



**Cyfoeth  
Naturiol**  
Cymru  
**Natural  
Resources**  
Wales

**Ein cyf/Our Ref:** AOS-21167-0032  
**Eich cyf/Your ref:** EN010137  
**Our Unique Ref:** 20048445

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Dyddiad/Date: 27 August 2024

Er sylw / For the attention of: Jake Stephens

Annwyl / Dear Jake,

**FFERM WYNT ALLTRAETH MONA / PROPOSED MONA OFFSHORE WINDFARM**

**CYFEIRNOD YR AROLYGIAETH GYNLLUNIO / PLANNING INSPECTORATE  
REFERECE: EN010137**

**EIN CYFEIRNOD / OUR REFERENCE: 20048445**

**RE: NATURAL RESOURCES WALES' RESPONSE TO THE EXAMINING AUTHORITY'S  
REQUEST FOR FURTHER INFORMATION UNDER RULE 17 (DATED 15 AUGUST 2024)**

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Thank you for your Rule 17 request letter, dated 15 August 2024, requesting Cyfoeth Naturiol Cymru / Natural Resources Wales' comments regarding the above.

Our comments are made without prejudice to any further comments we may wish to make in relation to this application and examination whether in relation to the Environmental Statement (ES) and associated documents, provisions of the draft Development Consent Order ('DCO') and its Requirements, or other evidence and documents provided by bpENBW ('the Applicant'), the Examining Authority or other Interested Parties.

The Rule 17 request directed to NRW (A) states:

*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) 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 note that the above requests that NRW (A) confirm its position as to whether an adverse effect, beyond reasonable scientific doubt, cannot be ruled out for any European site. NRW (A) are currently in discussions with the Applicant on a number of matters, and it is our understanding that the Applicant is working to address issues such as those raised within our Written Representations (REP1-056) and those pertaining to any potential impacts to European sites. As the Applicant has not yet had the opportunity to put forward their response to our Written Representations, and in turn we have not been able to consider or submit any representation to any response the Applicant may make with respect to our Written Representations, or comment on progress that may have been made on issues previously raised, we are not currently able to confirm definitively whether we consider that an adverse effect, beyond reasonable scientific doubt, cannot be ruled out for any European site.

Whilst at this stage we can indicate that we consider it unlikely that there will be an Adverse Effect On Site Integrity for any European Site as a result of the Mona development, this cannot be confirmed until both parties have had sufficient time to fully and comprehensively review current and forthcoming submissions.

In summary, we do not consider it to be reasonably possible to answer this request at this stage, beyond reasonable scientific doubt. We will, however, continue to work with the Applicant to resolve issues where possible, and will endeavour to answer the Examining Authority's request at the earliest opportunity.

Please do not hesitate to contact Emma Lowe ( [REDACTED] )  
Nia Phillips ( [REDACTED] ) and Siôn Williams ( [REDACTED] )  
[REDACTED] ) should you require further advice or information regarding the above.

Yn gywir / Yours sincerely,

[REDACTED]  
**Andrea Winterton**  
**Marine Services Manager**  
**Natural Resources Wales**