Good Design

1.5.29.1 The design considerations are presented in Volume 1, Chapter 4 (Site selection and alternatives) of the Environmental Statement (Document Reference F1.4) and in the Design Principles document (Document Reference J3).

1.5.29.2 Table 1.64 below includes a list of paragraphs within the relevant NPSs that are considered relevant to good design. Those paragraphs are set out in full in the NPS Tracker (Document Reference J2.1). The NPS Tracker also sets out in detail how the Mona Offshore Wind Project has addressed the requirements of the relevant NPS paragraphs.

Table 1.64: Summary of National Policy Statements relevant to Good Design.

National Policy Statements – Paragraphs relevant to Good Design
EN-1
Criteria for Good Design for Energy Infrastructure – Applicant Assessment – Paragraph 4.7.2
Criteria for Good Design for Energy Infrastructure – Applicant Assessment – Paragraphs 4.7.6 and 4.7.7
Criteria for Good Design for Energy Infrastructure – Secretary of State Design Making – Paragraph 4.7.12
Landscape and Visual – Paragraph 5.10.6 and 5.10.7
EN-3
Consideration of Good Design for Energy Infrastructure – Paragraph 2.5.2
Flexibility in Project Details – Paragraph 2.8.74

1.5.29.3 The Mona Offshore Wind Project has undertaken a design process that has sought, as far as practicable, to develop a design that minimises effects to the receiving environment in accordance with **NPS EN-1 paragraph 5.10.6**. This has included an iterative approach that has been applied throughout the pre-application process. This approach accords with **NPS EN-1 paragraphs 4.7.2 and 4.7.7** and as required, the design decisions in terms of Mona Offshore Wind Project infrastructure and locations are set out in Volume 1, Chapter 4: Site selection and consideration of alternatives (Document Reference F1.4).

1.5.29.4 Further design considerations of relevance to the onshore design are set out in the Design Principles document (Document Reference J3) which describes layouts, landscaping and the appearance of the proposed permanent above ground infrastructure (i.e. the Onshore Substation). Additional detail of the potential reinstatement of the onshore cable route and screening proposals for the Onshore Substation can be found in the Outline Landscape and Ecological Management Plan (OLEMP) (Document Refence J22) in accordance with **NPS EN-1 paragraph 4.7.6**.

1.5.29.5 With regard to offshore design, the Mona Offshore Wind Project has been designed, as far as reasonably practicable, to apply good design including seeking to site turbines

in an area that seeks to reduce visual effects, avoiding placement of turbines within the Liverpool Bay SPA, whilst also complying with the necessary safety requirements with respect to safe navigation and operation of Search and Rescue procedures.

1.5.29.6 Further design refinements, such as reducing turbine height or altering colour are not considered feasible due to the flexibility needed because of the uncertainty in technological advances, as recognised in **NPS EN-3 paragraph 2.8.74**, or due to other considerations such as operational safety which requires the turbines to be appropriately marked and painted to comply with navigational safety requirements as recognised by **NPS EN-1 paragraph 4.7.12**.

1.5.29.7 With regard to careful design, in accordance with **NPS EN-1 paragraphs 5.10.7 and 5.10.32 and NPS EN-3 paragraph 2.5.2**the Onshore Substation has been sited outside any designated areas such as National Parks or NLs. The site selection process as explained in Volume 1, Chapter 4: Site selection and consideration of alternatives (Document Reference F1.4) confirmed that the final Onshore Substation location would minimise the effects on the special qualities of any areas designated for visual amenity.

1.5.29.8 The sensitivity of the landscape and visual receptors in the LVIA study area has been a key consideration in the siting and design of the onshore infrastructure. A detailed consideration and assessment of the capacity of the landscape to accommodate the onshore infrastructure in relation to the screening afforded by the existing landforms, trees and hedgerows between sensitive receptors and the Mona Offshore Wind Project infrastructure has been undertaken in Volume 3, Chapter 6 Landscape and visual resources (Document Reference F3.6).

1.5.29.9 Additional landscape mitigation measures for the Onshore Substation are also described in Volume 3, Chapter 6 Landscape and visual resources (Document Reference F3.6) with further detail provided in the OLEMP (Document Refence J22). Mitigation measures include:

- Woodland planting
- Earth modelling
- Enhancement of existing hedgerow and creation of new hedgerows.

1.5.29.10 Photomontage visualisations showing predicted views of the Onshore Substation are shown without mitigation and with the landscape mitigation at 15 years post-planting in Volume 7, Annex 6.5 Landscape visualisations (Document reference F7.6.5).

1.5.29.11 Turning to careful design in relation to offshore infrastructure, the turbines and other infrastructure have been sited, as far as reasonably practical, to avoid and minimise significant effects on the special qualities of the NLs within the zone of theoretical visibility. A detailed consideration and assessment of the capacity of the seascape to accommodate the offshore infrastructure in the context of the existing baseline, characterised in many respects by the presence of other offshore wind farm projects, has been undertaken Volume 2, Chapter 2, Chapter 8 Seascape and visual resources (Document Reference F2.8)

1.5.29.12 Also, in accordance with **NPS EN-3 paragraph 2.5.2 c**o-existence with other marine users and infrastructure is considered in Volume 2, Chapter 10: Other sea users of the Environmental Statement (Document Reference F2.10). Opportunities for co-location of the onshore infrastructure have been limited by the outcome of the Holistic Network Design process which resulted in the National Grid Electricity System Operator concluding that the preferred connection option representing the most optimal design,

considering all criteria, for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan National Grid Substation.

1.5.29.13 A range of measures have been embedded into the design of the Mona Offshore Wind Project to mitigate impacts and effect. These are outlined throughout the various topic chapters of the Environmental Statement and set out in the Mitigation and Monitoring Schedule (Document Reference J10).

Other Policy Considerations

1.5.29.14 Table 1.65 below lists other national policy considerations relevant to good design.

Table 1.65: Summary of Other National Policy Considerations relevant to Good Design.

PPW11 – Policies relevant to Good Design
Good Design Making Better Places - Paragraph 3.8
Design and Access Statements - Paragraph 3.17
Technical Advice Notes – Policies relevant to Good Design
TAN 12: Design

1.5.29.15 Table 1.66 below lists other local policy considerations relevant to good design.

Table 1.66: Summary of Other Local Policy Considerations relevant to Good Design.

Denbighshire County Council Local Development Plan – Policies relevant to Good Design
Policy RD 1 – Sustainable development and good standard design
Conwy County Borough Council Local Development Plan – Policies relevant to Good Design
Policy DP/3 – Promoting Design Quality and Reducing Crime

1.5.29.16 As set out above in relation to the relevant requirements of the NPSs in relation to good design, the Mona Offshore Wind Project has undertaken a design process that has sought, as far as practicable, to develop a design that minimises effects to the receiving environment in accordance with **PPW11 paragraph 3.8**. The Project's design decisions are set out in Volume 1, Chapter 4: Site selection and consideration of alternatives (Document Reference F1.4) and a Design Principles document (Document Reference J3) has been produced in accordance with **PPW11 paragraph 3.17** and **TAN12**.

1.5.29.17 Similarly, the Mona Offshore Wind Project's approach to good design as set out above accords with the requirements of **Policy RD1 of the Denbighshire LDP** and **Policy DP/3 of the Conwy LDP**.

Summary

Summary of Effects

1.5.29.18 Good design has been considered throughout the evolution of the Mona Offshore Wind Project and has been incorporated into the site selection, design evolution and set out in the mitigation proposals included in the application.

1.5.29.19 The Mona Offshore Wind Project has undertaken a design process that has sought, as far as practicable, to develop a design that minimises effects to the receiving environment. This has included an iterative approach that has been applied throughout the pre-application process as set out in Volume 1, Chapter 4: Site selection and consideration of alternatives (Document Reference F1.4).

1.5.29.20 Further design considerations of relevance to the onshore design are set out in the Design Principles document (Document Reference J3) which describes layouts, landscaping and the appearance of the proposed permanent above ground infrastructure (i.e. the Onshore Substation). Additional detail of the potential reinstatement of the onshore cable route and screening proposals for the Onshore Substation are described in the Outline Landscape and Ecological Management Plan (Document Refence J22).

1.5.29.21 A range of measures have been embedded into the design of the Mona Offshore Wind Project to mitigate impacts and effect. These are outlined throughout the various topic chapters of the Environmental Statement and set out in the Mitigation and Monitoring Schedule (Document Reference J10).

Policy Compliance

1.5.29.22 Accordingly, in terms of good design, the Mona Offshore Wind Project is considered to comply with NPS EN-1 and NPS EN-3, PPW11 and the relevant policies of the Conwy and Denbighshire LDPs.

1.5.29.23 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the consideration of good design.

1.6 Balance of Considerations and Overall Conclusions

1.6.1 Overview

1.6.1.1 This Planning statement has set out the background to and the context of the Mona Offshore Wind Project as well as the legal and policy framework it should be assessed against. It includes a description of the need for the Mona Offshore Wind Project and its benefits and the outcome of the environmental assessment work including both beneficial and adverse effects.

1.6.1.2 Section 104(3) of the Planning Act 2008 outlines that the SoS should decide applications in accordance with relevant NPSs with the fundamental test to be applied in the decision-making process being whether, on balance, the Mona Offshore Wind Project is in accordance with the relevant NPSs.

1.6.1.3 This statement is intended to assist the determination of the application. In particular this section summarises the need for the Mona Offshore Wind Project, its wider benefits and weighs those against the potential adverse effects identified through the detailed environmental assessment work that has been undertaken.

1.6.1.4 This balancing exercise also considers the context of national, UK and European policies and obligations that seek to tackle climate change, deliver security of the UK's energy supply and promote the necessary shift to renewable energy as well as accordance with Welsh national and local planning policy.

1.6.2 Mona Offshore Wind Project Need

1.6.2.1 As established in section 1.4 of this Planning statement, the Mona Offshore Wind Project would make a significant contribution to meeting national need, in accordance with policy set out in Part 3 of NPS EN-1.

1.6.2.2 From a national policy context, the need for the Mona Offshore Wind Project, and offshore wind in general, is confirmed by NPS EN-1, with increased support confirmed in NPS EN-3.

1.6.2.3 Part 3 of NPS EN-1 outlines the urgent need for all types of energy infrastructure in order to achieve energy security and dramatically reduce GHG emissions (paragraphs 3.1.1 and 3.3.63).

1.6.2.4 When determining applications for offshore wind this should be done on the basis that the Government has demonstrated that there is a need for this type of infrastructure and subsequently substantial weight should be given to the contribution these projects would make towards satisfying this need

1.6.2.5 In particular, paragraph 3.3.62 of NPS EN-1 states that the Government "… has concluded that there *is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure*" including offshore wind.

1.6.2.6 Part 3 also explains that, without significant amounts of new large-scale energy infrastructure, the Government's energy and climate change objectives cannot be fulfilled and this will not be possible without some significant residual adverse impacts (paragraph 3.1.2).

1.6.2.7 Whilst there is a general presumption in favour of consenting NSIPs based on the UK Government's assessment of the need for electricity generating capacity, the NPSs designated in January 2024 now include a strengthened presumption specifically in relation to critical national priority (CNP) infrastructure.

1.6.2.8 Paragraphs 3.3.62 and 4.2.4 of NPS EN-1 confirm that the Government "… has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure."

1.6.2.9 Importantly, in relation to CNP Infrastructure, paragraph 3.3.63 of NPS EN-1 reaffirms the Government's approach to addressing the urgent need for such projects, like the Mona Offshore Wind Project, and goes further by stating "*Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible*." (our underlining).

1.6.2.10 The strengthened presumption in favour of CNP infrastructure also confirms that "where non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure" and " … in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts." (paragraph 4.2.16).

1.6.2.11 In this regard NPS EN-1 that the starting point for decision making is that CNP infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality, or very special circumstances. This includes development affecting SSSIs, development in nationally designated landscapes and where there is

substantial harm to or loss of significance to heritage assets (paragraphs 4.2.16 and 4.2.17).

1.6.2.12 This need is further confirmed in wider international and national governmental obligations and objectives relating to low carbon electricity generation, climate change and the economy including the CoP Glasgow Climate Pact 2021, the UK Climate Change Act 2008, the UK Government Energy Security Statement (April 2022), the Environment (Wales) Act 2016, the Welsh Net Zero Plan (2021) and Energy Generation in Wales 2021.

1.6.2.13 Further, it has recently been re-enforced by agreements made at COP 28 in November 2023 whereby the Global Renewables and Energy Efficiency Pledge, with endorsement from 130 national governments, now stipulates that signatories commit to work together to triple the world's installed renewable energy generation capacity to at least 11,000 GW by 2030.

1.6.2.14 Generally, the Mona Offshore Wind Project:

- As an offshore wind project, contributes towards the types of energy infrastructure confirmed as needed in NPS EN-1 and EN-3 in order for the UK to decarbonise its economy and achieve energy security and Net Zero
- Is confirmed as being low carbon energy infrastructure that the Government has concluded is a critical national priority (CNP) in terms of both generation and transmission as confirmed by paragraphs 3.3.62 and 4.2.5 of NPS EN-1, paragraphs 2.1.7 and 2.1.8 of NPS EN-3 and paragraph 2.12.7 of NPS EN-5
- Contributes substantially towards the recognised urgent need in the UK for new CNP low carbon energy infrastructure '*to be brought forward as soon as possible*' (NPS EN-1 paragraph 3.3.58)
- Makes a contribution towards the UK's part in meeting the revised recently agreed COP 28 Global Renewables and Energy Efficiency Pledge to triple the world's installed renewable energy generation capacity by 2030
- Contributes towards the British Energy Security Strategy's recently revised target of 50 GW of offshore wind by 2030 set out in the UK Government's 2022 Energy Security Statement
- Assists in meeting the UK Government's revised target in the Climate Change Act of 'net zero' greenhouse gas emissions for the year 2050 (i.e. to be 100% lower than the 1990 levels) in order to meet its obligations under international climate change agreements
- Similarly, assisting in meeting the Environment (Wales) Act aim to reduce emissions by 100% by 2050
- Assists in meeting future increases in electricity demand as significant sectors of energy demand switch from being powered by fossil fuels to using electricity.

1.6.2.15 Specifically in relation to need, NPS EN-1 confirms that the Mona Offshore Wind Project should be considered on the basis that the Government has demonstrated that there is a need for renewable energy infrastructure, that the scale of the need is significantly in excess of what is currently being promoted and that the need for renewable energy is urgent (paragraphs 3.1.1, 3.2.6 and 3.5.58 of EN-1).

1.6.2.16 Furthermore, as recently emphasised in the newly designated NPSs, this urgent need for low carbon energy infrastructure, such as the Mona Offshore Wind Project, is a critical national priority (CNP) (paragraph 3.3.62 of NPS EN-1).

1.6.2.17 Accordingly, substantial weight should be given to the contribution which the Mona Offshore Wind Project would make towards satisfying this need (paragraph 3.2.7 of EN-1).

1.6.2.18 Importantly, in relation to CNP Infrastructure, paragraph 3.3.63 of NPS EN-1 not only stresses the urgent need for such projects by confirming that the need '*will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy*' and reiterates that the Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.

1.6.3 Mona Offshore Wind Project Benefits

1.6.3.1 The benefits of the Mona Offshore Wind Project in terms of meeting the urgent need for energy generation identified above are set out in this section.

1.6.3.2 Construction of the Mona Offshore Wind Project is intended to commence in 2026, and the Mona Offshore Wind Project is intended to be fully operational by 2030 in order to provide an important contribution to the UK Government's renewable energy targets.

1.6.3.3 When operational the Mona Offshore Wind Project will generate over 350 MW of renewable energy thereby making a substantial contribution to the delivery of the 50 GW of renewable energy that the UK Government is aiming to be provided by offshore wind by 2030 as set out in the April 2022 UK Government Energy Security Statement.

1.6.3.4 Resultant reductions in carbon dioxide emissions will contribute to meeting global, European and national targets on carbon dioxide (CO2) reduction in line with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 and the CoP Glasgow Climate Pact 2021 which has recently re-enforced by agreements made at COP 28 whereby the Global Renewables and Energy Efficiency Pledge commits 130 national governments to work together to triple the world's installed renewable energy generation capacity by 2030.

1.6.3.5 The climate change assessment into the Mona Offshore Wind Project confirms that it would enable the use of excess renewable electricity (avoiding generation curtailment) and the displacement of fossil fuels which would be a positive GHG effect, such that, when considering the avoided emissions, in addition to operations and maintenance emissions, the effect results in the order of approximately 2,296,671 tCO2e savings by 2064. This would be a significant beneficial effect and provide a substantial contribution towards the above-mentioned targets.

1.6.3.6 In more contextual terms, the Mona Offshore Wind Project would generate enough renewable electricity in year one to power over 1.3 million households across England and Wales and, in overall terms would meet approximately 35% of the Wales' annual domestic electricity consumption per annum, thereby making a significant contribution towards Wales' target of 100% renewables by 2050 set by the Environment (Wales) Act, and the policy target in Policy 24 of Future Wales for 70% of electricity consumption to be generated from renewable energy by 2030.

1.6.3.7 In addition to the energy-related benefits set out above, the Mona Offshore Wind Project also has numerous other benefits.

1.6.3.8 In terms of **socio-economic benefits**, generally the Low Carbon Transition Plan (2009) and the UK Government Carbon Budgets 2016 are driven by policies and UK Government initiatives to support the development of renewable energy in the UK, Europe and further afield based upon recognition of the need to transition to low carbon economies. The Mona Offshore Wind Project will clearly make a significant contribution towards this much needed transition to low carbon economies.

1.6.3.9 More specifically in respect of effects of the Mona Offshore Wind Project, the scale of beneficial economic impacts could vary depending on which port location is selected to support either or both of the construction and operations and maintenance phases of the Project.

1.6.3.10 If a port in north Wales is selected to support the Mona Offshore Wind Project it is estimated it could:

- Support 350 jobs and £46 million in GVA during construction the within north Wales
- And for the operations and maintenance phase, provide long term economic impacts (35 years) of 190 jobs generating £25 million in GVA per annum.

1.6.3.11 If a port in northwest England is selected to support the Mona Offshore Wind Project it is estimated it could:

- support 890 jobs and £85 million in GVA within northwest England
- and for the operations and maintenance phase, provide long term economic impacts (35 years) of 220 jobs generating £25 million in GVA per annum.

1.6.3.12 The above benefits will also provide wider social beneficial effects such as increased employment opportunities for local residents, local businesses, accommodation, and tourism, especially in relation to increased use of local accommodation and businesses during the off-peak season.

1.6.3.13 Based on assumptions regarding UK content of the Mona Offshore Wind Project expenditure, which draw on previously delivered offshore windfarms in the UK, it is estimated the Project's activities within the UK could support 9,380 jobs and £675 million in GVA.

1.6.3.14 In terms of **human health**, there will be no significant adverse effects arising from the Mona Offshore Wind Project whereas significant benefits in relation to energy security are expected during operational phase. Furthermore, in a cumulative context, wider societal infrastructure and resources in relation to renewable energy generation are expected to have a significant beneficial effect.

1.6.3.15 The Mona Offshore Wind Project also intends to produce and implement a Biodiversity Management Strategy. The mechanisms through which the Mona Offshore Wind Project intends to achieve **overall biodiversity benefit** are presented in the Biodiversity Benefit and Green Infrastructure Statement (Document Reference J7).

1.6.3.16 The Applicant has identified a number of opportunities within the Irish Sea which could deliver additional intertidal and offshore biodiversity benefits, including:

- Increases to the productivity of breeding seabirds
- Biodiversity enhancing cable protection
- Artificial reef blocks
- Restoration of fish and shellfish habitats outside of protected sites
- In addition, the Applicant has confirmed that the site induction processes will incorporate the principles of the WiSe training scheme (or other similar scheme) to ensure that key personnel are aware of the need to minimise disturbance to marine life during the construction and operations and maintenance phase.

1.6.3.17 The Applicant has also identified several opportunities to improve onshore biodiversity through the Biodiversity Benefit and Green Infrastructure Statement (Document

Reference J7) and the Outline Landscape and Ecology Management Plan (Document Reference J22). These include:

- Hedgerow enhancements
- The creation of woodland belts to improve habitat connectivity
- Tree planting
- The creation of species rich hedgerows and areas of grassland, scrub, wildflowers and ponds to provide habitats of conservation interest.

1.6.3.18 The Applicant will continue to explore these opportunities as the Mona Offshore Wind Project design develops, in collaboration with stakeholders post-consent.

1.6.3.19 Also, in terms of **biodiversity**, Table J2.1.1 in the NPS Tracker (Document Reference J2.1) sets out how the Mona Offshore Wind Project would contribute to the targets set in the Environment Act 2021.

1.6.3.20 The Mona Offshore Wind Project will also have beneficial effects with regard to **marine archaeology** as a result of future geophysical and geotechnical surveys potentially uncovering new archaeological data. Similarly, in terms of **traffic and transport**, the retention of one of the temporary accesses as confirmed in the Outline Highways Access Management Plan (Document Reference J26.16) will result in improved turning ability and will provide a long-term highway safety benefit on the A547 Abergele Road.

1.6.4 Consideration of the Planning Balance

1.6.4.1 The Mona Offshore Wind Project's compliance with relevant planning policy, primarily NPS EN-1, EN-3, and EN-5 but also relevant Welsh national policy within the WNMP, Future Wales and PPW11, as well as relevant local policy, has been demonstrated throughout section 1.5 of this Planning statement in relation to each specific topic.

1.6.4.2 Further detail on the Project's compliance with the NPSs and other relevant policy is set out in the individual chapters of the Environmental Statement and other relevant supporting application documents and the NPS Tracker (Document Reference J2.1) in particular, confirms in detail how the Mona Offshore Wind Project accords with NPS EN-1 and EN-3, and EN-5.

1.6.4.3 Section 1.5 of this Planning statement confirms that the construction, operations and maintenance and decommissioning of the **Mona Offshore Wind Project alone** will not result in any significant adverse effects in relation to:

- Physical processes
- Benthic subtidal and intertidal ecology
- Offshore ornithology
- Commercial fisheries
- Marine archaeology
- Other sea users
- Geology and hydrogeology
- Hydrology and flood risk, water quality and resources
- Onshore and intertidal ornithology

- Onshore ecology
- Seascape and visual resources
- Land use and recreation
- Traffic and transport
- Noise and vibration
- Air quality
- Aviation and radar
- Climate change
- Socio-economics
- Human health
- Inter-related effects both offshore and onshore.

1.6.4.4 The only potentially significant adverse effects identified as a result of the Mona Offshore Wind Project relate to:

- Landscape and visual resources whereby all effects would only be temporary and localised in extent, with the effects during operations and maintenance lessening as the landscape proposals in the Outline Landscape and Ecological Management Plan (Document Reference J22) establish, such that by Year 15 no significant visual effects are predicted
- Fish and shellfish whereby the only effect on herring spawning off the coast of the Isle of Man. In order to mitigate this effect, the Mona Offshore Wind Project has committed to the development of an Underwater Sound Management Strategy (UWSMS), an outline version of which included as Document Reference J16, which will reduce effects to a non-significant level. The detailed UWSMS will be developed and agreed with stakeholders post-consent
- Marine mammals where the only effect is in relation to elevated underwater sound during UXO clearance for harbour porpoise. Again, the proposed mitigation, in the form of the outline UWSMS (Document Reference J16), the outline Marine Mammals Management Protocol (MMMP) (Document Reference J21) and the Measures to Minimise Disturbance to Marine Mammals and Rafting Birds from Transiting Vessels document (Document Reference J17) will ensure that all such effects are appropriately mitigated to a non-significant level
- Shipping and navigation where the effect on adverse weather routeing for some ferry services (Stena Line between Liverpool and Belfast and Isle of Man Steam Packet Company between Liverpool and Douglas) could be significant. Following the identification of the effect, the Applicant made substantial commitments to reduce them, including reduction in the Mona Array Area and additional control measures. Despite this, the assessment has concluded that a significant effect in relation to adverse weather routing remains and, as such, the Applicant has committed to engaging with affected stakeholders with this engagement intended to continue beyond submission of the application and run in parallel with the application determination process
- Historic environment, whereby effects on the setting of the Grade II listed building Pentre Meredydd. would either be temporary, relating to construction, or the landscape planting scheme proposed around the Onshore Substation site as set

out the Outline LEMP (Document Reference J22) would over time, reduce the operations and maintenance effect such that it would no longer be significant

- Recreational use, although the effects on the Wales Coast Path and NCR 5 will be temporary during the construction phase only.

1.6.4.5 In relation to **cumulative effects** the only potentially significant adverse effects are in relation to:

- Benthic subtidal and intertidal ecology where potentially significant effects in the short to medium term relating to temporary habitat disturbance/loss are predicted to decrease to be non-significant in the long term
- Fish and shellfish where the only effect is the potential for underwater sound effects in relation to herring and cod spawning. However, as above, the Project's commitment to a UWSMS (Document Reference J16) will reduce sound levels so as to effects to a non-significant level
- Marine mammals where there is potential for significant effects as a result of behavioural disturbance during piling for bottlenose dolphin. There is also potential for a reduction in lifetime reproductive success to bottlenose dolphin and a possible reduction in size of a declining ISMU population. The other potential effect is from injury from UXO clearance for harbour porpoise along with a small number of individuals potentially being exposed to sound levels that could elicit permanent auditory injury. However, the measures adopted by the Mona Offshore Wind Project which include the development of a detailed UWSMS (an outline UWSMS is included as Document Reference J16), the outline MMMP (Document Reference J21) and the Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels document (Document Reference J17), will ensure that all such effects are appropriately mitigated to a non-significant level
- Shipping and navigation where, following the identification of significant cumulative effects on commercial operators including strategic routes and lifeline ferries within the PEIR, the Applicant made substantial commitments to reduce these effects, including a reduction to the Mona Array Area and additional control measures. Similar commitments made by the Morgan Generation Assets Project and the Morecambe Generation Assets Project have further contributed to a reduction of this predicted effect. Notwithstanding this, it has been confirmed that whilst routes between the three array areas and existing offshore wind farms would be created which could increase the risk of collision and allision, the risks are judged to be ALARP and manageable via operational procedures
- Shipping and navigation whereby taking account of the Mooir Vannin OWF which could result in a reduction in searoom for the routes, the cumulative effect on risks of collision and allision is considered to be significant. As the predicted effect results from the addition of Mooir Vannin OWF, no further mitigation is proposed by the Applicant. It is noted that the Mooir Vannin OWF Limited (2023) Shipping and Navigation Impact Assessment will be undertaken in line with MCA MGN654 and its 'Methodology for Assessing Marine Navigational Safety and Emergency Response Risks'. It is therefore assumed that, in line with accepted EIA practice, potential cumulative effects will be considered by Mooir Vannin OWF in its assessment and that they will be considered through its consenting process

- Whilst a potentially significant cumulative effect has been noted in the assessment of the Mona Array Area on the setting of terrestrial designated historic assets, it is considered that the Mona Offshore Wind Project's contribution to the effect is minor adverse, which is not significant in EIA terms. Rather, it is the contribution of other offshore wind projects, such as the consented Awel y Môr project, the Environmental Statement for which concluded a moderate adverse effect for Awel y Môr alone in respect of one of the relevant historic assets. Accordingly, due to this and Awel y Môr's closer proximity to the shore, it is considered that Awel y Môr provides the greatest contribution to the assessed cumulative significant effects.

1.6.4.6 The Mona Offshore Wind Project will have no significant adverse **transboundary effects.**

1.6.5 Overall Conclusion

1.6.5.1 Part 3 of NPS EN-1 outlines the urgent need for all types of energy infrastructure in order to achieve energy security and dramatically reduce GHG emissions.

1.6.5.2 Paragraph 3.3.62 of NPS EN-1 however confirms that the Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure such as the Mona Offshore Wind Project.

1.6.5.3 In making decisions, NPS EN-1 paragraph 4.1.3 confirms that the decision maker should start with a presumption in favour of granting consent to applications for energy projects unless more specific polices set out in relevant NPSs clearly indicate that consent should be refused or the adverse impacts will outweigh the benefits, with paragraph 4.1.5 setting out that when weighing its adverse impacts against its benefits, the decision maker should take into benefits including:

- Contribution to meeting the need for energy infrastructure
- Job creation
- Environmental enhancements, all of which the Mona Offshore Wind Project provides.

1.6.5.4 The decision maker should weigh these against potential adverse effect, whilst taking into account any measures to avoid, reduce, mitigate or compensate for any adverse impacts.

1.6.5.5 Importantly, in relation to CNP Infrastructure, however, paragraph 3.3.63 of NPS EN-1 confirms that the urgent need for CNP Infrastructure to achieve energy objectives and national security, economic, commercial, and net zero benefits, will generally outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy.

1.6.5.6 It also confirms that the UK Government strongly supports the delivery of CNP infrastructure and it should be progressed as quickly as possible.

1.6.5.7 The need for the Mona Offshore Wind Project is therefore clearly supported by NPS EN-1, in addition to the wider governmental and international obligations and objectives relating to low carbon electricity generation, climate change and the economy.

1.6.5.8 Starting with the strong support and presumption in favour set out in NPS EN-1 and taking account of the benefits that the Mona Offshore Wind Project will provide as set

out above, there is a requirement to weigh against these the limited number of potential adverse effects that have also been identified.

1.6.5.9 As confirmed above, under the majority of onshore and offshore topics assessed, there would be no significant effects from the Mona Offshore Wind Project, or where potential effects have been identified, it has been confirmed that these can be appropriately mitigated such that they are not significant.

1.6.5.10 Accordingly, there are no potential adverse effects that cannot be mitigated or that outweigh the benefits associated with the Mona Offshore Wind Project, the urgent need and strong support and presumption in favour for it as CNP infrastructure.

1.6.5.11 Therefore, the Mona Offshore Wind Project clearly accords with UK Government policy contained within the recently published NPS EN-1, NPS EN-1 and NPS EN-5. Furthermore, it has been demonstrated that the Mona Offshore Wind Project also complies with Welsh national policy within the WMNP, Future Wales and PPW11, as well as with local planning policy in the relevant authority areas of Conwy and Denbighshire.

1.6.5.12 Therefore, under the terms of S104 PA2008, consent for the Mona Offshore Wind Project should be granted.

1.7 References

Climate Change Act (2008)

Climate Change Committee (2015) 'Reducing emissions and preparing for climate change: 2015 Progress Report to Parliament'

Climate Change Committee (2016) 'Progress report 2016: meeting carbon budgets'

Climate Change Committee (2019) 'Net Zero – The UK's contribution to stopping global warming'

Climate Change Committee (2020) 'Reducing UK emissions: 2020 Progress Report to Parliament'

Conwy County Borough Council (2013) 'Local Development Plan 2007 – 2022'

Conwy County Borough Council (2014a) 'Supplementary Planning Guidance: LDP6 – The Welsh Language'

Denbighshire County Council (2013) 'Local Development Plan 2006 – 2021'

Denbighshire County Council (2014) 'Supplementary Planning Guidance Note: Planning and the Welsh Language'

Department of Energy Security and Net Zero (2020) 'The ten point plan for a green industrial revolution'

Department of Energy Security and Net Zero (2021) 'Net Zero Strategy: Build Back Greener'

Department of Energy Security and Net Zero (2022) 'British energy security strategy'

Department for Energy Security & Net Zero (2024a) Overarching National Policy Statement for Energy (NPS EN-1). Available: https://assets.publishing.service.gov.uk/media/65a7864e96a5ec0013731a93/overarching-nps-for-energy-en1.pdf. Accessed February 2024.

Department for Energy Security & Net Zero (2024b) National Policy Statement for Renewable Energy Infrastructure (NPS EN-3). Available: https://assets.publishing.service.gov.uk/media/65a7889996a5ec000d731aba/nps-renewable-energy-infrastructure-en3.pdf. Accessed February 2024.

Department for Energy Security & Net Zero (2024c) National Policy Statements for Electricity Networks Infrastructure (NPS EN-5). Available: https://assets.publishing.service.gov.uk/media/65a78a5496a5ec000d731abb/nps-electricity-networks-infrastructure-en5.pdf. Accessed February 2024.

HM Government (2011) UK Marine Policy Statement

Summary of Global Climate Action at COP 28 - United Nations Framework Convention on Climate Change (UNFCCC)

The Infrastructure Planning (Environmental Impact Assessment) Regulations (2017)

The National Grid Company (2009) 'Horlock Rules'

The Planning Inspectorate (2018) Advice Note 18: The Water Framework Directive

The Planning Inspectorate (2018) Advice Note Nine: Rochdale Envelope.

UK Legislation, 'Environment (Wales) Act 2016'

UK Legislation, 'Marine and Coastal Access Act (2009)'

UK Legislation, 'Planning Act (2008)'

UK Legislation, 'Well-being of Future Generations (Wales) Act (2015)'

United Nations Framework Convention on Climate Change (2015) The Paris Agreement

United Nations Framework Convention on Climate Change (2021) Glasgow Climate Pact

Welsh Government (1997) 'Technical Advice Note (TAN) 11: Noise'

Welsh Government (2004) 'Technical Advice Note (TAN) 15: Development and Flood Risk'

Welsh Government (2016) 'Technical Advice Note (TAN) 12: Design'

Welsh Government (2017) Natural Resources Policy

Welsh Government (2019) Welsh National Marine Plan 2015-2021.

Welsh Government (2019a) Prosperity for all: a low carbon Wales. Available: https://www.gov.wales/prosperity-all-low-carbon-wales. Accessed October 2023.

Welsh Government (2021) 'Technical Advice Note (TAN) 14: Coastal Planning'

Welsh Government (2021) Future Wales: The National Plan 2040.Welsh Government (2021) Planning Policy Wales: 11th Edition.

Welsh Government (2021a) Net Zero Wales. Available: https://www.gov.wales/net-zero-wales. Accessed January 2024.

Welsh Government (2022) 'Energy Generation in Wales'