

Natural Resources Wales  
Welsh Government Offices  
Cathays Park

King Edward VII Avenue

Cardiff

CF10 3NQ

**Ebost/Email:** [marine.advice@cyfoethnaturiolcymru.gov.uk](mailto:marine.advice@cyfoethnaturiolcymru.gov.uk)

The Planning Inspectorate  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

By email: [monaoffshorewindproject@planninginspectorate.gov.uk](mailto:monaoffshorewindproject@planninginspectorate.gov.uk)

Dyddiad/Date: 30 September 2024

Er sylw / For the attention of: Jake Stephens

Annwyl / Dear Jake,

**FFERM WYNT ALLTRAETH MONA / PROPOSED MONA OFFSHORE WINDFARM**

**CYFEIRNOD YR AROLYGIAETH GYNLLUNIO / PLANNING INSPECTORATE  
REFERECE: EN010137**

**EIN CYFEIRNOD / OUR REFERENCE: 20048445**

**RE: NATURAL RESOURCES WALES' RESPONSE TO THE EXAMINING  
AUTHORITY'S FIRST WRITTEN QUESTIONS**

Thank you for your Rule 8 letter, dated 23 July 2024, requesting Cyfoeth Naturiol Cymru / Natural Resources Wales' (NRW) comments regarding the above.

Please find below NRW's Response to the Examining Authority's first set of written questions (ExAQ1), published on 13 September 2024.

These comments/question responses should be read in conjunction with advice previously provided into the examination.

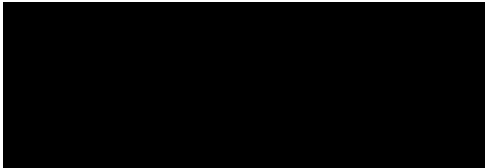
The comments provided in this submission comprise NRW's response as a Statutory Party under the Planning Act 2008 and Infrastructure Planning (Interested Parties) Regulations 2015 and as an 'interested party' under s102(1) of the Planning Act 2008.

Our comments are made without prejudice to any further comments or advice we may wish to make in relation to this application and examination whether in relation to the Environmental Statement (ES) and associated documents, provisions of the draft Development Consent Order ('DCO') and its Requirements, or other evidence and documents provided by RWE ('the Applicant'), the Examining Body or other interested parties.

Should further clarity be required, we will be pleased to answer these further through the Examining Authority questions and / or a Rule 17 request(s).

Please do not hesitate to contact Emma Lowe  
[REDACTED] [\[REDACTED\]@cyfoethnaturiolcymru.gov.uk](mailto:[REDACTED]@cyfoethnaturiolcymru.gov.uk), Nia Phillips  
[REDACTED] [\[REDACTED\]@cyfoethnaturiolcymru.gov.uk](mailto:[REDACTED]@cyfoethnaturiolcymru.gov.uk), and Siôn Williams (Sion.M.  
[REDACTED] [\[REDACTED\]@cyfoethnaturiolcymru.gov.uk](mailto:[REDACTED]@cyfoethnaturiolcymru.gov.uk)) should you require further advice or  
information regarding these representations.

Yn gywir / Yours sincerely,



**Andrea Winterton**  
**Marine Services Manager**  
**Natural Resources Wales**

[CONTINUED]

Question to:	Question:	NRW RESPONSE
<b>General and Cross Topic Questions</b>		
The Applicant NRW (A)	<p><b>NRW SoCG (Offshore)</b></p> <p>Table 1.4 of [REP1-022] indicates that the SoCG being progressed with NRW (A) in relation to offshore matters covers 11 topics. However, REP1-025 only covers 7 of these topics.</p> <ul style="list-style-type: none"> <li>• Can the Applicant and NRW confirm whether or not the topics of commercial fisheries, shipping and navigation, marine archaeology and other sea users are to be included in any NRW SoCG?</li> </ul>	<p>Q1.0.3</p> <p>With the exception of Seascape, landscape and visual impact assessment (which has its own SoCG), the matters listed are not matters within NRW's remit, therefore they will not be progressed within the NRW SoCGs or any other SoCG.</p>
The Applicant DCC, CCBC, NRW(A)	<p><b>Other Consents or Licenses Required [APP-085]</b></p> <p>Can respective parties give a progress update on the licences and consents and advise if there are any that raise concerns that may lead to refusal.</p>	<p>Q1.0.6</p> <p><u>Update on the Transmission Asset Marine Licence Application:</u></p> <p>The Applicant submitted a Marine Licence application in respect of the Transmission Assets to NRW MLT on the 29 April 2024. The application was validated on the 31 May 2024. NRW MLT consulted with various technical organisations and the public. The consultation ran for 28 days and closed on the 19 August 2024. Following consideration of the consultation responses further information was requested from the Applicant on the 9 September 2024. It is expected that the further information will be provided by the Applicant by the 4 November 2024. The NRW MLT further information request letter has been provided for information.</p> <p>As detailed within Written Representation (REP1-056, section 4.1) NRW MLT, has determined that an Environmental Impact Assessment</p>

Question to:	Question:	NRW RESPONSE
		<p>(EIA) is not required in relation to the Marine Licence for the Transmission Assets in reliance on Regulation 10 of the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended). This is on the basis that we are satisfied that an EIA assessment in respect of the project is to be carried out by the Secretary of State and that such assessment will be sufficient to meet the requirements of the EIA Directive. NRW MLT must take into account <i>inter alia</i> the conclusions of the Secretary of State's assessment, any conditions attached to the DCO, and mitigation and monitoring measures. It should be noted that a practical consequence of this is that we would not be in a position to conclude the determination of the Marine Licence application for the Transmission Assets until the DCO has been issued.</p> <p><u>European Protected Species (EPS) licence (marine):</u> The Applicant has not yet submitted a licence for EPS purposes. We understand that the Applicant will apply for an EPS licence post-consent.</p> <p><u>EPS licence (terrestrial):</u>The Applicant has not yet submitted a licence for EPS purposes. We understand that the Applicant will apply for an EPS licence post-consent.</p>
<b>Commercial Fisheries, Fish and Shellfish</b>		
The Applicant NRW(A)	<b>ES Chapter 3 (Vol 2) Fish and Shellfish Ecology [APP-055]</b> There does not appear to be any information on wind turbine sound emissions nor vessels sound	Q1.5.3

<b>Question to:</b>	<b>Question:</b>	<b>NRW RESPONSE</b>
JNCC NWWT	<p>emissions during operation in section 3.9.3. Table 3.6 states that it has been scoped out based on site specific sound information, including modelling of sound emissions from the proposed wind turbines and vessels and effects on fish and shellfish receptors as detailed in section 3.9.3.</p> <p>The Planning Inspectorate did not agree that operational noise of the OWF can be scoped out of the Environmental Statement.</p> <p>Can the Applicant provide the information stated in Table 3.6 on wind turbine sound emissions and vessels; and</p> <p>Can respective parties advise if they have any concerns regarding potential underwater sound during the operational phase impacting fish and shellfish receptors.</p>	<p>The Applicant has provided modelled information on operational noise from turbines and vessels on fish within their underwater noise technical report (Volume 5, annex 3.1).</p> <p>Given the recoverable injury and temporary threshold shift (TTS) thresholds for these are either not exceeded, or remain at a relatively small distance (40m or less for vessels, 5m for turbines), with additional caveats due to modelling vs. actual noise effects which further reduces the impact, NRW (A) are not concerned about these potential impacts on fish receptors.</p>
<b>Draft Development Consent Order (dDCO)</b>		
The Applicant	<p><b>Deemed Marine Licence</b></p> <p>Tables 1.84 and 1.152 of [APP-032] state that a Marine Mammal Mitigation Protocol and an Underwater Sound Management Strategy are proposed to secure measures for injurious effects and disturbance from piling, unexploded ordnance (UXO) clearance and some geophysical activities. These are to be secured in the dDCO [REP2-004] through Part 2 Condition 18(1)(hi) and Part 2</p>	<p>Q1.7.5</p> <p>Although this question has not been directed at NRW MLT, we would however advise the ExA to note the following:</p> <p>Marine and Coastal Access Act 2009 Part 4 section 66 sets out marine licensable activities. These include deposit or removal of material or substance using and vehicle or vessel, or construction, alteration and improvement works. Geophysical activities do not normally fall within the definition of marine licensable activities and therefore would appear</p>

Question to:	Question:	NRW RESPONSE
	Condition 20, respectively; however, neither Condition refers to geophysical activities. Can the Applicant amend the conditions accordingly?	to be more appropriately controlled under other/ separate regulatory regimes.
<b>Habitats Regulations Assessment</b>		
The Applicant NRW (A) JNCC	<p><b>Screening</b></p> <p>Can the Applicant provide further reasoning to its statement that '<i>the likelihood of the Mona Array Area resulting in barrier effects for qualifying features of SPAs are low</i>' (paragraph 1.4.6.25 of [REP2-012].</p> <p>Does NRW (A) and JNCC agree with the Applicant's statement and that barrier effects can be screened out?</p>	<p>Q1.10.2</p> <p>At present we note that there is no widely applicable method of directly assessing barrier effects.</p> <p>Barrier effects limit the migration, or free movement of individuals or populations, thus requiring them to divert from their intended path in order to reach their original destination. The impacts to birds from barrier effects are most likely through increased energetic costs flights, usually between breeding colonies and foraging areas, and/or increased time elapsed between provisioning of young. Individuals are less constrained during the non-breeding season, and therefore increases to overall flight costs due to barrier effects while on migration are likely to be very small (Topping &amp; Petersen 2011).</p> <p>Birds on the water and in flight are both included within the displacement assessment presented by the Applicant, as per SNCB advice (SNCBs 2022). Birds experiencing barrier effects are typically in flight, but not necessarily always so, therefore including birds in flight within a displacement assessment is the closest method available.</p> <p>For the Welsh seabird colony SPAs that may be impacted by the Mona proposal (Skomer, Skokholm and the seas off Pembrokeshire / Sgomer, Sgogwm a Moroedd Penfro SPA; Grassholm SPA and</p>

Question to:	Question:	NRW RESPONSE
		<p>Aberdaron Coast and Bardsey Island / Glannau Aberdaron ac Ynys Enlli SPA), for which NRW has responsibility, we do not consider that barrier effects are a significant consideration. This is because the proposed project is not located in a direct path between it and the key foraging areas contained within the marine portion of these SPAs or within other marine SPA foraging areas such as the Irish Sea Front SPA for Manx shearwater. Additionally, we do not consider that the proposal is likely to result in significantly increased energetic costs to individuals travelling from the SPA to foraging areas beyond the proposal. We also note that tracking data (e.g. from Votier et al. 2010) and utilisation distributions (e.g. Wakefield et al. 2013) suggest that gannets have been shown to display spatial segregation between colonies and that it is unlikely that gannets from Grassholm SPA will forage in the Mona area and hence barrier effects to individuals travelling from the SPA to foraging areas will be negligible for this colony.</p> <p>Foraging by both breeding and non-breeding qualifying features of the Liverpool Bay/Bae Lerpwl SPA occur within the SPA and therefore barrier effects due to the operational project array will not occur.</p> <p>With regard to barrier effects for migratory waterbirds travelling to and from non-breeding SPAs on the coast to breeding grounds, we do not consider that the proposal is likely to result in significantly increased energetic costs to individuals travelling additional distance twice a year to navigate around the project.</p>

Question to:	Question:	NRW RESPONSE
		<p>Therefore, based on the above NRW (A) agrees with the Applicant's statement that barrier effects can be screened out of the assessment with respect to Welsh SPAs. We defer advice on other sites (e.g. Scottish, Irish, English etc) to the respective SNCBs.</p>
<p>The Applicant NRW (A) JNCC</p>	<p><b>Screening</b></p> <p>The ExA notes the Applicant's commitment to assessing in-combination effects where no LSE from the project alone has been concluded in section 1.4 of the HRA Stage 1 Screening Report [REP2-012]. Can the Applicant provide such an assessment, where this has not been done within the HRA and identify the projects or plans considered.</p> <p>Does NRW (A) and JNCC consider that there is the potential for an in-combination LSE for any site/feature where the Applicant has excluded a LSE from the project alone?</p>	<p>Q1.10.3</p> <p><u>Benthic</u>: NRW (A) does not consider that there is the potential for an in-combination LSE for any site/feature where the Applicant has excluded a LSE from the project alone.</p> <p><u>Fish</u>: As above - NRW (A) does not consider that there is the potential for an in-combination LSE for any site/feature where the Applicant has excluded a LSE from the project alone.</p> <p><u>Marine Mammals</u>: In view of the wide-ranging populations, and in the absence of known and fixed SAC populations for harbour porpoise and grey seal, the decision whether to conclude that a given impact pathway should be listed as an LSE should be taken at the management unit (MU) / population level. While generally we would agree that there is no potential for an in-combination LSE where the Applicant has excluded an LSE from the project alone; a conclusion of no LSE for the project alone does not rule out that in-combination the pathway may exceed the threshold for an LSE.</p> <p>We consider that there may be a potential for an in-combination contribution to LSE for vessel collision at the MU level.</p>



Question to:	Question:	NRW RESPONSE
		<p>The Applicant should consider this in line with NRW's position statement on mortality limits, and in line with our position statement on the use of Management Units in HRA which recommends carrying out an iterative assessment process.</p> <p><u>Marine Ornithology:</u></p> <p>With regard to marine ornithology, at present we consider that there is the potential for an in-combination LSE for Welsh site/feature combinations, however until revised assessments using the SNCB advised approach to displacement (i.e. to consider impacts across the full range of advised % displacement and % mortality rates) are submitted by the Applicant, we are unable to provide advice. We understand that this information is intended to be submitted by the Applicant at Deadline 3. Therefore, we will advise further following full review of the document once it is submitted into the examination.</p> <p><u>Terrestrial Ecology:</u></p> <p>There are no terrestrial sites / features of concern, so this question does not apply in this context.</p>
The Applicant NRW(A)	<p><b>Conservation objectives</b></p> <p>The Stage 2 SAC Report [APP-032] notes that condition assessments are not available for a number of SACs. Can the Applicant and NRW (A) confirm whether condition assessments have since become available/ are likely to become</p>	<p>Q1.10.5</p> <p>The harbour porpoise sites are not part of the current assessments as they are cross border sites. Condition Assessments for these sites are not available nor likely to be available during the course of examination.</p>

Question to:	Question:	NRW RESPONSE
	<p>available during the course of the examination for any of the following:</p> <ul style="list-style-type: none"> <li>• River Derwent and Bassenthwaite Lake SAC</li> <li>• Solway Firth SAC</li> <li>• North Anglesey Marine/Gogledd Môn Forol SAC</li> <li>• North Channel SAC</li> <li>• Murlough SAC</li> <li>• The Maidens SAC</li> <li>• Bristol Channel Approaches/Dynesfeydd Môr Hafren SAC</li> <li>• Lundy SAC</li> <li>• Isles of Scilly Complex SAC</li> </ul>	
The Applicant NRW(A)	<p><b>Conservation Objectives</b></p> <p>The Stage 2 SAC Report [APP-032] identifies sites and features in unfavourable condition. However, the condition of SPA's/Ramsar's has not been stated within the Stage 2 SPA Report [REP2-010]. Can the Applicant and NRW(A) advise if this information is available?</p>	<p>Q1.10.7</p> <p>Information on Welsh SPAs, including information on current conservation status of site features, can be found by searching for the relevant site name on: <a href="https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/find-protected-areas-of-land-and-sea/?lang=en">https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/find-protected-areas-of-land-and-sea/?lang=en</a></p> <p>The Site Management Plans include information on the conservation objectives, performance indicators (e.g. population size attribute) for each feature and conservation status and management requirements for each feature. However, we note that these Site Management Plans are considered out of date and note that the Seabird Count (most</p>

Question to:	Question:	NRW RESPONSE
		<p>recent census, 2015-2021) has been completed since and the results are now available. Based on using the best available evidence of the results from the Seabirds Count and the most up to date colony data for the Grassholm gannet colony post the outbreak of Highly Pathogenic Avian Influenza (HPAI), the features of the Welsh SPAs considered in the Mona HRA Stage 2 ISAA SPA report to be in unfavourable condition are:</p> <ul style="list-style-type: none"> <li>• Skomer, Skokholm and seas off Pembrokeshire SPA: lesser black-backed gull.</li> <li>• Grassholm SPA: gannet, due to the effects of the mass mortality of from HPAI.</li> </ul> <p>Information on conservation objectives and favourable condition regarding features of the Liverpool Bay SPA can be found in the site's recent (December 2022) Conservation Advice Package, which can be accessed from: <a href="https://publications.naturalengland.org.uk/file/4591112403812352">https://publications.naturalengland.org.uk/file/4591112403812352</a>. The red-throated diver feature of this SPA has a restore conservation objective for population distribution and extent and distribution of supporting habitat. In addition, there is a minimise target for disturbance caused by human activity conservation objective for all qualifying features of the site.</p> <p>We note that all Welsh only SPAs will be getting new condition assessments with updated condition by the end of this year (2024), however, this will not be published until March 2025. The current aim is to run assessment in October 2024 at which point NRW (A) may be able to advise the ExA further.</p>

Question to:	Question:	NRW RESPONSE
		<p>No new condition assessments will be made for cross-border SPAs (e.g. those shared with Natural England and/or have elements beyond 12nm and hence are shared with JNCC), such as Liverpool Bay / Bae Lerpwl SPA.</p> <p>Information on sites located outside of Wales should be requested from the respective SNCBs.</p>
The Applicant	<p><b>Conservation Objectives</b></p> <p>Can the Applicant confirm whether any qualifying features of the European sites assessed in the Stage 2 SPA Report [REP2-010] are in unfavourable condition and/or has a restore Conservation Objective (CO) target?</p>	<p>Q1.10.8</p> <p>Although directed at the Applicant, NRW (A) consider it pertinent to respond to this question and note our response to Q1.10.7 above.</p>
The Applicant	<p><b>Stage 2 assessment</b></p> <p>The Applicant's Stage 2 SAC Report [APP-032] and Stage 2 SPA Report [REP2-010] rely upon measures in an Offshore Environmental Management Plan (EMP) to avoid adverse effects on marine mammal and offshore ornithological qualifying features. Can the Applicant provide an outline Offshore EMP to provide assurance that all measures relied upon to avoid AEol are secured?</p>	<p>Q1.10.12</p> <p>Although directed at the Applicant, NRW (A) consider it pertinent to respond to this question.</p> <p>NRW (A) have previously commented (Section 2.1.2.6 of REP1-056) regarding the need for securing the mitigation measures relied upon to avoid adverse impacts, particularly regarding the red-throated diver and common scoter features of Liverpool Bay SPA. In paragraph 149 of REP1-056 we advised that the timing restriction on cable laying activities within the SPA aspect of the measures/conditions within the EMP needs to also be included within the DCO and committed to and secured in the deemed marine licence in order to minimise disturbance to the key features from this activity. If an Offshore EMP is submitted</p>

Question to:	Question:	NRW RESPONSE
		<p>into the examination by the Applicant as is suggested here by the ExA, which includes the same seasonal restriction, then we may be content that the measure is secure. Although we note that a revision of the DCO would be required to reflect that a finalised Offshore EMP would need to be agreed by the Licencing Authorities, in consultation with the SNCBs. This will require consideration by NRW MLT.</p> <p>In addition, we also note the following:</p> <ul style="list-style-type: none"> <li>• Currently there is ambiguity between the updated Marine Licence Principles Document [REP2-028/029] and the Measures To Minimise Disturbance To Marine Mammals And Rafting Birds From Transiting Vessels report [APP-203]. The former refers to 'works', while the latter refers to cable installation activities. We note that the reference to 'works' in the latter potentially allows for other activities set out in the definition of 'commence' in Part 1 of the DCO (pre-construction surveys and monitoring, and unexploded ordnance surveys and clearance of unexploded ordnance) to occur within the sensitive period for the SPA.</li> <li>• There is an apparent discrepancy in the timings required of the NRW Marine Licence and the DCO deemed Marine Licence. Marine Licence Principles Document Table 1 page 20 [REP2-028/029] states that the NRW Marine Licence would require the Applicant to submit a Project Environmental Management Plan (PEMP) to NRW at least <u>6 weeks</u> prior to commencement of the Licenced Activities, but states 'dML condition 18((1)(e) requires submission of an offshore environmental management plan <u>4 months</u> prior to commencement of the authorised scheme'. We note that this could leave a situation where an Offshore EMP is agreed by MMO, but NRW do not agree with a proposed PEMP.</li> </ul>

Question to:	Question:	NRW RESPONSE
		Therefore we suggest that the timescales for submission of these documents are aligned, and ideally achieved in consultation with both Licencing Authorities together.
NRW (A) JNCC	<p><b>Stage 2 in-combination assessment</b></p> <p>Is NRW (A)/JNCC content with the projects included in the in-combination assessments as detailed in:</p> <ul style="list-style-type: none"> <li>• Annex I habitats – Table 1.21 and Figure 1.9 of [REP2-012]</li> <li>• Annex II diadromous fish species – Table 1.58 and Figure 1.9 of [REP2-012]</li> <li>• Annex II marine mammals – Table 1.154 and Figure 1.13 of [REP2-012]</li> <li>• Offshore ornithological features – Table 1.57 and Figure 1.21 of [REP2-010]</li> </ul>	<p>Q1.10.14</p> <p>*note that REP2-012 takes the reader to the wrong document. We have therefore reviewed APP-032 in order to answer the first 3 bullets of this question.</p> <p><u>Benthic Ecology:</u></p> <p>NRW (A) are content with the projects included in the in-combination assessments as detailed in the referenced table and figure.</p> <p><u>Fish:</u></p> <p>NRW (A) note that Mersey tidal power project has not been included in the in-combination assessment, however it is our understanding that a scoping opinion has not yet been submitted for the project. We are content on the inclusion of the other projects within the in-combination assessment.</p> <p><u>Marine Mammals:</u></p> <p>NRW (A) are satisfied with the projects included in the in-combination assessments.</p> <p><u>Marine Ornithology:</u></p>

Question to:	Question:	NRW RESPONSE
		<p>With regard to offshore ornithology, we assume that the ExA are referencing Table 1.63 of REP2-010 (which is the equivalent of Table 1.57 of APP-033, the original submission of this document) '<i>List of other projects and plans with potential for in-combination effects on offshore ornithology</i>' and Figure 1.12 of REP2-010 '<i>Location of other projects and plans considered for in-combination effects on SPAs and Ramsar sites with offshore ornithological features</i>' not Figure 1.21 which does not exist.</p> <p>We are content with the projects included in the in-combination assessments, as detailed in Table 1.63 of REP2-010 (equivalent to Table 1.57 of APP-033) and Figure 1.12 of REP2-010. However, we note our comments set out in Section 2.1.3.1 and 2.1.4.5 of our Relevant Representations [RR-011] and Sections 2.1.1.3.1 and 2.1.2.5 of our Written Representations [REP1-056] regarding the gaps in data for historic projects in the cumulative and in-combination assessments and the Applicant's approach to in-combination assessments. We understand that the Applicant intends to submit documents at Deadline 3 to address these issues. Therefore, we cannot provide further advice on in-combination assessments until we have fully reviewed the documents to be submitted at Deadline 3.</p>
NRW, DCC, CCBC	<p><b>Assessment of Effects at locations around the Onshore Substation</b></p> <p>Do you agree with the assessment of the sensitivity, magnitude of impacts and significance of effects of the representative VP around the</p>	<p>Q1.13.5</p> <p>Our comments on the application relate to its impact on the purposes of nationally designated landscapes in Wales. As these viewpoints are located outside of a designated landscape, we defer to the LPA on this matter.</p>

Question to:	Question:	NRW RESPONSE
	<p>Onshore Substation provided in [APP-069], particularly:</p> <ul style="list-style-type: none"> <li>• The assessment of magnitude of impact and significance of effects on Representative VP 1, 2, and 3, at Y1 and Y15.</li> <li>• The reduction in the significance of adverse effects at these VPs after the implementation of the mitigations outlined in the OLEMP [REP2-084] and shown in the visualisations.</li> <li>• Whether the mitigations shown in the OLEMP, and in the annotated visualisations included in the Response to Hearing Action Points (S_D1_5.3) [REP1-015], would reduce the operation effects from significant to non-significant for VPs 2 and 3.</li> </ul>	
<b>Marine and Coastal Physical Processes and Coastal Change</b>		
NRW (A)	<p><b>Trenchless Techniques</b></p> <p>Paragraph 220 of [REP1-056] states that the commitment to securing trenchless techniques in the intertidal area is not explicit enough in the MLPD [REP2-028].</p> <p>Can you provide a form of wording that would rectify this concern.</p>	<p>Q1.14.2.</p> <p>We consider that subject to NRW (A) being consulted, in writing, on the suitability of the final LCMS where the commitment to trenchless techniques at the intertidal is noted, then we do not require further detail to be provided at this point. We will work with the Applicant to agree the suitability of the relevant plans, as required / appropriate. Should the Applicant wish to provide additional detail now, then we will be content to review accordingly.</p>



Question to:	Question:	NRW RESPONSE
NRW(A)	<p><b>OLCMS</b></p> <p>Do you consider that the OLCMS [REP2-066] should contain an outline landfall monitoring plan for post construction monitoring?</p>	<p>Q1.14.3.</p> <p>From a marine perspective, we are not clear what the ExA is specifically asking here and request that further clarity is provided.</p> <p>From a terrestrial perspective, we are content for the OLCMS to contain and OLMP for post consent monitoring. However, details can also be finalised in the final LEMP. We are content for its inclusion or cross-referencing to the final LEMP.</p>
The Applicant/ NRW(A)	<p><b>Sandwave Recovery Monitoring</b></p> <p>[REP1-056] reiterates NRWs request that sandwave recovery monitoring should be included in post installation surveys, particularly on Constable Bank which would support statements as well as to help inform future work. The ExA notes that the Applicant does not consider this necessary as no significant effects were to be predicted.</p> <p>Applicant:</p> <p>Paragraphs 2.8.83 and 2.8.85 of NPS EN-3 state, that where requested by the SoS, Applicants are required to undertake geomorphological surveys both prior to and during construction and operation which would enable an assessment of the accuracy of the original predictions and improve the evidence base for future mitigation and compensation measures to enable better decision</p>	<p>Q1.14.4.</p> <p>Please see NRW (A)s deadline 3 response, at section 1.4, paragraphs 106-110.</p>

Question to:	Question:	NRW RESPONSE
	<p>making in future EIAs and HRAs. Can the Applicant provide further justification, in light of these paragraphs, as to why it feels this would not be appropriate in this instance despite the request by NRW.</p> <p>NRW: Monitoring would be undertaken to observe the effect of sediment transport and sediment pathways on cable burial as outlined in Table 1.2 of the Offshore in-principle monitoring plan [APP-201]. Would this address your concerns or could amendments be made to this to address your concerns?</p>	
<b>Offshore Biodiversity, Ecology and Natural Environment</b>		
<b>Benthic subtidal and intertidal ecology</b>		
NRW (A) JNCC NWWT	<p><b>Significance of effects</b></p> <p>Table 2.36 in ES Chapter 2 (Vol 1) Benthic subtidal and intertidal ecology [APP-054] presents a summary of the potential impacts, the associated important ecological features, and significance of effects.</p> <p>i) If you disagree with any listed aspect including Applicant's significance of effects,</p>	<p>Q1.17.2</p> <p>(i) We agree with the information presented in the tables referenced.</p> <p>(ii) We do not consider that there are significant EIA effects – please see our Written representations.</p>

Question to:	Question:	NRW RESPONSE
	<p>can you identify and provide evidence to justify your opinion.</p> <p>ii) If you consider any effect to be significant in terms of EIA, can you identify and advise on any possible and realistic mitigation measures to enable residual effects to be not significant in terms of EIA.</p>	
<p>NRW (A) JNCC NWWT</p>	<p><b>Cumulative effects</b></p> <p>Table 2.37 in ES Chapter 2 (Vol 1) Benthic subtidal and intertidal ecology [APP-054] presents a summary of the potential cumulative effects, the associated important ecological features, and significance of effects.</p> <p>i) If you disagree with any listed aspect including Applicant's significance of effects, can you identify and provide evidence to justify your opinion.</p> <p>ii) If you consider any effect to be significant in terms of EIA, can you identify and advise on any possible and realistic mitigation measures to enable residual effects to be not significant in terms of EIA</p>	<p>Q1.17.3</p> <p>(i) We agree with the information presented in the tables referenced.</p> <p>(ii) We do not consider that there are significant EIA effects – please see our Written representations.</p>
<b>Marine Mammals</b>		
The Applicant	If scenario 1 involved excluding UXO clearance from the DCO and Deemed Marine Licence, and scenario 2 involved UXO clearance restricted to	<p>Q1.17.9</p> <p>Scenario 2 would be preferable over Scenario 1 although both would be acceptable. This is because Scenario 2 aligns better with the 2022</p>

<b>Question to:</b>	<b>Question:</b>	<b>NRW RESPONSE</b>
JNCC NRW(A)	only low-order clearance charges; can parties advise if it would be supportive or not to either approach with reasoning.	SNCB position statement on UXO clearance where SNCBs explicitly stated that low order clearance should be the default method. Inclusion of low-order clearance of UXO in the DCO and DML is both in agreement with the position statement and demonstrates more commitment to the low order approach since no additional ML applications would be needed except in the case of a high order clearance. This position is also applicable to the transmission assets Marine Licence.
<b>Ornithology</b>		
JNCC, NRW(A)	Are you satisfied that the site specific digital aerial survey (DAS) reflects Manx shearwater baseline characterisation. If not, can you provide evidence to justify your position?	Q1.17.3 We note that NRW have not raised any concerns with the DAS data reflecting Manx shearwater baseline characterisation. However, we note that there are known limitations of DAS in relation to crepuscular and nocturnal species such as Manx shearwater. This is because DAS, out of necessity, need to be conducted during daylight hours. Therefore, it is likely that some activity of this species will have been missed. However, we consider that the significance of this is most likely to be greatest at locations in close proximity to colonies, where Manx shearwater will often gather in larger numbers at dusk to avoid predation as adults return to the colony at night. Given the distance of the proposed Mona project array from Manx shearwater colonies, we do not consider such gatherings are likely in the array area or in close proximity to it. Therefore, we are satisfied that the distribution identified in the site-specific DAS surveys is likely to be representative of the use of the area.
JNCC, NRW(A)	Are you are satisfied with the collision risk assessment for Manx Shearwater and its	Q1.17.4 We note that NRW have not raised any concerns regarding the Manx shearwater collision risk assessment. However, we note the concerns

Question to:	Question:	NRW RESPONSE
	conclusion. If not, can you provide evidence to justify your position?	raised by the RSPB regarding the collision risk modelling does not adequately consider attraction to lighting by Manx shearwater, as noted in their Relevant Representations [RR-071] and Statement of Common Ground [REP2-088]. Manx shearwaters are known to be attracted to light and can also be disoriented, for example due to the lighting at the top of a wind turbine. However, we note that this additional collision risk cannot be modelled in the current methods to assess collision risk and we are not aware there is currently any evidence available to quantify that risk. Therefore, given the limitations of the existing evidence base, we are satisfied that the collision risk model is as robust as it currently can be.
<b>Onshore Biodiversity, Ecology and Natural Environment</b>		
DCC, CCBC, NRW (A) RSPB Cymru NWWT	<b>OLEMP [REP2-034]</b> Are you satisfied with the Applicant's onshore/landfall approach to: i) habitats - mitigation, management, and monitoring; and ii) protected species – mitigation, management, and monitoring. If not, can you provide reasons with supporting evidence to justify your position.	Q1.18.8 Please refer to Ecology (Terrestrial) Response to Applicant Deadline 3 submission, section 2.4.
<b>Seascape and Visual Resources</b>		
NRW (A)	<b>Seascape, Landscape Visual Impact Assessment (SLVIA)</b> In [RR-011], paragraph 3.1.2.5, you outline that there are methodological and presentational	Q1.20.1 Please refer to Paragraph 267 in our written representations [REP1-056] for further information on this matter.

Question to:	Question:	NRW RESPONSE
	<p>issues with the visualisations and figures within the SLVIA.</p> <ul style="list-style-type: none"> <li>• Could you describe these issues in more detail?</li> <li>• Provide specific examples of where visualisations and/or photography are unsuitable or not presented in accordance with best practice guidance.</li> <li>• Comment on the Applicant's response provided in paragraph 1.2.4, [PDA-012].</li> </ul>	<p>Additionally, we advise best practice guidance on visualisation techniques for offshore wind turbines is provided in the NatureScot guidance on the Visual Representation of Wind Farms, Version 2.2, February 2017. This guidance recognises there can be difficulties in photographing wind farms due to the lack of contrast between light-coloured turbines and a light-coloured sky and emphasises that '<b><i>It is therefore essential that all baseline photographs are taken in good visibility</i></b>'<sup>1</sup>. Regarding offshore wind turbines specifically, the guidance advises that:</p> <ul style="list-style-type: none"> <li>• '<i>Practitioners should aim to prepare visualisations representing the specific time of day and season when <b>there is optimum visibility and clarity</b></i>'.<sup>2</sup> (our emphasis).</li> <li>• '<i>A key factor is achieving <b>sufficient contrast between the sky and the sea so that the horizon is clear</b></i>'.<sup>3</sup> (our emphasis).</li> </ul> <p>At the following viewpoints (VP) within the Isle of Anglesey National Landscape (IoA NL), there is not sufficient contrast between the sky and the sea, and therefore the horizon is not sufficiently clear:</p> <ul style="list-style-type: none"> <li>• VP 1: Mynydd y Garn trig point (Figures 1.1 - 1.2) [APP-106].</li> <li>• VP 4: Bwrdd Arthur trig point (Figures 4.1 - 4.2) [APP-106].</li> </ul>

<sup>1</sup> Scottish Natural Heritage Visual Representation of Wind Farms Guidance Version 2.2 Paragraph 110

<sup>2</sup> Scottish Natural Heritage Visual Representation of Wind Farms Guidance Version 2.2 Paragraph 206

<sup>3</sup> Scottish Natural Heritage Visual Representation of Wind Farms Guidance Version 2.2 Paragraph 215 Third Bullet

Question to:	Question:	NRW RESPONSE
		<ul style="list-style-type: none"> <li>• VP 26: Yr Arwydd trig point, near Mynydd Bodafon (Figures 22.1 - 22.2) [APP-108].</li> <li>• VP 55: Trwyn Eilian (Point Lynas) (Figures 44.1 - 44.2) [APP-111].</li> </ul> <p>Although a greater contrast between the sea and sky was achieved in the photographs at the other IoA NL viewpoints (below), low cloud and/or mist was present which means these visualisations also do not represent optimum visibility and clarity:</p> <ul style="list-style-type: none"> <li>• VP 2: Llanlleiana Head (Figures 2.1 - 2.2) [APP-106].</li> <li>• VP 3: Mynydd Eilian (Figures 3.1 - 3.2) [APP-106].</li> <li>• VP 24: Bull Bay, Amlwch (Figures 20.1 - 20.2) [APP-108].</li> <li>• VP 25: Moelfre Headland (Figures 21.1 - 21.2) [APP-108].</li> <li>• VP 28: Penmon Point (Figures 24.1 - 24.2) [APP-108].</li> <li>• VP 57: Trwyn Cemlyn (Figures 46.1 - 46.2) [APP-111].</li> </ul> <p>It is also advised that when using the visualisations on site, the landscape appears smaller in the photomontages than in reality. This means that when viewing the photomontages on site or at 100% on screen, the turbines will also appear smaller than they would in reality. This issue can be seen when comparing the Applicant's photomontages with those prepared from the same viewpoints for the Awel y Môr application. For example, compare VP 3 Mynydd Eilian in both applications<sup>4</sup>. The turbines from both schemes are located at a similar distance from this viewpoint, but the turbines within the Awel y Môr Array appear significantly larger, despite being smaller turbines.</p>

<sup>4</sup> The relevant document reference for the AyM Examination is **APP-232**.

Question to:	Question:	NRW RESPONSE
		<p>Regarding the supporting wireline visualisations, we advise these do not accord with recommended best practice as they do not show all turbines with one blade positioned straight upwards<sup>5</sup> i.e. at maximum height.</p> <p>We advise the visualisations will inevitably form a key piece of evidence in the determination of the seascape and visual effects of the proposed development. It is therefore crucial they are of a high quality and that they can be relied upon, particularly because there are limitations to all visualisations, even those prepared in optimum conditions. For example, as explained in the NatureScot guidance, <i>‘a visualisation can never show exactly what the wind farm will look like in reality due to factors such as: different lighting, weather and seasonal conditions which vary through time and the resolution of the image’</i>.<sup>6</sup> Key limitations in replicating the visual experience include:</p> <ul style="list-style-type: none"> <li>• <i>‘It is generally impossible to reproduce the full contrast range visible to the human eye’</i><sup>7</sup> and that <i>‘neither the screen nor the printed image can capture the contrast or depth you see in real life’</i><sup>8</sup>; and</li> <li>• <i>‘A static image cannot convey turbine movement, or flicker or reflection from the sun on the turbine blades as they move’</i>.<sup>9</sup></li> </ul>

<sup>5</sup> Scottish Natural Heritage Visual Representation of Wind Farms Guidance Version 2.2 Paragraph 125

<sup>6</sup> Scottish Natural Heritage Visual Representation of Wind Farms Guidance Version 2.2 Page 46

<sup>7</sup> Scottish Natural Heritage Visual Representation of Wind Farms Guidance Version 2.2 Paragraph 99

<sup>8</sup> Scottish Natural Heritage Visual Representation of Wind Farms Guidance Version 2.2 Paragraph 100

<sup>9</sup> Scottish Natural Heritage Visual Representation of Wind Farms Guidance Version 2.2 Page 46



Question to:	Question:	NRW RESPONSE
		<p>We note the Applicant's response provided in paragraph 1.2.4 [PDA-012], but advise other applications e.g. Awel y Môr were able to capture more suitable baseline photography at viewpoints from within the IoA NL. For example, compare the Applicant's photograph/ photomontage from VP 55: Trwyn Eilian (Point Lynas) (Figure 44.2) [APP-111] with the photomontage taken from the same location (Ref VP 2) and submitted as part of the Awel y Môr application<sup>10</sup>. Both Arrays are located at a similar distance from this viewpoint.</p>
NRW (A)	<p><b>Magnitude of change</b></p> <p>In [REP-1-056] paragraphs 360 and 361, you describe the implication of the ratio between the heights of the turbines and the distance from them for a 364m blade-tip height – as outlined in NRW Evidence <i>NRW Report No 315</i>. This determines the likelihood of the magnitude of change and overall effects.</p> <ul style="list-style-type: none"> <li>• Is the determination of the likelihood of effects and their level based upon only the ratios described, or is an element of judgement required?</li> <li>• Would the magnitude of change and overall effect as informed by the ratios described</li> </ul>	<p>Q1.20.2</p> <p>The determination of effects is not based only on the ratios described. The determination of effects requires judgements based on the specific details of the application, the character and specific sensitivities of its context, and the best available evidence relating to these matters, which, in this case includes the NRW Evidence Reports. The research undertaken in preparing the NRW Evidence Report indicates that, when reaching judgements on visual effects of offshore wind turbines, there is a relationship between the height of offshore wind turbines and the distance offshore. Notwithstanding this, the Report recognises the significance of the effects of offshore wind turbines is a judgement that will vary depending on a number of factors<sup>11</sup>. It advises that based on the review undertaken of previous examinations and inquiries relating</p>

<sup>10</sup> The relevant document reference for the AyM Examination is **APP-231** (Figure: 29g).

<sup>11</sup> Seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance Stage 1- Ready reckoner of visual effects related to turbine

Size Simon White, Simon Michaels and Helen King, White Consultants NRW Report No 315, Section 4.2.

Question to:	Question:	NRW RESPONSE
	also depend on other features, obstacles, or landscape characteristics?	<p>to offshore windfarms inter-visible with either National Parks or AONBs (National Landscapes) that<sup>12</sup>:</p> <ul style="list-style-type: none"> <li>• <i>‘Factors which have been considered by Inspectors or Examining Authorities to reduce harm include a very limited number of views from designated areas, whether a designated area relates mainly to the land, and where there are significant developments such as power stations or urban areas located on the coast or offshore, such as existing offshore windfarms’.</i></li> <li>• <i>‘Factors which have been considered to increase harm include where the designated areas affected have special qualities relating to the coast and sea, where wind farms are proposed directly off the coast of these designated areas, where multiple designated areas are affected and where other factors such as visual overlapping of turbines (even with smaller sizes) are apparent’.</i></li> </ul> <p>In relation to the Factors reducing harm, we advise:</p> <ul style="list-style-type: none"> <li>• The impacts of the Mona Array would not be limited to a ‘very limited number of views from designated areas’. In relation to the IoA NL, the Applicant’s Zone of Theoretical Visibility (ZTV) analysis illustrates the turbines would be visible along the entire northern coastline of the Island (SLVIA Figure A.4), notwithstanding any screening provided by localised variations in topography and vegetation/buildings etc. Consequently, 11</li> </ul>

<sup>12</sup> Seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance Stage 1- Ready reckoner of visual effects related to turbine

Size Simon White, Simon Michaels and Helen King, White Consultants NRW Report No 315, Section 2.4.

Question to:	Question:	NRW RESPONSE
		<p>different viewpoints distributed across the full extent of the north coast of the IoA NL are included within the SLVIA.</p> <ul style="list-style-type: none"> <li>• The IoA NL designated area does not relate mainly to the land; it relates fundamentally to the coast and views of the open sea are integral to its character and special qualities, including ‘expansive views / seascapes’ and ‘peace and tranquillity’<sup>13</sup>.</li> <li>• At the majority of locations from which the Mona Array would be visible, on the IoA NL, there are no significant developments such as power stations or urban areas located on the coast or offshore.</li> <li>• At some of the viewpoints within the IoA NL, existing offshore windfarms are visible. For example, wind turbines within the Gwynt y Môr Array are visible from Penmon Point, at a distance of approximately 29km. The consented Awel y Môr development would also be visible along the northern coast of the IoA.</li> </ul> <p>In relation to the factors which have been considered to increase harm:</p> <ul style="list-style-type: none"> <li>• The IoA NL has special qualities relating to the coast and sea, and the proposals would impact on those qualities.</li> <li>• It is not clear what is meant by ‘wind farms are proposed directly off the coast of these designated areas’. It is not clear whether this relates to distance or the angle of view.</li> <li>• Views from multiple designated areas in Wales would be affected by the proposed offshore development, namely the IoA NL and Eryri National Park.</li> </ul>

<sup>13</sup> Isle of Anglesey Area of Outstanding Natural Beauty Management Plan 2023-2028 Page 7.

Question to:	Question:	NRW RESPONSE
		Some visual overlapping of turbines within the Mona Array may occur in conditions of very good to excellent visibility, at locations such as Penmon Point, but this is not unusual for a wind farm of this size.
NRW (A) The Applicant	<p><b>Visual effects</b></p> <p>In [REP1-056] Annexe B, paragraph 367, referring to guidance from NRW's evidence base, it states that "The array is not located 'beyond the limit of negligible visual effects, particularly for the highest sensitivity area National Parks/AONB's overlaid with heritage coasts".</p> <ul style="list-style-type: none"> <li>• What does NRW consider to be the limit of negligible visual effects for the IoANL ,ENP and the CRDV National Landscape?</li> <li>• What is The Applicant's view on this?</li> </ul>	<p>Q1.20.3</p> <p>Although the Stage 2 Guidance on Siting Offshore Windfarms<sup>14</sup> refers to a limit of negligible effects, this is not defined in the Guidance – it must be tested on a case by case basis.</p> <p>Our comments are based on the fact the Array is not located beyond the limit of a 'low magnitude of effects' which is defined (albeit approximately) in the Guidance. The buffer distances for a low magnitude of effect for turbines between 300-350m tall (the tallest considered in the study) is 44km<sup>15</sup>. The Guidance explains that '<i>Low magnitude buffer distances are an indication that there is a likelihood that there are no significant effects on a high sensitivity receptor for the size of wind turbine at, or beyond, the distance stated.</i>'<sup>16</sup> i.e. beyond 44km. It is therefore reasonable to assume the limit of negligible effects would typically be expected to be beyond this distance.</p> <p>The Mona Array is located closer to the IoA NL (and Heritage Coast) than 44km, and at its closest is 29km. It is within 37km of viewpoints in the ENP. It therefore does not adhere to the recommended principle in the Guidance to '<i>Locate developments beyond the limit of negligible</i></p>

<sup>14</sup> Seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance Stage 2- Guidance on siting offshore windfarms Simon White, Simon Michaels and Helen King, White Consultants NRW Report No 330, Page 11

<sup>15</sup> Noting this suggested distance was updated to 40km for turbines between 351-400m in height in the Review and Update of Seascape and Visual Buffer study for Offshore Wind farms, White Consultants, 2020, Table 13.4, Page 116.

<sup>16</sup> Seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance Stage 1- Ready reckoner of visual effects related to turbine size Simon White, Simon Michaels and Helen King, White Consultants NRW Report No 315, Page 15

Question to:	Question:	NRW RESPONSE
		<i>visual effects, particularly for the highest sensitivity National Parks/AONBs overlaid with Heritage Coasts</i> . <sup>17</sup>
NRW (A)	<b>Additional information</b> To what extent does the Applicant's response in [PDA-012] address your points raised in [RR-011], paragraph 3.1.2.6, concerning additional information requested in the PEIR response?	Q1.20.4 The Applicant's provision of further analysis regarding potential cumulative visibility of the Mona and Awel y Môr Arrays from the Wales Coast Path satisfies our previous request.
NRW (A)	<b>Response to RRs</b> To what extent does the Applicant's response in [PDA-012] address your points raised in [RR-011], paragraph 3.1.2.7, concerning cumulative wireline visualisations, relevant viewpoints, and the inclusion of the Mona Onshore Substation Awel Y Mor substation and other Tier 1 Developments?	Q1.20.5 The Applicant has not provided the information we requested, and we continue to advise this information should be provided. However, we note the Applicant's Response in [PDA-012] is now superseded by [REP2-080], in which the Applicant states they intend to submit: <ul style="list-style-type: none"> <li>• Additional cumulative wirelines at Deadline 3 which show the Mona Array in combination with the Awel y Mor Array at additional viewpoints, and</li> </ul> 'Cumulative visuals' of the Mona and Awel y Môr onshore substations and the National Grid Extension where sufficient information is available.
NRW (A)	<b>SLVIA viewpoints</b> In [REP-1-056] paragraph 374, you state that "Existing offshore wind farms are either not visible from or have a negligible impact on the majority of SLVIA viewpoints". Would this still be true after the	Q1.20.6 We advise this would change because the Awel y Môr Array would be visible at the majority of the SLVIA Viewpoints on the IoA NL and within the Eryri National Park (ENP) and, at the majority of viewpoints would result in effects which are greater than negligible. At certain viewpoints,

<sup>17</sup> Seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance Stage 2- Guidance on siting offshore windfarms Simon White, Simon Michaels and Helen King, White Consultants NRW Report No 330, Table 4.1

Question to:	Question:	NRW RESPONSE
	construction of the Awel Y Mor Offshore Wind Farm?	turbines within the Awel y Môr Array (which are smaller than those proposed in the Mona Array) would be closer to the viewer than those in the Mona Array e.g. VP 4. The extent to which the Awel y Môr Array would be visible or would interact with the Mona Array at SLVIA viewpoints within the IoA NL and ENP is restricted by the omission of cumulative wirelines from the majority of viewpoints within the IoA NL and ENP (cumulative wirelines are only provided for VPs 3 and 28 within the IoA NL, and VP 6 within the ENP).
NRW (A)	<p>Enhancement and offsetting measures</p> <p>In [REP1-056] paragraph 386, you state that you consider that the <i>“Mona array would cause significant adverse effects on the IoA NL and the ENP”, and that “If the Applicant cannot mitigate these effects, they should provide offsetting/enhancement measures”</i>. It is also suggested that a proportionate enhancement scheme for the IoA NL and ENP should be provided to compensate for adverse effects consent were to be granted. Are there any specific enhancement or offsetting measures or projects that you would propose?</p>	<p>Q1.20.10</p> <p>We consider offsetting/enhancement measures should support the purpose of conserving and enhancing the natural beauty of the affected designated landscapes, and contribute to the conservation and enhancement of the Special Qualities, as set out in the applicable Management Plan. The Management Plans identify the actions required to ensure these qualities are conserved and enhanced for future generations. These actions could be used to identify the most appropriate offsetting/enhancement measures or projects. For example, ‘Enhancing Countryside and Coastal Character’ is a key theme within the Isle of Anglesey Area of Outstanding Natural Beauty Management Plan 2023-2028 and this specifies, for example, an action to maintain and enhance traditional landscape features such as woodlands, hedgerows and dry stone walls within the AONB<sup>18</sup>.</p>
The Applicant	<p><b>Landscape enhancement scheme</b></p> <p>R24 of the AyM Offshore Wind Farm DCO secures a landscape enhancement scheme which would</p>	<p>Q1.20.11</p> <p>If adverse effects on the IoA NL and ENP are not mitigated, the Applicant should provide offsetting/enhancement measures.</p>

<sup>18</sup> Isle of Anglesey Area of Outstanding Natural Beauty Management Plan 2023-2028 Page 24.

Question to:	Question:	NRW RESPONSE
NRW (A)	<p>include measures to compensate for the impact on the IoANL, ENP and Great Orme Heritage Coast.</p> <ul style="list-style-type: none"> <li>• Would a requirement akin to R24 be appropriate for the Mona Offshore Wind Farm DCO?</li> <li>• If not, why not?</li> </ul>	<p>Opportunities to enhance designated landscapes are encouraged by the Welsh National Marine Plan 2019 but no proposals for enhancement are included. Enhancements represent compensation and/or offsetting and not mitigation for adverse effects, as any enhancements would not be directly related to the impacts. Notwithstanding this, if DCO consent is to be granted, we consider that a proportionate enhancement scheme for the IoA NL and ENP should be provided to compensate for the adverse effects of the Mona Array on these nationally important landscapes. In this regard, we consider a requirement similar to R24 (in terms of the principle of requiring an enhancement scheme for compensation) would be appropriate for the Mona Offshore Wind Farm DCO.</p>
The Applicant NRW (A)	<p><b>National Landscapes</b></p> <p>In exercising or performing any functions in relation to, or so as to affect, land in an AONB (now National Landscapes), Section 85 of the Countryside and Rights of Way Act places a duty on the relevant authority to have regard to the purpose of conserving or enhancing the natural beauty of the AONB.</p> <ul style="list-style-type: none"> <li>• Can the Applicant provide comments on why it considers the relevant authority could be satisfied the duty placed on it would be complied with if development consent for the Proposed Development were to be granted?</li> <li>• Can NRW comment on if the implementation of a suitable enhancement</li> </ul>	<p>Q1.20.12</p> <p>The duty is intended to ensure the purpose of the designation is considered in decision making. Whilst an enhancement scheme would not directly mitigate the adverse effects of the offshore components, it would enable the conservation and enhancement of other aspects of the affected landscapes, thereby supporting the purpose for which the designation exists in relation to any such aspects. The decision on granting consent lies with the ExA, and it is for the ExA, taking into consideration all relevant information, whether or not the implementation of a suitable enhancement scheme as described would allow the duty to be complied with.</p>

Question to:	Question:	NRW RESPONSE
	scheme as described above would allow the duty to be complied with?	
NRW (A)	<p><b>Lighting effects on National Landscapes</b></p> <p>In [REP1-056] paragraph 416, it states that based upon previous experience, you consider that the aviation warning lighting for Mona Offshore Wind Farm is “expected to be visible from the northern coast loA and the impact on dark skies would not be negligible”.</p> <ul style="list-style-type: none"> <li>• Can you provide further detail or information concerning what you consider to be the impacts of the aviation warning lighting on the dark skies within the loA National Landscape?</li> <li>• Can you comment on the intensity levels specified by the Applicant in Table 8.18 [APP-060] and how these would affect the loA dark skies?</li> </ul>	<p>Q1.20.14</p> <p>We note Table 8.18 [APP-060] states the turbine aviation warning lights would be operated at the lowest permissible intensity level (200 candelas (cd)) in good visibility conditions. By ‘good visibility’ we assume the Applicant means exceeding 5km. If this mitigation measure was secured as a Requirement of the DCO, we advise it is expected to reduce the impact of the lighting on receptors within the loA NL to a negligible level compared with lighting viewed at the full intensity (2000 cd) in good visibility, which would otherwise result in impacts greater than negligible.</p> <p>Based on emerging guidance on this issue, we advise an aviation warning light at 200 cd viewed at the closest location within the loA NL (29km distance) in clear weather would, broadly, be the same as viewing a car brake light at approximately 17.4km<sup>19</sup>. This change is expected to be difficult to discern.</p> <p>There is the potential for warning lights to be viewed at 2000 cd in clear weather, even where automatic dimming mitigation is included. For example, this may occur where patchy cloud on one side of the wind farm results in the maximum intensity being triggered, even though the other side of the wind farm is in clear conditions. It is not known how often this might occur.</p>

<sup>19</sup> Based on assumption that, for a car brake light (typically 80 cd) to appear to an observer as the same intensity as a 200 cd aviation warning light, it would need to be viewed at roughly 0.6 times the distance.