

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN
United Kingdom

JNCC Reference: OIA-10357
JNCC Registration ID Number: 20048439
PINS Reference: EN010137
Date: 7 August 2024

By email: monaoffshorewindproject@planninginspectorate.gov.uk

To whom it may concern,

Mona Offshore Wind Project – Summary of Written Representation

The following provides a summary of the Mona Offshore Wind Project Development Consent Order (DCO) Application – Environmental Statement and Management Plans (EN010137) Written Representation submitted by JNCC on 7 August 2024. JNCC's remit and concerns cover ornithological, marine mammal and benthic receptors within UK offshore waters (beyond the territorial limit).

Ornithology

We disagree with several approaches the Applicant has taken to the assessment of offshore ornithology within the Environmental Statement and the Habitat Regulations Assessment (HRA). In addition, there are multiple errors within the tables and text of the application documentation and errors when using values in subsequent stages of the assessment, and many aspects of the assessment have been difficult to follow in terms of what has been done or where parameters used have come from. Therefore, JNCC currently does not have confidence in the results, nor are we able to agree with the overall conclusions, either within the EIA or the HRA, particularly with regards to Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro Special Protected Area (SPA).

Further, elements of JNCC advice appear to have been either misinterpreted, or our advice has been taken on board in some circumstances but not in others despite agreement during pre-application consultation. We highlight these disagreements, errors, and unclear aspects in detail in our Written Representations, but note that while we have endeavoured to identify errors to the best of our ability with the time available, these may not be an exhaustive list of all errors. We note that it is stated in several places in the Applicant's Response to Relevant

Representations (PDO-008) that various elements of the application have been checked and are either correct or will be included in the Errata document to be submitted at Deadline 1, which we look forward to providing our comments on in due course.

In our Written Representations, we provide comments on the following thematic areas of concern:

1. Presenting SNCB recommended approaches to assessments in Application documentation
2. Updating Application Documentation (ES, HRA, and associated documents and appendices)
3. Multiple, potentially compounding errors
4. Workings out needing to be shown throughout
5. Misrepresented SNCB advice
6. Deviating from previously agreed approaches
7. Measures to mitigate displacement by vessels of red-throated diver and common scoter in the Liverpool Bay/Bae Lerpwl SPA
8. Cumulative and in-combination assessments

We also provide comments on specific areas of concern

- Seasonal definitions
- Foraging ranges
- Displacement assessments
- Collision risk modelling
- Assigning age-class to individuals
- Apportioning individuals to SPAs
- Reference populations
- Population Viability Analysis
- Cumulative and in-combination assessments
- SPA features
- HRA

Please note that JNCC can only comment on sites for which we have jurisdiction (UK marine sites wholly or partly in waters beyond 12nm). We note that NRW and Natural England (NE) have been involved in pre-application discussions and defer to those agencies on their respective sites. We also note that a number of SPAs in Irish and Scottish waters are screened in at Likely Significant Effect (LSE), and recommend consultation with the relevant nature conservation advisers. There is a risk of not receiving advice on specific SPAs within other nations, or on the UK Marine Protected Area (MPA) network if the relevant SNCBs are not consulted.

Marine Mammals

We disagree with a number of approaches being taken by the Applicant within the Environmental Statement and the HRA. The main point regarding the clearance on unexploded ordnance (UXO) has been raised previously with the Applicant. We have stated

previously that we do not agree with UXO clearance being included within the Development Consent Order (DCO) and draft Marine Licence (dML).

Within our Written Representations, we have provided comments on the following areas of concern:

1. The inclusion of unexploded ordnance (UXO) clearance within the assessment (paragraphs 88-94)
2. The use of 'scare charges' (paragraph 95)
3. Due consideration of noise abatement (paragraphs 103-111)
4. Marine mammal collision risk (paragraphs 118-123)
5. Conclusions regarding the North Anglesey Marine SAC (paragraphs 124-126)

We also provide comment on missing links and references within documents.

Benthic Ecology

JNCC do not believe that the Applicant has assessed all impacts fully, particularly with regard to total infrastructure footprints, ancillary works requiring additional rock dump, and decommissioning operations.

In conjunction with the matters raised in our Relevant Representation, we have the following concerns:

Decommissioning operations have not been fully considered. JNCC appreciate that decommissioning will occur after a number of decades, however, it is important to consider all the impacts associated with decommissioning prior to construction and installation to ensure that all installations will be capable of being fully removed from the marine environment. It should also be noted that impacts should be considered permanent where infrastructure cannot be removed. JNCC have concerns around gravity-based foundations in this regard with further concerns around the need for additional rock dump to account for cable free spans, cable cut ends, and scour protection. Additional rock dump needs to be fully considered.

JNCC are concerned that the Applicant has reduced the sensitivity of the 'seapen and burrowing megafauna community' Important Ecological Features (IEF), and an OSPAR Threatened and Declining habitat, from 'High' to 'Medium'. We also believe that the magnitude of impact has been assessed as too low and the subsequent adverse significance has been under-represented.

To allow JNCC to accurately assess all impacts to the benthic environment from a development that spans terrestrial, inshore, and offshore waters, the offshore elements (those extending out from the 12nm territorial limit) need to be distinguished from those inshore (within 12nm). This is currently not addressed fully and without this level of detail, JNCC will not be able to adequately assess all the impacts.

Please contact me with any questions regarding the above summary.

Yours sincerely,

Jillian Whyte

Senior Marine Industries Adviser

[Redacted signature]

[Redacted contact information]