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JNCC Reference: OIA-10404 JNCC Registration ID Number: 20048439 PINS Reference: EN010137 Date: 27 August 2024

By email: monaoffshorewindproject@planninginspectorate.gov.uk

To whom it may concern,

Mona Offshore Wind Project Development Consent Order Application – Environmental Statement and Management Plans – EN010137 – Response to the Rule 17 letter issued on 16 August 2024

Thank you for consulting JNCC on the Mona Offshore Wind Project Development Consent Order (DCO) Application including the Environmental Statement (ES) and Management Plans. Notification of acceptance for examination by the Secretary of State for Energy Security and Net Zero was received on 2 April 2024.

The advice contained within this minute is provided by JNCC as part of our statutory advisory role to the UK Government and devolved administrations on issues relating to nature conservation in UK offshore waters (beyond the territorial limit). We have subsequently concentrated our comments on aspects of the documents that we believe relate to offshore waters and defer to comments provided by Natural Resources Wales Advisory (NRW-A) for aspects relating to inshore waters and Natural England (NE) were appropriate.

The advice below relates to the Rule 17 letter issued on 16 August 2024.

"The Overarching National Policy Statement for energy (NPS EN-1) states that a derogation case should be provided by an Applicant as soon as is reasonably possible and before the close of the examination if a SNCB gives an indication in examination that the Proposed Development is likely to adversely impact the integrity of habitat sites. JNCC [RR-033] [REP1-066] has previously stated it cannot agree with the Applicant's conclusions, particularly in respect of the Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro Special Protected Area (SPA). The ExA requests that NRW(A)

The Joint Nature Conservation Committee (JNCC) is the statutory adviser to Government on UK and international nature conservation, on behalf of the Council for Nature Conservation and the Countryside, Natural Resources Wales, Natural England and NatureScot. Its work contributes to maintaining and enriching biological diversity, conserving geological features and sustaining natural systems. JNCC Support Co. Registered in England and Wales, Company No: 05380206. Registered Office: JNCC, Monkstone House, City Road, Peterborough, PE1 1JY, UK. and JNCC confirm their position by Deadline 2 (27 August 2024) whether an adverse effect beyond reasonable scientific doubt cannot be ruled out for any European site."

We are currently unable to rule out adverse effect due to the Proposed Development beyond reasonable scientific doubt for any habitats site. This is due to errors in calculations, lack of necessary detail, and the use of methods and parameters which are different from those advised by SNCBs. Therefore, we have very little confidence in the outcomes of the assessments submitted by the Applicant to date.

We note that the Examining Authority has requested that the Applicant corrects these errors and omissions, and provides updated assessments as a result in submissions to the Examination by Deadline 3 (30 September 2024). JNCC looks forward to having sight of those submissions, on which we intend to submit comments by Deadline 4 (4 November 2024).

For the avoidance of doubt, JNCC's position is not that an adverse effect on the integrity of a habitat site is inevitable. JNCC considers it is possible that the Applicant's submissions at Deadline 3 may overcome our concerns. However, at present JNCC cannot advise that the integrity of habitats sites will be preserved.

Please contact me with any questions regarding the above comments.

Yours sincerely,

Richard Shelmerdine Offshore Industries Adviser