

MONA OFFSHORE WIND PROJECT

Mona and Natural Resource Wales (advisory) Offshore SoCG

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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).
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process. In addition, licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.

Acronyms

Acronym	Description
AA	Appropriate Assessment
AEoSI	Adverse Effect on Site Integrity
BDMPS	Biologically Defined Minimum Population Scales
CEA	Cumulative Effects Assessment
CRM	Collision Risk Modelling
DCO	Development Consent Order
EDR	Effective Deterrent Range
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EWG	Expert Working Group
ExA	Examining Authority
GEP	Good Ecological Potential
GES	Good Ecological Status
HDD	Horizontal Directional Drilling
HRA	Habitats Regulations Assessment
IEFs	Important Ecological Features
ISAA	Information to Support Appropriate Assessment
JNCC	Joint Nature Conservation Committee
LAT	Lowest Astronomical Tide
LCMS	Landfall Construction Method Statement

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Acronym	Description
LSE	Likely Significant Effect
MCZ	Marine Conservation Zones
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
NRW (A)	Natural Resources Wales Advisory
OCMS	Offshore Construction Method Statement
OSP	Offshore Substation Platforms
PEIR	Preliminary Environmental Information Report
PVA	Population Viability Analysis
RTD	Red-Throated Diver
SAC	Special Areas of Conservation
sCRM	stochastic Collision Risk Model
SLVIA	Seascape, Landscape and Visual Impact Assessment
SNCB	Statutory Nature Conservation Body
SoCG	Statement of Common Ground
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
UWSMS	Underwater Sound Management Strategy
UXO	Unexploded Ordnance
WFD	Water Framework Directive
ZOI	Zone of Influence

Units

Unit	Description
kV	Kilovolts

1 Initial Statement of Common Ground between Mona Offshore Wind Project and Natural Resources Wales Advisory - OFFSHORE

1.1 Introduction

1.1.1 Overview

1.1.1.1 This Initial Statement of Common Ground (SoCG) has been prepared between Mona Offshore Wind Limited (hereafter referred to as 'the Applicant') and Natural Resources Wales Advisory ('NRW (A)'), together the parties. The SoCG sets out the areas of current agreement, disagreement and in that context, matters of ongoing discussion between the parties in relation to the proposed Development Consent Order (DCO) application for the Mona Offshore Wind Project.

1.1.1.2 The need for a SoCG between the Applicant and NRW (A) is set out in section 1 of Appendix F of the Rule 6 letter issued by the Planning Inspectorate on 07 June 2024.

1.1.1.3 This document is intended to provide the Examining Authority (ExA) with an overview of the level of common ground between the parties. The SoCG will identify where agreement has been reached, where differences lie and the reasons for disagreement or outstanding matters and will facilitate further discussion between the parties. The SoCG will be updated during the Mona Offshore Wind Project Examination.

1.1.1.4 This SoCG relates to the offshore aspects of the Mona Offshore Wind Project and is one of three SoCGs between the Applicant and NRW (A) which cover the following broad areas of the DCO application:

- Offshore
- Onshore
- Seascape, landscape and visual impact assessment (SLVIA).

1.1.1.5 The three SoCGs should be read in conjunction with one another to clarify the Applicant and NRW (A)'s position on the DCO application as a whole. Topics which are covered in this SoCG are listed in paragraph 1.1.2.8.

1.1.1.6 The Applicant has engaged with NRW (A) on these SoCGs for Deadline 1 however the Applicant and NRW (A) acknowledge that additional work is required on the SoCGs as the Examination progresses.

1.1.2 Mona Offshore Wind Project Elements under NRW (A)'s Remit

1.1.2.1 NRW's remit, as set out in the relevant representation (RR-011) is to pursue the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources. All elements of the Mona Offshore Wind Project may be relevant to NRW (A) in its function as statutory consultee, covering the offshore, intertidal and onshore works. These are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) of the Draft DCO (PDA-003).

1.1.2.2 In addition to being an interested party under the Planning Act 2008, NRW exercises functions under legislation including (but not limited to) the Environmental Permitting (England and Wales) Regulations 2016 (as amended), Conservation of Habitats and Species Regulations 2017 and the Marine and Coastal Access Act 2009.

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- 1.1.2.3 NRW broadly has two main functions in relation to marine development:
- As a marine licencing authority (acting on behalf of the Welsh Ministers)
 - As an advisor and statutory consultee.
- 1.1.2.4 NRW's role as a licensing authority and statutory consultee are independent to ensure appropriate functional separation between them.
- 1.1.2.5 For the avoidance of doubt, this SoCG relates solely to NRW's advice in its capacity as a statutory consultee and advisor. This SoCG does not include the view of NRW Marine Licensing Function.
- 1.1.2.6 This SoCG covers the offshore receptors which have the potential to be impacted by the Mona Offshore Wind Project, seaward of Mean High Water Springs (MHWS), including the intertidal zone. In relation to the DCO regime, NRW (A) has engaged in the pre-application process, both through membership of the Expert Working Group (EWG) meetings via the Evidence Plan process, and through bi-lateral discussions pre- and post-application. Key consultation is presented in Table 1.2 and Table 1.3.
- 1.1.2.7 This SoCG covers the following offshore technical topics of the Mona Offshore Wind Project DCO application which are of relevance to NRW (A):
- Physical processes (including coastal processes)
 - Benthic subtidal and intertidal ecology (including coastal habitats)
 - Water Framework Directive – coastal and transitional waters: Offshore
 - Fish and shellfish ecology
 - Marine mammals
 - Offshore ornithology
 - Habitats Regulations Assessment (HRA).

1.1.3 Overview of Mona Offshore Wind Project

- 1.1.3.1 The Applicant has submitted an application for a DCO under the Planning Act 2008 for the construction, operation and maintenance of the Mona Offshore Wind Project, a proposed offshore wind farm located in the east Irish Sea. The Mona Offshore Wind Project will include both offshore and onshore infrastructure and consist of:
- **Mona Array Area:** This is where up to 96 wind turbines with maximum blade tip height above Lowest Astronomical Tide (LAT) of 364 m, up to four Offshore Substation Platforms (OSPs), foundations (for both wind turbines and OSPs), up to 325 km of inter-array cables and up to 50 km of interconnector cables will be located
 - **Mona Offshore Cable Corridor and Access Areas:** The corridor located between the Mona Array Area and the landfall up to MHWS, in which up to 360 km of offshore export cables will be located and in which the intertidal access areas are located
 - **Intertidal access areas:** The area from MHWS to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities
 - **Landfall:** This is where the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling

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- *Mona Onshore Development Area:* The area in which the landfall, Mona Onshore Cable Corridor (maximum length of up to 15 km), Mona Onshore Substation, mitigation areas, temporary construction infrastructure (such as access roads and construction compounds), operational access to the Mona Onshore Substation and the 400 kV connection to National Grid infrastructure will be located
- *Mona Onshore Substation:* This is where the new substation will be located, containing the components for transforming the power supplied from the offshore wind farm up to 400 kV
- *Mona 400 kV Grid Connection Cable Corridor:* The corridor from the Mona Onshore Substation to the National Grid substation with a maximum length of up to 1 km.

1.1.3.2 A description of the offshore and onshore components required for the construction, operation and maintenance and decommissioning phases of the Mona Offshore Wind Project is available in Environmental Statement Volume 1, Chapter 3: Project Description (APP-050).

1.1.4 Approach to SoCG

1.1.4.1 This initial SoCG has been developed during the DCO pre-examination phase and will be progressed during the examination phase of the Mona Offshore Wind Project. In accordance with discussions between the parties, the SoCG is focused on those issues raised by NRW (A) within its response to the Scoping Report, Section 42 consultation and as raised through the Evidence Plan Process that has underpinned the pre-application consultation between the parties. This initial SoCG also includes those issues raised by NRW (A) during the post-application phase (i.e. relevant representations and pre-examination meetings) and also considers the matters raised by the Applicant in response to relevant representations).

1.1.4.2 In accordance with discussions between the Applicant and NRW (A), the SoCG is focused on the topics listed in paragraph 1.1.2.7.

1.1.4.3 The structure of this SoCG is as follows:

- Section 1.1: Introduction
- Section 1.2: Summary of SoCG
- Section 1.3: Summary of consultation
- Section 1.4: Agreements log

1.2 Summary of SoCG

1.2.1 Overview

1.2.1.1 This initial SoCG outlines the consultation that has taken place between the parties to date, during the pre-application and post-application phase of the Mona Offshore Wind Project. The agreement logs present the position reached on 07 August 2024 (Deadline 1).

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1.2.2 Summary of Those Matters Agreed, Ongoing Points of Discussion and those Matters Not Agreed

1.2.2.1 Table 1.1 provides a summary of those matters agreed, ongoing points of discussion or not agreed between the parties.

Table 1.1: Summary of areas agreed, ongoing points of discussion and not agreed between the parties.

Topic	Agreement status
Physical processes	Some items agreed, some ongoing points under discussion
Benthic subtidal and intertidal ecology (including coastal habitats)	Some items agreed, some ongoing points under discussion
Water framework directive – coastal and transitional waters: Offshore	Some items agreed, some ongoing points under discussion
Fish and shellfish ecology	Some items agreed, some ongoing points under discussion
Marine mammals	Some items agreed, some ongoing points under discussion
Offshore ornithology	Some items agreed, some ongoing points under discussion
Habitat Regulations Assessment	Some items agreed, some ongoing points under discussion

1.3 Summary of consultation

1.3.1.1 Table 1.2 below provides a brief overview of the key consultation undertaken by the Applicant with NRW (A) during the *pre*-application (both statutory and non-statutory) phases of the Mona Offshore Wind Project.

1.3.1.2 Table 1.3 below provides a summary of the key consultation undertaken by the Applicant with NRW (A) during the *post*-application phases of the Mona Offshore Wind Project. The consultation presented is not exhaustive but provides an indication of aspects of key discussions undertaken. All attendees at the meetings listed in Table 1.2 are provided in the Technical Engagement Plan (APP-041) and Consultation Report (APP-037) however, for the avoidance of doubt, this SoCG is limited to matters between NRW (A) and the Applicant.

1.3.1.3 This initial SoCG makes reference to other documents submitted with the Mona Offshore Wind Project application that set out, in greater detail, the discussions that have taken place between NRW (A) and the Applicant. These documents are:

- The Technical Engagement Plan (APP-041) and appendices (APP-042, APP-043, APP-044)
- The Consultation Report (APP-037) and appendices (APP-038, APP-039, APP-040)
- NRW’s Relevant Representation (RR-011)
- The Applicant’s response to NRW’s Relevant Representation at the Procedural Deadline (PDA-008 to PDA-019).

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Table 1.2: Summary of key pre-application consultation with NRW.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
Scoping			
15 June 2022	Scoping Opinion	Statutory	<ul style="list-style-type: none"> Issue of Scoping Opinion (APP-194)
Statutory (Section 42) consultation			
04 June 2023	Statutory consultation	Statutory	<ul style="list-style-type: none"> Statutory consultation responses from NRW are presented in Consultation Report Appendices – Part 3 (D.25-F) (APP-040).
Evidence Plan steering group			
14 December 2021	Meeting	Non-statutory	<ul style="list-style-type: none"> Introduce the cable route selection study To procure high level feedback on the cable routing process To identify any concerns.
20 July 2022	Meeting	Non-statutory	<ul style="list-style-type: none"> Approach to cable route selection Likely Significant Effect (LSE) screening methodology Opportunities to discuss points from the Scoping Opinion.
14 February 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> HRA Stage 1 Screening and Information to Support Appropriate Assessment (ISAA) methodology Consultation on the Preliminary Environmental Information Report (PEIR) and building towards the SoCGs Cable route site selection study updates Engineering considerations towards Special Areas of Conservation (SACs).
29 June 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> HRA Stage 1 Screening and ISAA methodology Section 42 responses Agreement logs.
17 October 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> HRA Stage 1 Screening and ISAA methodology Underwater Sound Management Strategy (UWSMS) Agreement logs.
Evidence Plan benthic ecology, fish and shellfish ecology and physical processes EWG			
01 April 2022	Email	Non-statutory	<ul style="list-style-type: none"> Provision of the benthic survey scope of works.
21 April 2022	Email	Non-statutory	<ul style="list-style-type: none"> Provisions of NRW (A) comments on the benthic survey scope of works
29 November 2022	Meeting	Non-statutory	<ul style="list-style-type: none"> Key project updates Baseline characterisation and modelling approach Initial outputs of impact assessment.

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Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
14 March 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> • Baseline characterisation and initial outputs of impact assessment • Cumulative assessment approach and initial impact assessment approach to agreement.
11 July 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> • Discussion of statutory consultation responses • Updated baselines • Agreement logs.
14 August 2023	Email	Non-statutory	<ul style="list-style-type: none"> • Provision of a technical note presenting the approach to physical processes modelling for the application.
21 August 2023	Email	Non-statutory	<ul style="list-style-type: none"> • Provision of NRW (A)'s comments on the approach to physical processes modelling for the application.
12 October 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> • To present the updates to the benthic ecology baseline characterisation to address statutory consultation responses. Physical processes and fish and shellfish ecology were not discussed.
07 December 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> • Presentation of the final impact assessment, mitigation measures and progress to agreement.

Evidence Plan marine mammal EWG

19 July 2022	Meeting	Non-statutory	<ul style="list-style-type: none"> • Agree the marine mammal study areas • Approach to baseline characterisation • Approach to the Environmental Impact Assessment (EIA), including impact scoping.
17 November 2022	Meeting	Non-statutory	<ul style="list-style-type: none"> • Baseline characterisation • Approach to the underwater sound assessment and population modelling approach.
09 February 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> • Updated baseline characterisation • Underwater sound modelling outputs • Cumulative assessment.
26 June 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> • To present the updated assessment and to discuss statutory consultation responses.
03 August 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> • To present the updated assessment and to discuss statutory consultation responses.
10 October 2023	Email	Non-statutory	<ul style="list-style-type: none"> • Provision of technical note with approach to addressing outstanding items for agreement.
26 October 2023	Email	Non-statutory	<ul style="list-style-type: none"> • Provision of NRW (A)'s comments on approach to addressing outstanding items for agreement
05 December 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> • Final impact assessment • Final mitigation and monitoring requirements • Progress to agreement.

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Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
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Evidence Plan offshore ornithology EWG

27 May 2022	Email	Non-statutory	<ul style="list-style-type: none"> Provision of technical notes outlining the Applicants approach to the offshore ornithology baseline characterisation, displacement and Collision Risk Modelling (CRM) technical reports.
08 June 2022	Email	Non-statutory	<ul style="list-style-type: none"> Provision of NRW (A)'s comments on the baseline characterisation technical note
07 July 2022	Email	Non-statutory	<ul style="list-style-type: none"> Provision of NRW (A)'s comments on the displacement and CRM technical notes
13 July 2022	Meeting	Non-statutory	<ul style="list-style-type: none"> Agree the approach to baseline characterisation, cumulative study area to agree the approach to EIA, including impact scoping Presentation of the interim baseline characterisation and discuss and agree the approach to data analyses, including relevant modelling techniques and parameters.
30 November 2022	Meeting	Non-statutory	<ul style="list-style-type: none"> To agree key receptor species and to present the interim assessment of impacts Relevant regional populations and protected sites/qualifying interests for assessment Approach to HRA Stage 1 screening.
23 February 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> To agree key receptor species and to present the interim assessment of impacts Relevant regional populations and protected sites/qualifying interests for assessment and approach to HRA Stage 1 screening Discuss and agree scope of cumulative impact assessment and transboundary considerations To discuss and agree population assessment approaches and thresholds for LSE and integrity.
05 May 2023	Email	Non-statutory	<ul style="list-style-type: none"> Provision of the updated methodology for offshore ornithology HRA Stage 1 screening and the ISAA.
29 June 2023	Email	Non-statutory	<ul style="list-style-type: none"> Provision of NRW (A)'s comments on the updated methodology for offshore ornithology HRA Stage 1 screening and the ISAA.
30 June 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> Update to baseline characterisation for complete baseline data set Amendments to previously agreed approaches Statutory consultation responses.
10 July 2023	Email	Non-statutory	<ul style="list-style-type: none"> Provision of the technical note presenting the power analysis undertaken at the request of the EWG.
19 July 2023	Email	Non-statutory	<ul style="list-style-type: none"> Provision of NRW (A)'s comments on the power analysis undertaken at the request of the EWG.

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Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
19 October 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> • Presentation of updated baseline characterisation • Impact assessment for the Environmental Statement.
09 November 2023	Email	Non-statutory	<ul style="list-style-type: none"> • Provision of the technical note outlining the Applicant's position regarding using species specific avoidance rates from Ozsanlav-Harris et al. (2023) • Provision of the technical note outlining the final updated methodology for offshore ornithology HRA Stage 1 screening and the ISAA.
24 November 2023	Email	Non-statutory	<ul style="list-style-type: none"> • NRW (A)'s comments on the Applicant's position regarding using species specific avoidance rates and updated methodology for offshore ornithology HRA Stage 1 screening and the ISAA.
29 November 2023	Email	Non-statutory	<ul style="list-style-type: none"> • Provision of the technical note outlining the Applicants position regarding calculating the regional breeding population.
08 December 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> • Presentation of final impact assessment • Comments on draft Environmental Statement • Final mitigation and monitoring requirements.

Table 1.3: Summary of post-application consultation with NRW.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
23 April 2024	Meeting (Marine mammal EWG07)	Non-statutory	<ul style="list-style-type: none"> • Initial feedback on the outline Underwater Sound Management Strategy (APP-202)
05 July 2024	Meeting	Non-statutory	<ul style="list-style-type: none"> • Review of this initial statement of common ground
02 August 2024	Meeting	Non-statutory	<ul style="list-style-type: none"> • Second review of initial statement of common ground prior to submission at Deadline 1

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1.4 Agreement log

1.4.1.1 This section of the SoCG sets out the level of agreement between the parties. For each matter the status is identified as being either agreed, not agreed - material impact, not agreed but no material impact or an ongoing point of discussion, according to the criteria set out in Table 1.4 below.

Table 1.4: Position definitions and colour coding.

Position and colour coding	Definition of position
Agreed	The matter is considered to be agreed between the parties.
Ongoing point of discussion	The matter is neither 'agreed' or 'not agreed' and is a matter where further discussion is required between the parties. For example, where additional clarification is being sought from either party, or where relevant information is being prepared / reviewed.
Not agreed –no material impact	The matter is not considered to be agreed between the parties but is not deemed material. For example, the matter is not agreed however, the outcome of the approach taken by either party does not result in a material impact on the assessment or assessment conclusions in either EIA or HRA terms.
Not agreed – material impact	The matter is not considered to be agreed between the parties. The outcome of the approach taken by either party is considered to result in a materially different outcome on the assessment conclusions.

1.4.1.2 Table 1.5 to Table 1.11 set out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.2). Table 1.5 to Table 1.10 relate to levels of agreement pertaining to the EIA and the DCO. Table 1.11 relates to levels of agreement with respect to the HRA.

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1.4.2 Physical processes (including coastal processes)

Table 1.5: Agreement Log between the parties on physical processes.

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
EIA				
NRW.PP.1	Consultation	The Applicant has undertaken adequate consultation with NRW (A) on potential impacts on physical processes.	Whilst extensive consultation has been undertaken with NRW (A), we continue to request clarification with respect to the location of cable protection in the nearshore zone close to MLWS and if it is the Applicants intention to place cable protection at the exit pits in shallow water. The impact to coastal processes (wave transformation processes, sediment transport and deposition) caused by the presence of cable protection in the shallow water nearshore zone has not been assessed.	Ongoing point of discussion
NRW.PP.2	Consultation	The EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on potential impacts on physical processes.	NRW (A) continue to request clarification with respect to the location of cable protection in the nearshore zone close to MLWS and if it is the Applicants intention to place cable protection at the exit pits in shallow water. The impact to coastal processes (wave transformation processes, sediment transport and deposition) caused by the presence of cable protection in the shallow water nearshore zone has not been assessed.	Ongoing point of discussion
NRW.PP.3	Policy and planning	The Application has identified and considered the plans and policies relevant to physical processes, within NRW (A)'s remit.	NRW (A) agrees that the Applicant has identified and considered the plans and policies relevant to physical processes within NRW (A)'s remit.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.PP.4	Baseline environment	The Applicant has adequately characterised the baseline environment for physical processes.	NRW (A) agrees that the baseline description of physical processes through the desktop review of existing literature and existing data sources, project specific surveys and numerical modelling baseline scenarios are sufficient to appropriately characterise the study area (Array Area as it relates to potential impacts in Welsh waters, Export Cable Corridor).	Agreed
NRW.PP.5	Scoping	Agreement to the scoping of impacts for the EIA for physical processes.	NRW (A) agrees with the impacts scoped into the EIA from a physical processes perspective.	Agreed
NRW.PP.6	Study area	The EIA study area is appropriate for the receptors, sites and impacts assessed.	NRW (A) agrees that the EIA study area is appropriate for the receptors, sites and impacts assessed in relation to physical processes.	Agreed
NRW.PP.7	Project design envelope	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.	NRW (A) continue to request clarification with respect to the location of cable protection in the nearshore zone close to MLWS and if it is the Applicants intention to place cable protection at the exit pits in shallow water. The impact to coastal processes (wave transformation processes, sediment transport and deposition) caused by the presence of cable protection in the shallow water nearshore zone has not been assessed.	Ongoing point of discussion
NRW.PP.8	Assessment methodology	The sensitivity of physical processes receptors has been correctly identified and sufficiently described within the EIA.	NRW (A) agrees that the sensitivity of physical processes receptors have been correctly identified and sufficiently described in EIA.	Agreed
NRW.PP.9	Assessment methodology	The physical processes modelling is appropriate for predicting impacts on physical processes receptors.	NRW (A) agrees with the numerical modelling approach and scenarios conducted in relation to hydrodynamics, waves and sediment transport to inform the potential changes on Constable Bank, Menai Strait and Conwy SAC and the adjacent coast arising from the construction, operation and decommissioning of the Mona Offshore Wind Project.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.PP.10	Assessment methodology	Agreement that the physical processes modelling strategy for the Environmental Statement is appropriate.	NRW (A) agrees – there is no issue with using existing PEIR study as supporting evidence for the Environmental Statement.	Agreed
NRW.PP.11	Assessment methodology	The list of projects screened into the Cumulative Effects Assessment (CEA) in the EIA is appropriate.	NRW (A) agrees that the list of projects screened into the CEA in the EIA is appropriate.	Agreed
NRW.PP.12	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on physical processes in EIA terms for the Mona Offshore Wind Project alone.	NRW (A) continue to request clarification with respect to the location of cable protection in the nearshore zone close to MLWS and if it is the Applicants intention to place cable protection at the exit pits in shallow water. The impact to coastal processes (wave transformation processes, sediment transport and deposition) caused by the presence of cable protection in the shallow water nearshore zone has not been assessed.	Ongoing point of discussion
NRW.PP.13	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant effects on physical processes in EIA terms for the Mona Offshore Wind Project cumulatively with other plans and projects.	NRW (A) agrees that there will be no significant effects on physical processes in EIA terms for the Mona Offshore Wind Project cumulatively with other plans and projects.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.PP.14	Mitigation and monitoring	The mitigation measures and conditions outlined in Volume 2, Chapter 1: Physical processes (APP-053) and the Mitigation and Monitoring schedule (APP-196) are appropriate and will ensure significant effects are avoided.	<p>Subject to the resolution of matters relating to the assessment of cable protection at the nearshore zone (e.g. NRW.PP.1) and to the commitment that no cable protection will be placed on Constable Bank, that no cable protection higher than 70 cm will be installed within Menai Strait and Conwy Bank SAC and that cable protection will be up to 10 m wide, kept low profile, and will be no more than 5% reduction water depth, then NRW (A) agrees that the mitigation and monitoring outlined in Volume 2, Chapter 1: Physical processes (APP-053) and the Mitigation and Monitoring schedule (APP-196) are suitable for the purposes of the DCO.</p> <p>NRW (A) marine will need to be consulted on the relevant plans (Offshore Construction Method Statement (OCMS) and Landfall Construction Method Statement (LCMS)) – see PDA-005</p>	Ongoing point of discussion
Draft DCO				
NRW.PP.15	Monitoring requirements/ conditions	The mitigation and monitoring outlined in Volume 2, Chapter 1: Physical processes (APP-053) and the Mitigation and Monitoring schedule (APP-196) are suitable for the purposes of the DCO application.	<p>Subject to the resolution of matters relating to the assessment of cable protection at the nearshore zone (e.g. NRW.PP.1) and to the commitment that no cable protection will be placed on Constable Bank, that no cable protection higher than 70 cm will be installed within Menai Strait and Conwy Bank SAC and that cable protection will be up to 10 m wide, kept low profile, and will be no more than 5% reduction water depth, then NRW (A) agrees that the mitigation and monitoring outlined in Volume 2, Chapter 1: Physical processes (APP-053) and the Mitigation and Monitoring schedule (APP-196) are suitable for the purposes of the DCO.</p> <p>NRW (A) marine will need to be consulted on the relevant plans (OCMS and LCMS) – see PDA-005</p>	Ongoing point of discussion

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1.4.3 Benthic subtidal and intertidal ecology (including coastal habitats)

Table 1.6: Agreement Log between the parties on benthic subtidal and intertidal ecology.

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
EIA				
NRW.BE.1	Consultation	The Applicant has undertaken adequate consultation with NRW (A) on potential impacts on benthic subtidal and intertidal ecology.	Whilst extensive consultation has been undertaken with NRW (A), we continue to request clarification with respect to the location of cable protection in the nearshore zone close to MLWS and if it is the Applicants intention to place cable protection at the exit pits in shallow water. The impact to benthic ecology caused by the presence of cable protection in the shallow water nearshore zone has not been assessed.	Ongoing point of discussion
NRW.BE.2	Consultation	The EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on potential impacts on benthic subtidal and intertidal ecology.	NRW (A) continue to request clarification with respect to the location of cable protection in the nearshore zone close to MLWS and if it is the Applicants intention to place cable protection at the exit pits in shallow water. The impact to benthic ecology caused by the presence of cable protection in the shallow water nearshore zone has not been assessed.	Ongoing point of discussion
NRW.BE.3	Policy and planning	The Application has identified and considered the plans and policies relevant to benthic subtidal and intertidal ecology, within NRW (A)'s remit.	NRW (A) agrees that the Applicant has identified and considered the plans and policies relevant to benthic ecology within NRW (A)'s remit.	Agreed
NRW.BE.4	Surveys	A broad approach to benthic ecology site-specific surveys has been adopted.	NRW (A) agrees on the broad approach to characterisation for Benthic Ecology in particular now that the Zone of Influence has been sampled.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.BE.5	Baseline environment	Sufficient site-specific and desktop data has been collated to appropriately characterise the baseline benthic subtidal and intertidal ecology environment to inform the EIA.	NRW (A) agrees sufficient site-specific and desktop data has been collated to inform the EIA. NRW (A) agrees that the data collected through the site-specific surveys and through the desktop review of existing literature and data sources is sufficient to appropriately characterise the benthic ecology in the export cable corridor.	Agreed
NRW.BE.6	Baseline environment	Agreement on the baseline characterisation for benthic subtidal and intertidal ecology.	NRW (A) agrees on the broad approach to characterisation for Benthic Ecology in particular now that the Zone of Influence has been sampled. NRW (A) agrees with the identification of benthic subtidal and intertidal ecology Important Ecological Features (IEFs).	Agreed
NRW.BE.7	Scoping	Agreement to the scoping of impacts for the EIA for benthic subtidal and intertidal ecology.	NRW (A) agrees with the scoping of impacts for the EIA and HRA for Benthic Subtidal and Intertidal Ecology.	Agreed
NRW.BE.8	Study area	The EIA study area is appropriate for the receptors and impacts assessed.	NRW (A) agrees with the regional benthic subtidal and intertidal area defined in the PEIR.	Agreed
NRW.BE.9	Project design envelope	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.	NRW (A) continue to request clarification with respect to the location of cable protection in the nearshore zone close to MLWS and if it is the Applicants intention to place cable protection at the exit pits in shallow water. The impact to benthic ecology caused by the presence of cable protection in the shallow water nearshore zone has not been assessed.	Ongoing point of discussion
NRW.BE.10	Assessment methodology	The sensitivity of benthic subtidal and intertidal ecology receptors has been correctly identified and sufficiently described within the EIA.	NRW (A) agrees that the sensitivity of benthic subtidal and intertidal ecology receptors has been correctly identified and sufficiently described within the EIA.	Agreed
NRW.BE.11	Assessment methodology	The list of projects screened into the CEA in the EIA is appropriate.	NRW (A) agrees that the list of projects screened into the CEA in the EIA is appropriate.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.BE.12	Assessment of the effects from the Mona Offshore Wind Project alone	On the basis that there is no direct overlap with features of Marine Conservation Zones (MCZs), there will be no risk of hindering conservation objectives of any MCZs with benthic subtidal features.	NRW (A) agrees that as there is no direct overlap with features of MCZs, there will be no risk of hindering conservation objectives of any MCZs with benthic subtidal features.	Agreed
NRW.BE.13	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on benthic subtidal and intertidal ecology in EIA terms for the Mona Offshore Wind Project alone.	NRW (A) continue to request clarification with respect to the location of cable protection in the nearshore zone close to MLWS and if it is the Applicants intention to place cable protection at the exit pits in shallow water. The impact to benthic ecology caused by the presence of cable protection in the shallow water nearshore zone has not been assessed.	Ongoing point of discussion
NRW.BE.14	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant effects on benthic subtidal and intertidal ecology in EIA terms for the Mona Offshore Wind Project cumulatively with other plans and projects.	NRW (A) agrees that there will be no significant effects on benthic ecology in EIA terms for the Mona OWF Project cumulatively with other plans and projects.	Agreed
NRW.BE.15	Mitigation and monitoring	The mitigation measures and conditions outlined in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) and the Mitigation and Monitoring schedule (APP-196) are appropriate and will ensure significant effects are avoided.	Subject to the resolution of matters relating to the assessment of cable protection at the nearshore zone (e.g. NRW.BE.1) and to the commitment that no cable protection will be placed on Constable Bank, that no cable protection higher than 70 cm will be installed within Menai Strait and Conwy Bank SAC and that cable protection will be up to 10 m wide, kept low profile, and will be no more than 5% reduction water depth, then NRW (A) agrees that the mitigation measures and conditions outlined in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) and the Mitigation and Monitoring schedule (APP-196) are appropriate and will ensure significant effects are avoided. NRW (A) marine will need to be consulted on the relevant plans (OCMS and LCMS) – see PDA-005	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
Draft DCO				
NRW.BE.16	Monitoring requirements/ conditions	The mitigation and monitoring outlined in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) and the Mitigation and Monitoring schedule (APP-196) are suitable for the purposes of the DCO application.	<p>Subject to the resolution of matters relating to the assessment of cable protection at the nearshore zone (e.g. NRW.BE.1) and to the commitment that no cable protection will be placed on Constable Bank, that no cable protection higher than 70 cm will be installed within Menai Strait and Conwy Bank SAC and that cable protection will be up to 10 m wide, kept low profile, and will be no more than 5% reduction water depth, then NRW (A) agrees that the mitigation and monitoring outlined in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) and the Mitigation and Monitoring schedule (APP-196) are suitable for the purposes of the DCO application.</p> <p>NRW (A) marine will need to be consulted on the relevant plans (OCMS and LCMS) – see PDA-005NRW.</p>	Ongoing point of discussion

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1.4.4 Water framework directive - coastal and transitional waters
Table 1.7: Agreement Log between the parties on Water Framework Directive - coastal and transitional waters.

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
Water Framework Directive Coastal Waters Assessment				
NRW.WFDC.1	Policy and planning	The Water Framework Directive (WFD) Regulations Coastal and Transitional Waters assessment (APP-088) has identified all appropriate legislation, policy and guidance relevant to the WFD Regulations.	With the exception of concerns below, NRW (A) agrees that the assessment with respect to water quality is compliant with the requirements of the WFD.	Ongoing point of discussion
NRW.WFDC.2	Assessment methodology	The methodology applied to undertake the WFD Coastal and Transitional Waters assessment is appropriate.	NRW (A) continue to advise that for the purposes of chemical contaminant, assessment should extend to 12 nm from MHWS for compliance with the WFD Regulations.	Ongoing point of discussion
NRW.WFDC.3	Assessment methodology	The WFD Coastal and transitional Waters assessment has identified the appropriate water bodies.	NRW (A) agrees that the WFD Coastal and Transitional waters assessment has identified the appropriate water bodies.	Agreed
NRW.WFDC.4	Assessment methodology	The WFD Coastal and transitional Waters assessment has accurately scoped the elements of each identified water body.	NRW (A) agrees that the assessment has accurately scoped the elements of each identified water body.	Agreed
NRW.WFDC.5	Outcome of the WFD coastal and transitional waters assessment	There will be no significant effects on the identified water bodies and the ability of these water bodies to achieve good status in the future. The construction, operations and maintenance and decommissioning of the Mona Offshore Wind Project export cables is therefore considered to comply with the requirements of the WFD.	NRW (A) supports the assessment conclusion in Volume 6, Annex 2.2: Water Framework Directive Coastal Waters Assessment (APP-088) that the proposed works will not cause deterioration to the water quality of either of the water bodies considered (North Wales coastal waterbody and Clwyd transitional waterbody), nor the individual elements of these water bodies, or impact the objectives of achieving Good Ecological Potential (GEP) and Good Ecological Status (GES).	Agreed

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1.4.5 Fish and shellfish ecology

Table 1.8: Agreement Log between the parties on fish and shellfish ecology.

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
EIA				
NRW.FSF.1	Consultation	The Applicant has undertaken adequate consultation with NRW (A) on potential impacts on fish and shellfish ecology.	NRW (A) agrees that adequate consultation has been made by the applicant.	Agree
NRW.FSF.2	Consultation	The EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on potential impacts on fish and shellfish ecology.	As there remains points outstanding in relation to potential impacts to cod, NRW (A) cannot currently agree.	Ongoing point of discussion
NRW.FSF.3	Policy and planning	The Application has identified and considered the plans and policies relevant to fish and shellfish ecology, within NRW (A)'s remit.	NRW (A) agrees that relevant plans and policies have been considered and identified.	Agree
NRW.FSF.4	Baseline environment	Agreement on the baseline characterisation for fish and shellfish ecology.	NRW (A) agrees that the data collected through the site-specific surveys and through the desktop review of existing literature and data sources are sufficient to appropriately characterise the fish ecology for the Mona Offshore Wind Project. Source: NRW (A)'s Relevant Representation (RR-011)	Agreed
NRW.FSF.5	Scoping	Agreement to the scoping of impacts for the EIA for fish and shellfish ecology.	NRW (A) agree with the scoping of impacts for the EIA for Fish and Shellfish Ecology.	Agreed
NRW.FSF.6	Study area	The EIA study area is appropriate for the receptors and impacts assessed.	NRW (A) agrees that the EIA study area is appropriate for the receptors and impacts assessed.	Agreed
NRW.FSF.7	Project design envelope	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.	NRW (A) agrees that the design envelope has been adequately assessed.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.FSF.8	Assessment methodology	The sensitivity of fish and shellfish ecology receptors has been correctly identified and sufficiently described within the EIA.	NRW (A) does not currently agree, as points remain outstanding with regards to the assessment of cod.	Ongoing point of discussion
NRW.FSF.9	Assessment methodology	Agreement on approach to the underwater sound modelling and approach to assessment of underwater sound impacts.	NRW (A) consider that points remain outstanding in relation to the overall noise modelling and approach including for cod and herring.	Ongoing point of discussion
NRW.FSF.10	Assessment methodology	Cod and herring should be considered to have high sensitivity to underwater sound.	NRW (A) agrees with the Marine Management Organisation (MMO) that cod should be considered as having high sensitivity to sound. NRW (A) agrees that herring have a high sensitivity to sound.	Agreed
NRW.FSF.11	Assessment methodology	The characterisation of sandeel spawning potential is sufficient to inform the EIA.	NRW (A) consider the characterisation of sandeel potential sufficient to inform the EIA.	Agreed
NRW.FSF.12	Assessment methodology	The characterisation of herring spawning potential is sufficient to inform the EIA.	NRW (A) consider the characterisation of herring spawning potential sufficient to inform the EIA.	Agreed
NRW.FSF.13	Assessment methodology	The list of projects screened into the CEA in the EIA is appropriate.	NRW (A) agrees the list of projects is appropriate.	Agreed
NRW.FSF.14	Assessment of the effects from the Mona Offshore Wind Project alone	On the basis that there is no direct overlap with fish features of MCZs of sound contours with the potential to cause injury or behavioural responses, there will be no risk of hindering conservation objectives of any MCZs with fish features.	NRW (A) agrees there is no direct overlap with fish features of MCZs of sound contours as the only Welsh MCZ is Skomer, which does not include any fish features.	Agreed
NRW.FSF.15	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on fish and shellfish receptors in EIA terms for the Mona Offshore Wind Project alone with the exception of piling impacts, for which a moderate impact on herring was assessed and a minor impact on cod, during the construction phase Volume 2, Chapter 3: Fish and shellfish ecology (APP-055).	Whilst we agree that for all impacts, other than underwater sound, no significant effects on fish and shellfish receptors are predicted for the project alone, NRW (A) considers that the underwater noise assessment relating to cod remains unresolved and as such we do not currently agree with this statement.	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.FSF.16	Assessment of the effects from the Mona Offshore Wind Project alone	The potential impacts on cod high intensity spawning habitat have been assessed in relation to the underwater sound impacts arising from construction activities, with these specifically discussed in section 3.9.3 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). In terms of area impacted, these do result in up to 21.64% of the high intensity cod spawning grounds within the study area being impacted by underwater sound. However, the total area is not the only factor taken into account when assessing the significance of the overall impact on cod.	NRW (A) does not agree that, for the Mona Offshore Wind Project 'alone', impacting 21.64% of the cod high intensity spawning habitat as a result of disturbance from underwater noise can be assessed as minor. We advise that, by adopting the approaches applied for herring, that the impact should be assessed as moderately adverse during the breeding season.	Ongoing point of discussion
NRW.FSF.17	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant effects on fish and shellfish receptors in EIA terms for the Mona Offshore Wind Project cumulatively with other plans and projects, with the exception of piling impacts.	Notwithstanding NRW.FSF.15, NRW.FSF.16 and NRW.FSF.18, NRW (A) agrees with the assessment of the effects from the Mona Offshore Wind project cumulatively with other plans and projects.	Agreed
NRW.FSF.18	Assessment of the effects - from the Mona Offshore Wind Project alone and cumulatively with other projects	For piling impacts, no significant effects are predicted on fish and shellfish receptors, other than cod and herring during the spawning period.	With the exception of cod and herring which remains an ongoing area of discussion, NRW (A) agrees with the piling effects predicted on fish and shellfish receptors.	Agreed
NRW.FSF.19	Mitigation and monitoring	The mitigation measures and conditions outlined in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055) and the Mitigation and Monitoring schedule (APP-196) are appropriate and will ensure significant effects are avoided (with the exception of underwater sound).	Whilst NRW (A) agrees that the UWSMS is a good framework to support proposed mitigation and monitoring approaches, we consider that further detail is required to make the strategy robust.	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.FSF.20	Mitigation and monitoring	The Underwater Sound Management Strategy (APP-202) is appropriate and will ensure significant effects from underwater sound are avoided.	As noted in our Relevant Representation (RR-011), we agree, in principle, with the commitment to develop an UWSMS and that it contains a wide range of potential mitigation measures that could be appropriate to reduce the impact on fish. However, we note that there is currently a lack of detail and committed measures. We welcome the commitment of the Applicant to continue to engage with NRW (A) to develop the USWMS during examination and post-consent, and as part of our written representations have provided a number of observations and recommendations on the draft outline UWSMS as provided with the application (APP-202)	Ongoing point of discussion
Draft DCO				
NRW.FSF.21	Monitoring requirements/ conditions	The mitigation and monitoring outlined in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055) and the Mitigation and Monitoring schedule (APP-196) are suitable for the purposes of the DCO application.	Before being able to agree with this position, we consider the outstanding points remaining for cod and the UWSMS require further discussion. Please also see NRW.FSF.20 above	Ongoing point of discussion

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1.4.6 Marine mammals
Table 1.9: Agreement Log between the parties on marine mammals.

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
EIA				
NRW.MM.1	Consultation	The Applicant has undertaken adequate consultation with NRW (A) on potential impacts on marine mammals.	NRW (A) agrees that the applicant has undertaken adequate consultation with NRW(A) on potential impacts on marine mammals.	Agreed
NRW.MM.2	Consultation	The EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on potential impacts on marine mammals.	NRW (A) agrees that the EIA has had due regard to matters raised by NRW (A)	Agreed
NRW.MM.3	Policy and planning	The Application has identified and considered the plans and policies relevant to marine mammals, within NRW (A)'s remit.	NRW (A) agrees that the Application has identified and considered the plans and policies relevant to marine mammals within our remit.	Agreed
NRW.MM.4	Surveys	Agreement on aerial surveys with respect to marine mammals, in particular the use of an appropriate buffer around the Mona Array Area.	NRW (A) agrees with the data collected through surveys and literature including the data sources used to characterise the baseline, as well as the management unit approach adopted (APP-056).	Agreed
NRW.MM.5	Baseline environment	Agreement on the baseline characterisation for marine mammals.	NRW (A) agrees with the data collected through surveys and literature including the data sources used to characterise the baseline, as well as the management unit approach adopted (APP-056).	Agreed
NRW.MM.6	Scoping	Agreement to the scoping of impacts for the EIA for marine mammals.	NRW (A) agrees with the scoping of impacts for the EIA for marine mammals.	Agreed
NRW.MM.7	Study area	The EIA study area is appropriate for the receptors and impacts assessed.	NRW (A) agrees with the data collected through surveys and literature including the data sources used to characterise the baseline, as well as the management unit approach adopted (APP-056). Source: NRW's Relevant Representation (RR-011).	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.MM.8	Project design envelope	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.	NRW (A) agrees that the maximum design scenario has been identified, described, and assessed for the EIA.	Agreed
NRW.MM.9	Assessment methodology	The sensitivity of marine mammal receptors has been correctly identified and sufficiently described within the EIA.	NRW (A) agrees that the sensitivity of marine mammal receptors has been correctly identified and sufficiently described within the EIA and the supplementary information provided as part of the Applicants response to our relevant representations.	Agreed
NRW.MM.10	Assessment methodology	Agreement on approach to underwater sound modelling and approach to assessment of underwater sound impacts.	NRW (A) broadly agrees with the approach to underwater sound modelling and assessment of impacts with the exception of the points raised in NRW's Relevant Representations, and Written Representations.	Ongoing point of discussion
NRW.MM.11	Assessment methodology	Agreement on scoping of species to be included within the assessments.	NRW (A) agrees with the species scoped into the assessments.	Agreed
NRW.MM.12	Assessment methodology	Agreement on approach to densities and reference populations.	NRW (A) agrees with the approach to densities and reference populations.	Agreed
NRW.MM.13	Assessment methodology	The list of projects screened into the CEA in the EIA is appropriate.	NRW (A) agrees with the list of projects screened into the CEA in the EIA.	Agreed
NRW.MM.14	Assessment of the effects from the Mona Offshore Wind Project alone	Other than unexploded ordnance (UXO) impacts, there will be no significant effects on marine mammal receptors in EIA terms for the Mona Offshore Wind Project alone.	NRW (A) agrees with the overall conclusions presented in the EIA, notwithstanding any issues raised through our written representations.	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.MM.15	Assessment of the effects from the Mona Offshore Wind Project alone	It is unrealistic to assess injury and disturbance from vessel use by presenting a sum of the impact ranges of all vessels within each offshore windfarm (as agreed with NRW through their S42 response). The Applicant included further evidence and a more detailed approach in the assessment of elevated underwater sound from vessels in the final Environmental Statement to justify the conclusion of low magnitude.	<p>We note the Applicant's response (PDA-009) submitted at the Procedural Deadline, however, we continue to advise that there is inadequate justification for a conclusion of low magnitude, due to the estimated numbers of animals disturbed by vessels having been based on static impact radii. Given that vessels would be expected to move location, we consider that estimating numbers in this way may lead to both underestimates of daily numbers disturbed, and an underestimate of the overall daily area ensonified; which is required to compare against the time area thresholds for an adverse effect for harbour porpoise SACs.</p> <p>We have provided further detail regarding the approach we would recommend in our written representations.</p>	Ongoing point of discussion
NRW.MM.16	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	Other than piling and UXO impacts, there will be no significant effects on marine mammal receptors in EIA terms for the Mona Offshore Wind Project cumulatively.	NRW (A) agrees with the overall conclusions presented in the cumulative assessment of the EIA.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.MM.17	Assessment of the effects from the Mona Offshore Wind Project alone	For UXO impacts, although a significant effect (injury) on harbour porpoise is predicted any such effects will be managed and avoided through measures set out in the outline Marine mammal mitigation protocol (APP-207) and outline Underwater Sound Management Strategy (APP-202), which will be agreed with stakeholders post consent.	<p>NRW (A) would in principle expect to agree that impacts to harbour porpoise will be managed and avoided through measures set-up post consent, following discussion with stakeholders.</p> <p>As noted in our Relevant Representation (RR-011), we agree, in principle, with the commitment to develop an UWSMS and that it should identify all potential noise sources associated with the project with further detail provided in associated mitigation plans. Whilst we acknowledge that further significant detail cannot be populated at this time, we consider it likely that the UWSMS could potentially reduce the magnitude of impacts to an acceptable level. We welcome the commitment of the Applicant to continue to engage with NRW (A) to develop the USWMS during examination and post-consent, and as part of our written representations have provided a number of observations and recommendations on the draft outline UWSMS as provided with the application (APP-202).</p>	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.MM.18	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	For piling impacts, although a significant cumulative effect (in EIA terms) is predicted on bottlenose dolphin, any such effects will be managed and avoided through measures set out in the Outline Marine Mammal Mitigation Protocol (APP-207) and outline Underwater Sound Management Strategy (APP-202), which will be agreed with stakeholders post consent.	NRW (A) would in principle expect to agree that impacts to bottlenose dolphin will be managed and avoided through measures set-up post consent, following discussion with stakeholders. As noted in our Relevant Representation (RR-011), we agree, in principle, with the commitment to develop an UWSMS and that it should identify all potential noise sources associated with the project with further detail provided in associated mitigation plans. Whilst we acknowledge that further significant detail cannot be populated at this time, we consider it likely that the UWSMS could potentially reduce the magnitude of impacts to an acceptable level. We welcome the commitment of the Applicant to continue to engage with NRW (A) to develop the USWMS during examination and post-consent, and as part of our written representations have provided a number of observations and recommendations on the draft outline UWSMS as provided with the application (APP-202).	Ongoing point of discussion
NRW.MM.19	Mitigation and monitoring	The mitigation measures and conditions outlined in Volume 2, Chapter 4: Marine mammals (APP-056) and the Mitigation and Monitoring schedule (APP-196) are appropriate and will ensure significant effects are avoided.	NRW (A) would in principle agree that the mitigation measures and conditions outlined in APP-056 and APP-196 are appropriate, noting our current comments on the draft outline UWSMS.	Ongoing point of discussion
Other Documents and Plans				
NRW.MM.20	Monitoring requirements/ conditions	The mitigation and monitoring outlined in Volume 2, Chapter 4: Marine mammals (APP-056) and the Mitigation and Monitoring schedule (APP-196) are suitable for the purposes of the DCO application.	NRW (A) agrees that the measures outlined in these documents are suitable for the purposes of the DCO application, but please note NRW.MM.19 above.	Agreed

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1.4.7 Offshore ornithology
Table 1.10: Agreement Log between the parties on offshore ornithology.

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
EIA				
NRW.OO.1	Consultation	The Applicant has undertaken adequate consultation with NRW (A) on potential impacts on offshore ornithology.	Good progress was made through the EWG during the pre-application process, with broad agreement on most areas. However, some approaches to assessments presented in the application differed to those agreed through the EWG process or had not been discussed with the EWG before the submission (see comments in our Relevant and Written Representations).	Ongoing point of discussion
NRW.OO.2	Consultation	The EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on potential impacts on offshore ornithology.	See comments on NRW.OO.1 above	Ongoing point of discussion
NRW.OO.3	Policy and planning	The Application has identified and considered the plans and policies relevant to offshore ornithology, within NRW (A)'s remit.	NRW (A) agrees that the Application has identified and considered the plans and policies relevant to offshore ornithology	Agreed
NRW.OO.4	Surveys	Agreement on broad approach to site specific digital aerial surveys.	NRW (A) agrees with the broad approach to aerial surveys. NRW (A) welcomes the power analysis work that has been undertaken for Mona of using baseline survey data to ensure an appropriate level of survey coverage and data analysis has been achieved. NRW (A) considers the approach taken to be adequate, essentially comparing theoretical baseline and impacted areas to determine how many birds would need to be sampled to achieve suitable power to detect desired effect sizes. The work undertaken does provide some confidence that the surveys conducted are fit for purpose in terms of baseline characterisation for consideration in EIA and HRA.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.OO.5	Scoping	Agreement to the scoping of impacts for the EIA for offshore ornithology.	NRW agrees with the scoping of impacts for the EIA for offshore ornithology	Agreed
NRW.OO.6	Baseline environment	Agreement on the baseline characterisation for the Mona Offshore Cable Corridor including the intertidal area using desktop data sources and digital aerial survey.	NRW (A) agrees with the approach to characterisation for the export cable corridor, including that relevant to the intertidal area of cable landfall.	Agreed
NRW.OO.7	Baseline environment	Agreement on the baseline characterisation for offshore ornithology.	Power analysis report has been reviewed by NRW (A) and the work undertaken does provide NRW (A) with some confidence that the digital aerial surveys conducted are fit for purpose in terms of baseline characterisation for consideration in EIA and HRA.	Agreed
NRW.OO.8	Study area	The EIA study area is appropriate for the receptors and impacts assessed.	The approach to the study area as described in Volume 2, Chapter 5: Offshore ornithology (APP-057) (5.3.4 Study areas) is agreed. However, see comment NRW.OO.16 regarding the approach to estimating regional breeding populations.	Ongoing point of discussion
NRW.OO.9	Project design envelope	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.	NRW (A) agree that Volume 2, Chapter 5: Offshore ornithology (APP-057) Table 5.21 sets out the Maximum Design Scenario and that this scenario is assessed.	Agreed
NRW.OO.10	Assessment methodology	The sensitivity of offshore ornithology receptors has been correctly identified and sufficiently described within the EIA.	NRW (A) agree that the sensitivity of offshore ornithology receptors has been correctly identified and sufficiently described in Volume 2, Chapter 5: Offshore ornithology (APP-057) Table 5.12.	Agreed
NRW.OO.11	Assessment methodology	Agreement on the approach to displacement assessment methodology.	As a range of % displacement and % mortality rates have been considered and assessed with Volume 2, Chapter 5: Offshore ornithology (APP-057), as advised by NRW (A), NRW (A) agree with the approach to displacement assessment methodology.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.OO.12	Assessment methodology	Agreement on the approach to collision risk assessment methodology.	NRW (A) agrees with the approach of using the stochastic Collision Risk Model (sCRM) and largely agree with the input parameters used. However, it should be noted that NRW (A) advise the use of the species-group avoidance rates rather than the species-specific avoidance rates (as was advised during the EWG). We note that in Section 5.7.5 of Volume 2, Chapter 5: Offshore ornithology (APP-057) the Applicant has presented potential impacts from the project alone for using both the species-specific and species-group avoidance rates. Therefore, NRW (A) are content with this approach. However, we note that we will base our advice on the predicted impacts using the Statutory Nature Conservation Body (SNCB) advised species-group avoidance rates.	Ongoing point of discussion
NRW.OO.13	Assessment methodology	Agreement on the approach to migratory bird collision risk assessment methodology	NRW (A) confirms agreement to the approach set out by the Applicant in EWG05 during that meeting as set out in EWG05 meeting minutes.	Agreed
NRW.OO.14	Assessment methodology	Agreement on the approach to apportioning assessment methodology.	NRW (A) disagrees with several aspects of the apportioning methods used in both the breeding and non-breeding seasons. For example: the approach to age class apportionment for kittiwake in the breeding season, approach to age class apportionment in the non-breeding season and a lack of information or explanation on the treatment of immature birds in the non-breeding season. See NRW Relevant Representations (RR-011) and Written Representations for full details.	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.OO.15	Assessment methodology	Agreement on the approach to Population Viability Analysis (PVA) and that PVAs have been undertaken where appropriate.	<p>At present several errors/inconsistencies in the submission have been identified, which were highlighted in our Relevant Representations (RR-011). PDA-008 (produced by the Applicant) notes that the errors will be corrected in an Errata document submitted into Deadline 1. Once these errors are corrected and the most appropriate figures are used in impacts, as was agreed during EWG Mtg 07, where baseline mortality exceeds 1% from either the Applicant's or SNCB preferred parameterisation of CRM, this would be taken through to PVA. This also applies to displacement.</p> <p>This also applies for impacts to the features of the Pen y Gogarth/Great Orme's Head Site of Special Scientific Interest (SSSI) once fully quantified apportioned impacts have been undertaken by the Applicant.</p> <p>NRW (A) will be able to advise further once the errata document has been submitted by the Applicant and reviewed by NRW (A).</p>	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.OO.16	Assessment methodology	The approach to estimating regional breeding populations is accurate and robust.	NRW (A) (and other SNCB, Natural England/Joint Nature Conservation Committee (JNCC)) advice has been to define the breeding season regional population on the Biologically Defined Minimum Population Scales (BDMPS) for both the project alone and cumulative assessments. However, the Applicant's approach in the submission has been to define the reference population by foraging range for the project alone assessment and to follow the NRW (A) (and other SNCB) advised approach for cumulative assessments. This approach was discussed during EWG07, and the Applicant and NRW (A) agreed to disagree on this matter. However, we note that with the exception of gannet and Manx shearwater, the Applicant's approach results in more precautionary breeding season reference populations. We note that in Volume 2, Chapter 5: Offshore ornithology (APP-057) for gannet and Manx shearwater, the Applicant has assessed impacts from the Mona Offshore Wind Project alone against both the SNCB advised more precautionary regional breeding season populations and the Applicants calculated populations.	Ongoing point of discussion.
NRW.OO.17	Assessment methodology	The list of projects screened into the CEA in the EIA is appropriate.	NRW (A) agrees with the projects screened into the EIA cumulative assessment. However, as noted below on points NRW.OO.19-20, we have concerns regarding the lack of data for the projects screened into the CEA and that the assessments cannot be considered comprehensive (see our Relevant Representations (RR-011) for details.	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.OO.18	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on offshore ornithology receptors in EIA terms for the Mona Offshore Wind Project alone	<p>NRW (A) cannot currently agree with this. However, as noted in our Relevant Representations (RR-011), whilst NRW (A) considers it likely that the EIA scale impacts from the Mona Offshore Wind Project alone are predicted to be small and hence not “significant” for the purposes of EIA, there are several areas of uncertainty, inconsistency and possible errors in the assessments presented that should be checked and corrected, where appropriate, before we can confirm agreement on a number of the conclusions.</p> <p>We await the results of revised assessments to be presented during the Examination process, but also recommend that application documents (i.e. the ES, HRA and associated documents) are updated to avoid future projects not being able to readily identify the final impact totals for their cumulative and in-combination assessments.</p>	Ongoing point of discussion
NRW.OO.19	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant effects on ornithology receptors in EIA terms for the Mona Offshore Wind Project cumulatively with other plans and projects.	<p>NRW (A) cannot currently agree or make comment on the level of significance of cumulative effects for reasons set out in our comments to points NRW.OO.18 above and NRW.OO.20 below. Additionally, as noted in our Relevant Representations (RR-011) there are several errors in the figures the Applicant has included for other projects (e.g. Erebus), which need to be corrected, together with the other issues already noted, and assessments updated before we can make any conclusions/provide any advice on significance of cumulative effects.</p>	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.OO.20	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	Agreement on approach to cumulative assessment for projects where impact quantification is unavailable.	NRW (A) does not agree. Advice was given during the EWG process, including a paper by Natural England (which NRW agreed with) on a methodology for 'gap filling' impacts from previous projects, which was not followed. A meeting between the Applicant and the relevant agencies has been proposed to discuss this matter further. Further detail on this can be found in our Written Representations.	Ongoing point of discussion
NRW.OO.21	Mitigation and monitoring	Trenchless techniques at the Mona landfall will not be included in this restriction but vessel movements will be managed to minimise effects on features of Liverpool Bay Special Protection Area (SPA) via the Measures to Minimise Impacts to Marine Mammals and Rafting Birds (APP-203).	We acknowledge the Applicant's position set out in their response to RR-011.24 of PDA-008 that prohibiting works at the trenchless techniques exit pits during the overwintering period would add further pressure to the installation window for offshore export cables. However, any disturbance impact to features of the SPA will be temporary for the time of the vessel presence; birds will be able to return once the vessel has gone; there will be other habitat available within the SPA to the birds for the time they are disturbed from the landfall area; up to eight movements across the key winter period of Nov-Mar represents a small proportion over this timescale; and a commitment to Horizontal Directional Drilling (HDD) for landfall has been made, NRW (A) do not expect this temporary activity to result in an Adverse Effect on Site Integrity (AEoSI). These commitments should be appropriately secured within the conditions of the licence. See our Written Representations for further details.	Ongoing point of discussion
NRW.OO.22	Mitigation and monitoring	The mitigation measures and conditions outlined in Volume 2, Chapter 5: Offshore ornithology (APP-057), the Mitigation and Monitoring schedule (APP-196) and the Marine Licence Principles document (APP-195) are appropriate and will ensure significant effects are avoided.	See comments to points NRW.HRA.36 below and NRW.OO.21 above	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
Draft DCO				
NRW.OO.23	Monitoring requirements/ conditions	The mitigation and monitoring outlined in Volume 2, Chapter 5: Offshore ornithology (APP-057) and the Mitigation and Monitoring schedule (APP-196) are suitable for the purposes of the DCO application.	See comments to points NRW.HRA.36 below and NRW.OO.21 above	Ongoing point of discussion

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1.4.8 Habitats Regulations Assessment

Table 1.11: Agreement Log between the parties on Habitats Regulations Assessment

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
Physical processes				
NRW.HRA.1	Screening	Agreement to the screening of impacts for the HRA for physical processes	NRW (A) agrees with the impacts screened into the HRA from a physical processes perspective.	Agreed
NRW.HRA.2	Assessment methodology	All European sites with physical processes features that have the potential for LSE have been identified within the HRA Stage 1 screening and considered in the Stage 2 ISAA.	NRW (A) agrees that all European sites with physical processes features that have the potential for LSE have been identified within the HRA Stage 1 screening and considered in the Stage 2 ISAA.	Agreed
NRW.HRA.3	Assessment methodology	The list of projects screened into the in-combination assessment in the HRA is appropriate.	NRW (A) agrees	Agreed
NRW.HRA.4	Study area	The HRA study area is appropriate for the receptors, sites and impacts assessed.	NRW (A) agrees	Agreed
NRW.HRA.5	Outcomes of the ISAA (Mona Offshore Wind Project alone)	There will be no adverse effects on the integrity of SACs with physical processes features for the Mona Offshore Wind Project alone.	NRW (A) agrees	Agreed
NRW.HRA.6	Outcomes of the ISAA (in-combination with other plans and projects)	There will be no adverse effects on the integrity of SACs with physical processes features for the Mona Offshore Wind Project in-combination with other plans and projects.	NRW (A) agrees	Agreed
Benthic subtidal and intertidal ecology				
NRW.HRA.7	Screening	Agreement to the screening of impacts for the HRA for benthic subtidal and intertidal ecology.	NRW (A) agrees with the scoping of impacts for the HRA for Benthic Subtidal and Intertidal Ecology.	Agreed
NRW.HRA.8	Assessment methodology	All European sites with benthic subtidal and intertidal ecology features that have the potential for LSE have been identified within the HRA Stage 1 screening and considered in the Stage 2 ISAA.	NRW (A) agrees with the approach used for determining LSE and all sites within the Zone of Influence (ZOI) have been screened in.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.HRA.9	Assessment methodology	The list of projects screened into the in-combination assessment in the HRA is appropriate.	NRW (A) agrees that the list of projects screened into the in-combination assessment in the HRA is appropriate.	Agreed
NRW.HRA.10	Study area	The HRA study area is appropriate for the receptors, sites and impacts assessed.	NRW (A) agrees with the regional benthic subtidal and intertidal area defined in the PEIR.	Agreed
NRW.HRA.11	Baseline environment	No Annex I habitat features of the Menai Strait and Conwy Bay SAC are present in the overlap with the Mona Offshore Cable Corridor.	NRW (A) agrees after having reviewed the Benthic Technical report that there are no Annex I features of the Menai Strait and Conwy Bay SAC present in the overlap with the Mona Offshore Cable Corridor.	Agreed
NRW.HRA.12	Assessment methodology	The approach used for determining LSE on European sites with Annex I habitats and features is appropriate	NRW (A) agrees with the approach used for determining LSE and all sites within the ZOI have been screened in.	Agreed
NRW.HRA.13	Outcomes of the ISAA (Mona Offshore Wind Project alone)	There will be no adverse effects on the integrity of SACs with benthic subtidal features for the Mona Offshore Wind Project alone.	NRW (A) agrees with the conclusions of the ISAA (APP-032), that provided the mitigation measures outlined are adhered to, the Mona Offshore Wind Project will not have an AEoSI and therefore will not undermine the conservation objectives of the benthic designated features of the Menai Strait and Conwy Bay SAC.	Agreed
NRW.HRA.14	Outcomes of the ISAA (in-combination with other plans and projects)	There will be no adverse effects on the integrity of SACs with benthic subtidal features for the Mona Offshore Wind Project in-combination with other plans and projects.	NRW (A) agrees with the conclusions of the ISAA (APP-032), that provided the mitigation measures outlined are adhered to, the Mona Offshore Wind Project will not have an AEoSI and therefore will not undermine the conservation objectives of the benthic designated features of the Menai Strait and Conwy Bay SAC.	Agreed
Fish and shellfish ecology				
NRW.HRA.15	Screening	Agreement to the screening of impacts for the HRA for fish and shellfish ecology.	NRW (A) agrees with the scoping of impacts for the EIA and HRA for Fish and Shellfish Ecology.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.HRA.16	Assessment methodology	All European sites with fish and shellfish ecology features that have the potential for LSE have been identified within the HRA Stage 1 screening and considered in the Stage 2 ISAA.	NRW (A) agrees that all European sites with fish and shellfish ecology features with potential for LSE have been identified.	Agreed
NRW.HRA.17	Assessment methodology	The list of projects screened into the in-combination assessment in the HRA is appropriate.	NRW (A) agrees with the screening undertaken in the HRA Screening report (APP-034).	Agreed
NRW.HRA.18	Study area	The HRA study area is appropriate for the receptors, sites and impacts assessed.	NRW (A) agrees that the HRA study area is appropriate.	Agreed
NRW.HRA.19	Assessment methodology	The approach used for determining LSE on European sites with Annex II diadromous fish as features is appropriate.	NRW (A) agrees with the approach used for determining LSE on European sites with Annex II diadromous fish.	Agreed
NRW.HRA.20	Outcomes of the ISAA (Mona Offshore Wind Project alone)	There will be no adverse effect on integrity for SACs designated for fish features for any impacts for the Mona Offshore Wind Project alone.	NRW (A) agrees with the screening undertaken in the HRA Screening report (APP-034) and the subsequent Stage 2 assessment (APP-032) and agree with the overall conclusion of no risk of an adverse effect on the integrity of diadromous fish features from the Welsh protected sites; Dee Estuary/Aber Dyfrdwy SAC, River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC, and Afon Gwyrfai a Llyn Cwellyn SAC.	Agreed
NRW.HRA.21	Outcomes of the ISAA (in-combination with other plans and projects)	There will be no adverse effect on integrity for SACs designated for fish features for any impacts for the Mona Offshore Wind Project in-combination with other projects and plans.	NRW (A) agrees with the screening undertaken in the HRA Screening report (APP-034) and the subsequent Stage 2 assessment (APP-032) and agree with the overall conclusion of no risk of an adverse effect on the integrity of diadromous fish features from the Welsh protected sites; Dee Estuary/Aber Dyfrdwy SAC, River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC, and Afon Gwyrfai a Llyn Cwellyn SAC.	Agreed
Marine mammals				
NRW.HRA.22	Screening	Agreement to the screening of impacts for the HRA for marine mammals.	NRW (A) confirms agreement to the approach for LSE Screening for Marine Mammals.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.HRA.23	Assessment methodology	All European sites with marine mammal features with the potential for LSE have been identified within the HRA Stage 1 screening and considered in the Stage 2 ISAA.	NRW (A) confirms agreement to the approach for LSE Screening for Marine Mammals.	Agreed
NRW.HRA.24	Assessment methodology	The list of projects screened into the in-combination assessment in the HRA is appropriate.	NRW(A) agrees with the list of projects screened into the in-combination assessment in the HRA.	Agreed
NRW.HRA.25	Study area	The HRA study area is appropriate for the receptors, sites and impacts assessed.	NRW (A) agrees with the data collected through surveys and literature including the data sources used to characterise the baseline, as well as the management unit approach adopted (APP-056).	Agreed
NRW.HRA.26	Assessment methodology	The approach used for determining LSE on European sites with Annex II marine mammals as features is appropriate, and all the relevant sites have been identified.	NRW (A) confirms agreement to the approach for LSE Screening for Marine Mammals.	Agreed
NRW.HRA.27	Assessment methodology	Agreement on the use of the area-based approach for HRA based on Effective Deterrent Range (EDR) and 143 dB threshold	NRW (A) agrees with the proposed approach for the HRA which presents results using two parallel methods: EDRs (in line with the JNCC 2020 guidance) and the modelled results for a single strike 143 dB SELthreshold (in line with the NRW 2023 position statement).	Agreed
NRW.HRA.28	Outcomes of the ISAA (Mona Offshore Wind Project alone)	There will be no adverse effects on integrity for SACs designated for marine mammal features for any impacts for the Mona Offshore Wind Project alone.	NRW(A) can confirm that we agree with the overall conclusions of the ISAA, notwithstanding any written representations raised that are currently ongoing points of discussion.	Agreed
NRW.HRA.29	Outcomes of the ISAA (in-combination with other plans and projects)	There will be no adverse effects on integrity for SACs designated for marine mammal features for any impacts for the project in-combination with other projects and plans.	NRW(A) can confirm that we agree with the overall conclusions of the ISAA in combination with other plans and projects notwithstanding any written representations raised that are currently ongoing points of discussion.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
Offshore ornithology				
NRW.HRA.30	Screening	Agreement to the screening of impacts for the HRA for offshore ornithology.	NRW (A) agrees with the screened impacts	Agreed
NRW.HRA.31	Screening	Agreement on the approach to identifying sites and features in the HRA Stage 1 Screening.	This is agreed, with caveats. As noted in our Relevant Representations (RR-011), the approach taken by the Applicant in this assessment may be considered appropriate regarding the project alone assessment for this particular project, where there is potential connectivity to a very large number of sites, but the likelihood of substantial impacts is generally low. It should be acknowledged however (this is where the caveat should be considered), that this approach will not necessarily be appropriate for all offshore wind cases.	Agreed with caveats

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.HRA.32	Screening	Agreement on approach to HRA Stage 1 Screening using outputs for CRM, displacement assessment and associated apportioning.	<p>This is agreed, with caveats. As was noted during the EWG, NRW consider LSE is a coarse screening filter, should be simple, and if further evidence is brought in, then effectively this should be part of the Appropriate Assessment (AA). This provides a transparent approach that can be followed through the ISAA. NRW (A) would therefore expect all sites where a qualifying feature has been recorded on the development site and where there is potential connectivity (e.g. within foraging range) and a potential impact pathway (e.g. displacement or collision) and hence the potential to undermine the conservation objectives for the feature, to be carried through to the AA phase. Any additional work looking at e.g. apportioning impacts and assessments of predicted impacts against baseline mortality etc. should be included in the AA. However, following discussions with the Applicant during the EWG, a compromise solution was reached, which is the approach taken in the assessment. As noted on point NRW.HRA.31 above, the approach taken by the Applicant may be considered appropriate for this project alone. It should be acknowledged however (this is where the caveat should be considered), that this approach will not necessarily be appropriate for all offshore wind cases.</p>	Agreed with caveats

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.HRA.33	Assessment methodology	All European sites with offshore ornithology features with the potential for LSE have been identified within the HRA Stage 1 screening and considered in the Stage 2 ISAA.	As noted in our Relevant Representations (RR-011) the Applicant's assessment is difficult to follow and unclear in places and there are errors in some of the figures at EIA, which will potentially follow through to the apportioned impacts which may affect the outcomes of the HRA Stage 1 screening and hence sites considered in the Stage 2 ISAA. Additionally, as noted in our comments on point NRW.OO.14 above, we do not agree with a number of aspects/methods used in the apportionment of impacts to designated sites, which again may have impacts on the results of the HRA Stage 1 screening and Stage 2 ISAA.	Ongoing point of discussion
NRW.HRA.34	Assessment methodology	The list of projects screened into the in-combination assessment in the HRA is appropriate.	NRW (A) agrees with the projects screened into the EIA in-combination assessment. However, as noted above on points NRW.OO.19-20, we have concerns regarding the lack of data for the projects screened into the assessment.	Ongoing point of discussion
NRW.HRA.35	Study area	The HRA study area is appropriate for the receptors, sites and impacts assessed.	NRW (A) agrees with the data collected through surveys and literature including the data sources used to characterise the baseline; we agree with the receptors; we agree with the impacts assessed, but please see NRW.OO.14, NRW.OO.15, NRW.OO.18, NRW.OO.19, NRW.OO.20 with respect to errors that need to be rectified.	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.HRA.36	Mitigation and monitoring	The Offshore Environmental Management Plan (EMP) will include a timing restriction of no offshore export cable installation during the period 01 November to 31 March within the Liverpool Bay SPA.	NRW (A) considers that the timing restriction is appropriate to mitigate AEoSI from disturbance due to cable laying activities on red throated diver (RTD) and common scoter features of Liverpool Bay SPA if it is adequately secured within the conditions of the licence. However, we note that the timing restriction aspect of the EMP is not included within the list of information to be included in the EMP listed within Part e of point 18 of conditions listed in Part 2 of Schedule 14 of 'Document C1 draft Development Consent Order' submitted by the Applicant as PDA-003 (clean) and PDA-004 (tracked). Further detail on this can be found in our Written Representations.	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.HRA.37	Outcomes of the ISAA (Mona Offshore Wind Project alone)	There will be no adverse effect on integrity for SPAs designated for offshore ornithology features for any impacts from the Mona Offshore Wind Project alone.	NRW (A) cannot currently agree with this. Whilst we consider it likely that the predicted impacts from the Mona project alone to Welsh sites are likely to be small and result in no AEOsI, the assessment and process of reaching the predicted impacts in the HRA Stage 1 Screening Report (APP-034) and HRA Stage 2 ISAA SPAs and Ramsars (APP-033) is currently difficult to follow and unclear in places. We note the issues raised to point NRW.OO.18 above regarding areas of uncertainty, inconsistency and errors in the EIA scale assessments and figures, which will have fed through to the apportioned impacts. We also note our disagreements on the apportionment methodology as set out in our response to NRW.OO.14 above. In addition, as noted in our Relevant Representations (RR-011) the Applicant has not presented assessments of displacement impacts to designated site features for the range of SNCB advised % displacement and % mortality rates. Further information on the reasoning for why assessment covering a range of rates is required is set out in our Written Representations. We will be unable to reach definite conclusions on whether AEOsI can be ruled out from the project alone for Welsh designated sites until these issues are suitably addressed by the Applicant.	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.HRA.38	Outcomes of the ISAA (in-combination with other projects and plans)	There will be no adverse effect on integrity for SPAs designated for offshore ornithology features for any impacts from the Mona Offshore Wind Project in-combination with other projects and plans.	As noted in our Relevant Representations (RR-011), the Applicant has taken an approach where if the predicted impact from the project alone equates to less than 0.05% of baseline mortality of a designated site then it is deemed non-material and within natural fluctuations of the population and is therefore screened out of in-combination assessment. This has resulted in all Welsh SPAs except Liverpool Bay SPA being screened out of in-combination assessment. Whilst this approach <u>may</u> be appropriate for this project where predicted impacts from the project alone are likely very small, it may not be appropriate in other situations. However, we are not in a position a present to make any comment/agreement on the level of significance of in-combination effects for the reasons set out in our comments to points NRW.OO.18, NRW.OO.20 and NRW.HRA.37 above. These issues need to be addressed and assessments updated before we can make any conclusions/provide any advice regarding whether AEOI can be ruled out for the project in combination with other plans and projects for any Welsh designated sites.	Ongoing point of discussion