

MONA OFFSHORE WIND PROJECT

Annex 3.5 to the Applicant's response to Relevant Representations at the Procedural Deadline

Applicant's Response to Relevant Representation from Natural Resources Wales (NRW): RR-011.111

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Image of an offshore wind farm

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
Mona 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), operational access to the Onshore Substation and the connection to National Grid infrastructure will be located
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.

Acronyms

Acronym	Description
CEA	Cumulative Effects Assessment
CoCP	Code of Construction Practice
EIA	Environmental Impact Assessment
MDS	Maximum Design Scenario
NPS	National Policy Statement
NRW	Natural Resources Wales
PEIR	Preliminary Environmental Information Report
PPW	Planning Policy Wales
RBMP	River Basin Management Plan
SAC	Special Area of Conservation
SPA	Special Protection Area
SWMI	Significant Water Management Issues
TAN	Technical Advice Note
WFD	Water Framework Directive

Units

Unit	Description
km	Kilometre

1 APPLICANT'S RESPONSE TO RELEVANT REPRESENTATION FROM NATURAL RESOURCES WALES (NRW): RR-011.111

1.1 Introduction

1.1.1.1 This document has been prepared in response to Natural Resource Wales' (NRW's) Relevant Representation RR-011.111 In combination effects and cumulative effects, which states:

We advise a summary within the WFD compliance assessment would be beneficial as noted in our comments to the PEIR (1 June 2023 Our Ref: AOS-21167-0026), we note the signposting to F3.2 Environmental Statement Hydrology and Flood Risk [APP-065]. However, we advise that the WFD compliance assessment should consider the cumulative effects from other projects.

1.2 Response

1.2.1.1 The response to the relevant representation outlined in Section 1 is dealt with in two parts:

1. Summary of the WFD compliance assessment;
2. Cumulative Effects Assessment (CEA).

1.3 Summary of the WFD compliance assessment

1.3.1.1 A Water Framework Directive (WFD) compliance assessment has been undertaken for the onshore elements of the Mona Offshore Wind Project. The assessment considered water bodies that are within, intersect or which are hydrologically connected to the Mona Onshore Development Area. This included surface water, groundwater and coastal and transitional water bodies. The assessment is based on guidance developed by the Environment Agency and Planning Inspectorate and is undertaken in a staged approach to ensure that those components of the Mona Offshore Wind Project and the associated activities are assessed in the context of the quality elements that contribute to overall WFD status.

1.3.1.2 The key focus of the assessment was to ensure that the onshore elements of the Mona Offshore Wind Project do not result in a deterioration in the current WFD status of the water bodies within the WFD assessment study area, based on the 2021 baseline as reported in the Western Wales River Basin Management Plan (RBMP) 2021-2027, and also to ensure that the Mona Offshore Wind Project does not compromise the achievement of the WFD objectives for the improvement in the overall status of these water bodies. The assessment also considers the protected areas linked to the water bodies in question and ensures that the protected area objectives are also unaffected. The WFD assessment study area included the following water bodies (as shown on Figures 1.1 and 1.2 of Volume 7, Annex 2.4: Water Framework Directive Surface Water and Groundwater Assessment (APP-120)):

- Nant y Fedw (Dulas) (GB110066059830) river water body;
- Dulas - lower (GB110066059860) river water body;
- Pont Robin Cut (Bodelwyddan) (GB110066059970) river water body;
- Gele (GB110066059980) river water body;
- Elwy - Clwyd to Melai, (GB110066060020) river water body;
- Clywd (GB541006608000) transitional water body;
- North Wales (GB641011650000) coastal water body;
- Clwyd Permo-Triassic Sandstone (GB41001G202100) groundwater body;

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- Clwyd Silurian (GB41002G200100) groundwater body;
- Conwy (GB41002G203000) groundwater body

1.3.1.3 The protected areas linked to the water bodies within the WFD assessment study area include drinking waters in the groundwaters, bathing waters in the North Wales coastal water body and the Clywd transitional water body and European sites in the North Wales coastal water body and the Elwy - Clwyd to Melai river water body.

1.3.1.4 The scoping stage of the WFD compliance assessment concluded that there were a number of components and activities associated with onshore elements of the Mona Offshore Wind Project that represented a risk to the WFD status and objectives and therefore were scoped into the assessment as summarised in Table 1.1 and Table 1.2.

Table 1.1: Outcome of scoping assessment for the WFD compliance assessment for onshore surface water bodies in the WFD assessment study area

Potential Impact	Biological supporting elements	Hydro-morphological supporting elements	Physico-chemical supporting elements	Chemical
The impact of habitat disturbance the supporting hydromorphological conditions of water bodies during construction, operations and maintenance and decommissioning of the Mona Onshore Development Area	Scoped in	Scoped in	Scoped in	Scoped out
The impact of pollution caused by accidental spills/contaminant release during construction and decommissioning of the Mona Onshore Development Area	Scoped in	Scoped out	Scoped in	Scoped out
Increase in suspended sediments due to construction, operational and maintenance and/or decommissioning related activities, and the potential impact to physical features	Scoped in	Scoped in	Scoped in	Scoped in
The impact of spreading INNS during construction and decommissioning of the Mona Onshore Development Area	Scoped in	Scoped in	Scoped in	Scoped in
Electromagnetic Fields (EMFs) from cabling during the operation of the Mona Onshore Development Area	Scoped out	Scoped out	Scoped out	Scoped out

Table 1.2: Outcome of scoping assessment for the WFD compliance assessment for groundwater bodies in the WFD assessment study area

Potential Impact	Quantitative Status	Chemical Status
The impact of pollution caused by accidental spills/contaminant release during construction and decommissioning of the Mona Onshore Development Area	Scoped out	Scoped in
Deterioration in groundwater quality in glacial till and bedrock aquifers through the disturbance and mobilisation of existing areas of contaminated land associated with recent or historical land-use and the Llanddulas Beach Landfill site.	Scoped out	Scoped in
Alteration to groundwater quantity or quality in the glacial till superficial aquifers, Clywd Limestone Group bedrock aquifer (Principal aquifer) and Ffernant Formation and Warwickshire Group (Secondary A aquifers).	Scoped in	Scoped in

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- 1.3.1.5 The relevant quality elements contributing to the overall status were considered and how each potential impact could affect these. As part of the project design process, a number of designed-in measures have been proposed to reduce the potential impacts for the water environment. As there is a commitment to implementing these measures, they are considered inherently part of the design of Mona Onshore Development Area and have therefore, been considered in the assessment presented in this detailed WFD compliance assessment. These measures are considered standard industry practice for this type of development. The construction measures set out below are contained within the Outline Code of Construction Practice (CoCP) (APP-212) which is secured through a Requirement of the draft Development Consent Order.
- 1.3.1.6 The detailed assessment demonstrates that taking into consideration the mitigation measures committed to through the Mitigation and Monitoring Schedule (APP-196) will ensure that there will be no deterioration in the individual elements of ecological and chemical status and therefore, no deterioration in the overall WFD status classification. Furthermore, the Mona Offshore Wind Project will not compromise the protected area objectives for these water bodies.
- 1.3.1.7 The overall conclusion of the WFD compliance assessment is that there will be no risk of deterioration in status as a result of the Mona Offshore Wind Project nor will the Mona Offshore Wind Project compromise the achievement of the environmental objectives, including protected area objectives for the water bodies within the WFD assessment study area.

1.4 Cumulative Effects Assessment (CEA)

1.4.1 Methodology

- 1.4.1.1 The Cumulative Effects Assessment (CEA) takes into account the impact associated with the Mona Offshore Wind Project together with other projects and plans. The projects and plans selected as relevant to the CEA presented within this chapter are based upon the results of a screening exercise (see Volume 5, Annex 5.1: Cumulative effects screening matrix (APP-084)). Each project has been considered on a case-by-case basis for screening in or out of the WFD assessment based upon data confidence, effect-receptor pathways and the spatial/temporal scales involved.
- 1.4.1.2 The Water Framework Directive surface water and groundwater assessment CEA methodology has followed the methodology set out in Volume 1, Chapter 5: EIA methodology (APP-052). As part of the assessment, all projects and plans considered alongside the Mona Offshore Wind Project have been allocated into 'tiers' reflecting their current stage within the planning and development process, these are listed below.
- 1.4.1.3 A tiered approach to the assessment has been adopted, as follows:
- Tier 1
 - Under construction
 - Permitted application
 - Submitted application
 - Those currently operational that were not operational when baseline data were collected, and/or those that are operational but have an ongoing impact
 - Tier 2
 - Scoping Report has been submitted and is in the public domain
 - Tier 3

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- Scoping Report has not been submitted or is not in the public domain
- Identified in the relevant Development Plan
- Identified in other plans and programmes.

1.4.1.4 This tiered approach is adopted to provide a clear assessment of the Mona Offshore Wind Project alongside other projects, plans and activities. The specific projects, plans and activities screened into the CEA, the water bodies within which they are located and the assessments or representations relevant to the WFD assessment are outlined in Table 1.3. Figure 1.1 illustrates the location of these other projects, plans and activities.

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Table 1.3: List of other projects, plans and activities considered within the CEA

Project/Plan	Status	Water body	Distance from the Mona Onshore Development Area (km)	Distance to Onshore Substation (km)	Description of project/plan	Assessments or Representations relevant to the CEA for WFD	Dates of construction (if applicable)	Dates of operation (if applicable)	Overlap with the Mona Offshore Wind Project
Tier 1									
Awel y Môr Offshore Wind farm (Onshore Infrastructure)	Application Determined	Clwyd transitional water body Pont Robin Cut (Bodelwyddan) river water body Gele river water body	0	0.1	Application for the construction of an offshore windfarm. Consent granted in Q3 2023.	A WFD Assessment has been completed for this project. The WFD Assessment concluded that <i>"the proposed development at AyM is considered to be compliant with the objectives of the Directive and will not result in the deterioration in status of relevant WFD waterbodies, or associated protected areas, both alone and in-combination with other projects, plans and activities."</i>	Construction to commence in 2026.	Site to be commissioned by 2030.	Yes
Major Development: 40/2017/1232	Approved	Pont Robin Cut (Bodelwyddan) river water body	0.64	1.09	Application for the erection of the seven industrial units with associated parking, landscaping and external storage areas.	Works at the site must be carried out in accordance with GPP6: 'Working at construction and demolition sites' All oil storage facilities must comply with the Water Resources (Control of Pollution) (Oil Storage) (Wales) Regulations 2016.	Not provided but assumed to overlap with Mona Offshore Wind Project	Not provided but assumed to overlap with Mona Offshore Wind Project	Yes
Major Development: 46/2021/0159	Approved	Pont Robin Cut (Bodelwyddan) river water body	0.23	0.80	Application for the erection of a commercial vehicle sales unit (sui generis). Formation of associated parking area, landscaping and associated works. Outline Planning application for the erection of five business buildings.	For the surface water disposal from the lorry park area (phase 1) requires the installation of a full retention oil water separator to be protective of controlled waters in the local area.	Not provided but assumed to overlap with Mona Offshore Wind Project	Not provided but assumed to overlap with Mona Offshore Wind Project	Yes
Major Development 40/2021/0309	Approved	Pont Robin Cut (Bodelwyddan) river water body	1.01	1.56	Erection of a 198 bed Registered Care Home (Use Class C2), landscaping, parking facilities and associated works (Resubmission).	Planning conditions require pollution prevention measures to be implemented in accordance with Guidance for Pollution Prevention (GPP)	Construction to commence in 2024.	N/A	Yes
Major Development 0/42900	Approved	North Wales coastal water body	0.32	9.15	Erection of 156 dwellings, access works and landscaping.	All works at the site must be carried out in accordance with GPP5 'Works in, near or over watercourses' and GPP6 'Working at Construction and demolition sites'	Not provided but assumed to overlap with Mona Offshore Wind Project	Not provided but assumed to overlap with Mona Offshore Wind Project	Yes
Major Development: 0/43877	Approved	Dulas – lower river water body	1.02	11.68	Demolition of derelict dwelling and outbuildings, proposed residential development of 15 dwellings including road widening (outline planning permission) (Approval of Matters Reserved for Subsequent Approval Under Code reference: 0/37619).	No water quality/WFD related representations that would result in cumulative effects for this water body with the Mona Offshore Wind Project	Not provided but assumed to overlap with Mona Offshore Wind Project	Not provided but assumed to overlap with Mona Offshore Wind Project	Yes

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Project/Plan	Status	Water body	Distance from the Mona Onshore Development Area (km)	Distance to Onshore Substation (km)	Description of project/plan	Assessments or Representations relevant to the CEA for WFD	Dates of construction (if applicable)	Dates of operation (if applicable)	Overlap with the Mona Offshore Wind Project
Major Development: 0/44621	Approved	Dulas – lower river water body	0.98	11.82	Demolition of single storey extensions to and the remodelling & refurbishment of the Fair View Inn into a 6 person 4 bedroom house. The construction of 24 new build 1 and 2 bedroom apartments over 3 and 2.5 storeys with associated car parking and ancillary facilities.	All works at the site must be carried out in accordance with GPP6 'Working at Construction and demolition sites'. Should contaminated land be uncovered the EA guiding principles for land contamination should be followed.	Not provided but assumed to overlap with Mona Offshore Wind Project	Not provided but assumed to overlap with Mona Offshore Wind Project	Yes
Major Development: 0/47217	Approved	Gele river water body	0.9	8.12	Residential Housing Estate consisting of 14. No new residential dwelling houses (Outline Application)	Foul Drainage – first preference is to connect to public sewer All works at the site must be carried out in accordance with GPP5 'Works in, near or over watercourses' and GPP6 'Working at Construction and demolition sites'	Not provided but assumed to overlap with Mona Offshore Wind Project	Not provided but assumed to overlap with Mona Offshore Wind Project	Yes
Major Development: 0/49141	Approved	Gele river water body	0.97	8.04	Demolition of existing buildings and erection of an over 55s affordable housing development comprising of 43 apartments, access, parking, landscaping, drainage infrastructure and associated development.	No water quality/WFD related representations that would result in cumulative effects for this water body with the Mona Offshore Wind Project	Not provided but assumed to overlap with Mona Offshore Wind Project	Not provided but assumed to overlap with Mona Offshore Wind Project	Yes
Major Development: 0/50854	Application submitted 22/06/2023	Gele river water body North Wales Coastal Water body	1.03	7.94	Certificate of Lawful Development for the siting of 393 static caravan units with 12 month occupancy in any year plus 12 touring caravans with occupancy between 21st March and 31st October inclusive.	This is an existing caravan site with existing services and infrastructure the application is for a certificate of lawful development, there is no potential for cumulative effects in the water bodies affected.	Not provided but assumed to overlap with Mona Offshore Wind Project	Not provided but assumed to overlap with Mona Offshore Wind Project	Yes
Major Development: 0/48393	Approved	Gele river water body	0.9	8.12	Details of the appearance of the development and the landscaping to the development site.	No water quality/WFD related representations that would result in cumulative effects for this water body with the Mona Offshore Wind Project	Not provided but assumed to overlap with Mona Offshore Wind Project	Not provided but assumed to overlap with Mona Offshore Wind Project	Yes
Tier 3									
St. Asaph Solar Farm	Pre-application	Elwy - Clwyd to Melai river water body	0	0.87	A proposed solar farm with a potential generating capacity of between 10MW and 350MW.	No information has been provided	Not provided but assumed to overlap with Mona Offshore Wind Project	Not provided but assumed to overlap with Mona Offshore Wind Project	Yes

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Project/Plan	Status	Water body	Distance from the Mona Onshore Development Area (km)	Distance to Onshore Substation (km)	Description of project/plan	Assessments or Representations relevant to the CEA for WFD	Dates of construction (if applicable)	Dates of operation (if applicable)	Overlap with the Mona Offshore Wind Project
NGET 31/2023/0525	Pre-application (EIA screening request)	Pont Robin Cut (Bodelwyddan) river water body	0.03	0.41	Extension to the existing Bodelwyddan electricity substation (EIA Screening Opinion request).	No information has been provided	Not provided but assumed to overlap with Mona Offshore Wind Project	Not provided but assumed to overlap with Mona Offshore Wind Project	Yes
NGET	Pre-application	N/A	0.03	0.41	Application under section 37 of the Electricity Act 1989 for the installation of new overhead lines.	N/A	Not provided but assumed to overlap with Mona Offshore Wind Project	Not provided but assumed to overlap with Mona Offshore Wind Project	Yes
NGET	Pre-application	N/A	0.03	0.41	Permitted development comprising extension to the GIS hall required to facilitate the extension to the existing Bodelwyddan electricity substation	N/A	Not provided but assumed to overlap with Mona Offshore Wind Project	Not provided but assumed to overlap with Mona Offshore Wind Project	Yes

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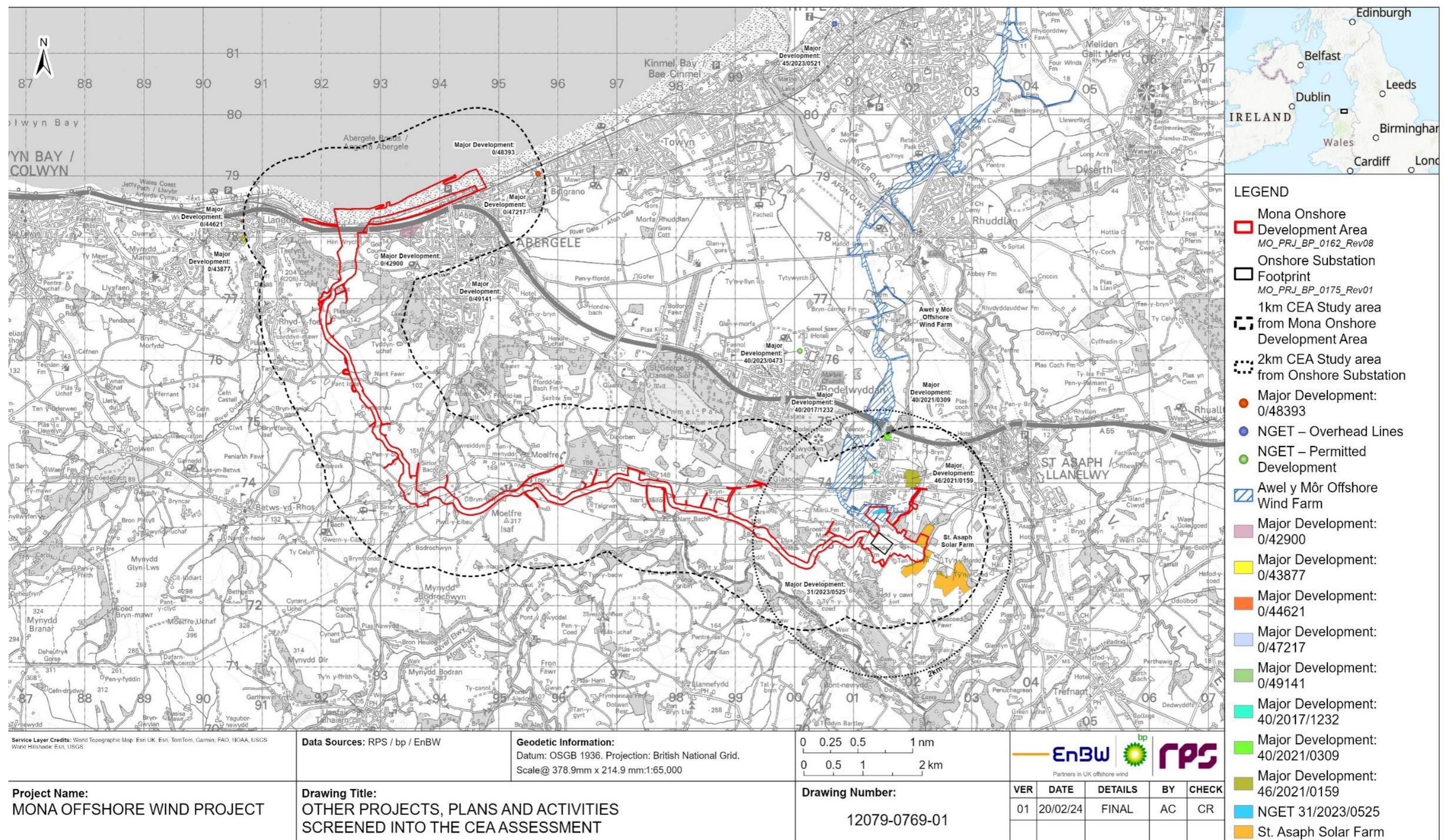


Figure 1.1: Other projects, plans and activities screened into the cumulative effects assessment

1.4.2 Maximum Design Scenario

- 1.4.2.1 The MDS identified in Table 1.4 have been selected as those having the potential to result in the greatest effect on an identified receptor or receptor group. The cumulative effects presented and assessed in this section have been selected from the Project Design Envelope provided in Volume 1, Chapter 3: Project description (APP-050) as well as the information available on other projects and plans, in order to inform an MDS. Effects of greater adverse significance are not predicted to arise should any other development scenario, based on details within the Project Design Envelope (e.g. different wind turbine layout), to that assessed here, be taken forward in the final design scheme.
- 1.4.2.2 The CEA has considered the Mona Offshore Wind Project, alongside the National Grid Bodelwyddan substation extension proposal. The information publicly available up to three months before application (see Volume 1, Chapter 5: Environmental Impact Assessment Methodology (APP-052)) was considered in this CEA. The CEA has therefore been undertaken based on the latest available information in the public domain which is the Autumn 2023 consultation material (National Grid, 2023). If further information is available for the proposal before the decision on the Mona Offshore Wind Project, the Applicant will provide an update to the cumulative assessment..
- 1.4.2.3 The MARES Connect project is proposing to submit a planning application in 2024 for an interconnector cable, landfall, and onshore substation with connection to the National Grid. The project has identified several landfall zones and zones for its onshore substation and there is the potential for overlap with the Mona Onshore Development Area. The CEA has not considered the Mona Offshore Wind Project, alongside the MARES Connect project as insufficient information was publicly available prior to the Mona Offshore Wind Project DCO submission (see Volume 1, Chapter 5: Environmental Impact Assessment Methodology (APP-052)). However, if further information is available for the proposal before the decision on the Mona Offshore Wind Project, the Applicant will provide an update to the cumulative assessment.

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Table 1.4: Maximum design scenario considered for the assessment of potential cumulative effects for WFD Assessment

Potential impact	Phase			Maximum Design Scenario	Justification
	C	O	D		
The impact of habitat disturbance and its impact on the supporting hydromorphological conditions of water bodies during construction, operations and maintenance and decommissioning of the Mona Onshore Development Area	✓	✓	✓	MDS as described for the Mona Offshore Wind Project (Table 1.13 of Volume 7, Annex 2.4: Water Framework Directive surface water and groundwater assessment [APP-120]) assessed cumulatively with the following other projects/plans: Tier 1	The MDS assumes that there is an overlap in the construction timeframes of these projects and the Mona Offshore Wind Project
The impact of pollution caused by accidental spills/contaminant release during construction and decommissioning of the Mona Onshore Development Area	✓	x	✓	Awel y Môr Offshore Wind farm (onshore infrastructure) Major Development: 40/2017/1232 Major Development: 46/2021/0159 Major Development 40/2021/0309 Major Development 0/42900	
Increase in suspended sediments due to construction, operational and maintenance and/or decommissioning related activities, and the potential impact to physical features	✓	x	✓	Major Development: 0/43877 Major Development: 0/44621 Major Development: 0/47217 Major Development: 0/49141 Major Development: 0/50854	
The impact of spreading Invasive and Non-native Species (INNS) during construction and decommissioning of the Mona onshore development area	✓	x	✓	Major Development: 0/48393 Tier 3 St Asaph Solar Farm Major Development 31/2023/0525 (NGET) NGET – overhead lines NGET – Permitted development	

1.4.3 Cumulative effects assessment

- 1.4.3.1 In line with the detailed assessment undertaken in Volume 7, Annex 2.4: Water Framework Directive surface water and groundwater assessment (APP-120) the CEA establishes whether the activities associated with Mona Offshore Wind Project will:
- Cause deterioration in water body status
 - Impact upon protected areas objectives designated under the European Directives listed in Article 5 of the WFD
 - Prevent the achievement of WFD status objectives.
- 1.4.3.2 The CEA demonstrates that the Mona Offshore Wind Project, when considered will not cause a deterioration in status of any of the contributing quality elements nor prevent the achievement of WFD status objectives. Where appropriate it is also the stage where design mitigation, aimed at reducing the effect of an activity, is discussed.
- 1.4.3.3 The assessment looks at each individual water body traversed by Mona Onshore Development Area in the context of its status, the main contributing elements to the status classification, the objective of the water body and scoped in activities.
- 1.4.3.4 The CEA considers the projects, plans or activities within each water body considered in the WFD Assessment (identified in Table 1.3). Consideration was also given to the downstream water bodies and whether there would be potential for cumulative effects that would impact on the environmental objectives of these water bodies.
- 1.4.3.5 As part of the project design process, a number of designed-in measures have been proposed to reduce the potential impacts for the water environment. As there is a commitment to implementing these measures, they are considered inherently part of the design of Mona Offshore Wind Project and have therefore, been considered in the CEA. These measures are set out in the Volume 7, Annex 2.4: Water Framework Directive surface water and groundwater assessment (APP-120).
- 1.4.3.6 The Western River Basin Management Plan (NRW, 2022a) states that the 2021 water body classification is the baseline from which deterioration is not permitted and therefore, this is the status classification that must not deteriorate when considering the cumulative effects of the Mona Offshore Wind Project on the 'no deterioration of water body status objective'.
- 1.4.3.7 Taking into consideration the mitigation measures committed to through the CoCP (APP-212) and the supporting management plans such as the Outline Spillage Prevention and Emergency Response Plan (APP-212) and the Outline Biosecurity Protocol (APP-223) there will be no deterioration in the overall WFD status classification, the protected area objectives or on the ability of the water bodies to achieve their environmental objectives as a result of the Mona Offshore Wind Project.
- 1.4.3.8 The cumulative effects assessment has been undertaken on this basis.

Deterioration in water body status

Tier 1

1.4.3.9 The documentation for the Tier 1 projects listed in Table 1.3 have been reviewed and the relevant assessments and representations made on each project have been summarised in Table 1.3. Given the measures outlined for each project in the different water bodies traversed by the Mona Offshore Wind Project there is no potential for cumulative effects that would cause a deterioration in the status of these water bodies.

Tier 3

1.4.3.10 At the time of writing, no information is available within the public domain to confirm how these projects could impact on the water body status. It is assumed, where relevant, in accordance with National Policy Statement (NPS), Planning Policy Wales (PPW) and Technical Advice Note (TAN)15, developments would be required to implement a series of construction, operation and decommissioning mitigation measures to provide appropriate management techniques. These management techniques will ensure that the surface water and groundwater status will not deteriorate and therefore there is no potential for significant cumulative effects.

Impact on the Protected Area Objectives

Tier 1

1.4.3.11 The assessment of these projects, particularly the Awel y Môr Offshore Wind farm (onshore infrastructure), has established that there is no potential for significant effects on the protected area objectives for the bathing waters, National Site Network (European Sites), shellfish waters, drinking waters or nutrient sensitive zones. Therefore based on this assessment and the fact that the Mona Offshore Wind Project will not result in significant effects on these protected areas means that there will be no significant cumulative effects that would compromise the achievement of the objectives for those water dependent protected areas within and hydrologically linked to the WFD assessment study area.

Tier 3

1.4.3.12 At the time of writing, no information is available within the public domain to confirm how these projects could impact on the water body status. It is assumed, where relevant, in accordance with NPS, PPW and TAN15, developments would be required to implement a series of construction, operation and decommissioning mitigation measures to provide appropriate management techniques. These management techniques will ensure that the protected area objectives will not be compromised and therefore there is no potential for significant cumulative effects.

Prevent the achievement of WFD status objectives

Tier 1

1.4.3.13 Table 1.20 of Volume 7, Annex 2.4: Water Framework Directive surface water and groundwater assessment (APP-120) outlines the objectives for each water body within the WFD assessment study area of the Mona Onshore Development Area and the key quality elements driving the status. The Significant Water Management Issues (SWMI), where known, resulting in a status of less than good are summarised and the measures that are recommended in the RBMP to achieve the WFD objectives are identified. Currently there

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are a number of the water bodies that are not achieving good status and, in some cases, as highlighted in Table 1.20 of Volume 7, Annex 2.4: Water Framework Directive surface water and groundwater assessment (APP-120), less stringent objectives will be necessary as certain water bodies are not predicted to be achieving good status by the end of the third river basin management cycle, (i.e. 2027). The final column of Table 1.20 assesses the potential impact on the achievement of the WFD objectives and concludes for all water bodies that Mona Onshore Development Area will not prevent the achievement of the WFD objectives. Based on this assessment and considering the assessment and representations submitted for the Tier 1 projects, as outlined in Table 1.3 of this annex, there is no potential for cumulative effects that would prevent the achievement of the environmental objectives for the relevant water bodies. This conclusion is based on the fact that the Mona Offshore Wind Project and the Tier 1 projects will not compromise the implementation of the programme of measures include in the Western River Basin Management Plan.

Tier 3

1.4.3.14 It is assumed, where relevant, in accordance with NPS, PPW and TAN15, these developments would be required to implement a series of construction, operation and decommissioning mitigation measures to provide appropriate management techniques. These management techniques will ensure there is no potential for significant cumulative effects and therefore that the achievement of the environmental objectives of the water bodies will not be compromised.

1.5 Conclusions

1.5.1.1 The assessment of cumulative effects has been undertaken based on whether the Mona Offshore Wind Project when considered alongside other projects/plans will:

- Cause deterioration in water body status
- Impact upon protected areas objectives designated under the European Directives listed in Article 5 of the WFD
- Prevent the achievement of WFD status objectives.

1.5.1.2 Overall, it is concluded that there will be no significant cumulative effects from the Mona Offshore Wind Project alongside other projects/plans and the three scenarios outlined in Section 1.5.1.1 will not occur and therefore the Project is WFD compliant.