

28th Jul 2024

Mona Offshore Wind Project: Wildlife Trust Wales Written Submission PDA-050 Summary

Interested Party Reference number: MNOW- SP199

This is a summary of Mona Offshore Wind Farm Examination Library Written Submission PDA-050, from Wildlife Trust Wales (WTW) on behalf of The North Wales Wildlife Trusts (NWWT).

TWT are a movement of 46 independent Wildlife Trusts (including NWWT) covering the UK, the Isle of Man and Alderney, and are the largest UK voluntary organisation dedicated to conserving all the UK's habitats and species, whether in the countryside, towns or at sea. We improve places for wildlife and strengthen the relationship between people and the natural environment. Our aim is to protect and create resilient ecosystems on land and in the sea.

WTW supports the development of offshore wind and other marine renewable energy projects which will play a part in delivering a resilient and decarbonised energy supply, but, this industrialisation of the seascape has environmental impact and this must be strategically prevented, mitigated, and as a last resort, compensated for in order to ensure the recovery of this already degraded environment. Marine net gain should be proportional to the size and impact of the individual project, but ensure that the measures are mutually inclusive of other project restoration deliverables.

Yours faithfully,

Benjamin Smith

WTW Marine Planning Officer (Wales)

Summary of Mona Offshore Wind Farm Examination Library Written Submission PDA-050:

Mona Array Area

The Mona Array represents ~450km² area of potential benthic change by the introduction of OWF infrastructure creating hard substrate in a predominantly soft sediment environment. This will change the benthic biotope and introduce a bottom up pressure. This represents a shifting baseline, and the cumulative effect that Mona and other OWF projects in this area exert needs to be thoroughly understood.

Export Cable Corridor and Cabling

WTW advocate for a risk aware, as opposed to risk averse, approach to Export Cable Corridor (ECC) route planning, with the needs of the project shouldering the greater apportion of risk. The opportunity to adopt innovative solutions in ECC route selection as opposed to *routes of least resistance* when embraced by the developer will demonstrate a commitment to sustainability over CAPEX considerations. The selected route passes through designations and makes landfall in the vicinity of a SSSI. HDD will be used to bring the cable ashore but concerns regarding impact on sensitive reef and soft sediment features remain.

Underwater noise

The project has opted for suction bucket jacket foundations but retained the right to pile. The piling strategy if required should be sequential, adopting at least soft start protocols as mitigation. Determination of TTS and PTS should be made relative to the most acoustically sensitive species in the ZoI. A baseline assessment of underwater noise must be undertaken in order to properly determine the projects noise impact including the use of ADD, construction noise, and that from increased shipping. Prior to the determination of an underwater noise standard the project must employ the precautionary principle with respect to receptor impact.