

MONA OFFSHORE WIND PROJECT

Response to JNCC Rule 17 Letter

Deadline: 3

Application Reference: EN010137

Document Reference: S_D3_5

Document Number: MOCNS-J3303-RPS- 10304

30 September 2024

F01



Image of an offshore wind farm

MONA OFFSHORE WIND PROJECT

Document status

| Version | Purpose of document | Authored by | Reviewed by | Approved by | Review date |
|----------------|----------------------------|--------------------|------------------------|------------------------|--------------------|
| F01 | Submission at D3 | RPS | Mona Offshore Wind Ltd | Mona Offshore Wind Ltd | 30 Sept 2024 |

Prepared by:

RPS

Prepared for:

Mona Offshore Wind Ltd.

MONA OFFSHORE WIND PROJECT

Contents

RESPONSE TO JNCC RULE 17 LETTER 1

1 RESPONSE TO JNCC RULE 17 LETTER 1

 1.1 Introduction 1

2 RESPONSES TO JNCC RULE 17 LETTER..... 2

 2.1 Joint Nature Conservation Committee..... 2

Tables

Table 2.1: REP2-098 – Joint Nature Conservation Committee 2

MONA OFFSHORE WIND PROJECT

Glossary

| Term | Meaning |
|------------------------------------|--|
| Applicant | Mona Offshore Wind Limited. |
| Appropriate Assessment | A step-wise procedure undertaken in accordance with Article 6(3) of the Habitats Directive, to determine the implications of a plan or project on a European site in view of the site's conservation objectives, where the plan or project is not directly connected with or necessary to the management of a European site but likely to have a significant effect thereon, either individually or in-combination with other plans or projects. |
| Inter-array cables | Cables which connect the wind turbines to each other and to the offshore substation platforms. Inter-array cables will carry the electrical current produced by the wind turbines to the offshore substation platforms. |
| Interconnector cables | Cables that may be required to interconnect the Offshore Substation Platforms in order to provide redundancy in the case of cable failure elsewhere. |
| Landfall | The area in which the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling. |
| Mona Array Area | The area within which the wind turbines, foundations, inter-array cables, interconnector cables, offshore export cables and offshore substation platforms (OSPs) forming part of the Mona Offshore Wind Project will be located. |
| Mona Offshore Wind Project | The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities. |
| National Policy Statement (NPS) | The current national policy statements published by the Department for Energy Security & Net Zero in 2024. |
| Offshore Substation Platform (OSP) | The offshore substation platforms located within the Mona Array Area will transform the electricity generated by the wind turbines to a higher voltage allowing the power to be efficiently transmitted to shore. |
| Wind turbines | The wind turbine generators, including the tower, nacelle and rotor. |

Acronyms

| Acronym | Description |
|---------|---|
| ExA | Examining Authority |
| ISAA | Information to support the Appropriate Assessment |
| JNCC | Joint Nature Conservation Committee |
| NRW | Natural Resources Wales |
| OSP | Offshore Substation Platform |
| SNCB | Statutory Nature Conservation Bodies |
| SPA | Special Protection Area |

MONA OFFSHORE WIND PROJECT

Units

| Unit | Description |
|-----------------|--------------------|
| GW | Gigawatt |
| km | Kilometres |
| km ² | Kilometres squared |
| kV | Kilovolt |
| MW | Megawatt |
| nm | Nautical miles |

1 Response to JNCC Rule 17 Letter

1.1 Introduction

1.1.1.1 The Applicant has responded to JNCC's Rule 17 letter below.

2 Responses to JNCC Rule 17 Letter

2.1 Joint Nature Conservation Committee

Table 2.1: REP2-098 – Joint Nature Conservation Committee

| Reference | Written Submission Comment | Applicant's response |
|------------|--|--|
| REP2-098.1 | <i>"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."</i> | <p>The Applicant welcomes the JNCCs response and confirmation that at this stage an adverse effect on the integrity of a habitat site is not inevitable. The Applicant has responded to the JNCC's written representation (REP1-066/REP1-067) at Deadline 2 (see Appendix to Responses to WRs: JNCC ((REP2-081)) and is continuing to work with the JNCC to address the issues raised.</p> <p>As outlined in the Applicants Response to the Examining Authority's Rule 17 Letter (REP2-077), several application documents were updated and submitted (as tracked and clean versions) at Deadline 2 to address the errata presented in the Errata Sheet (REP1-044) and any further discrepancies considered to be errata identified in NRW's and the Joint Nature Conservation Committee's (JNCC) written representations (REP1-056 and REP1-066/REP1-067, respectively).</p> <p>Several additional minor errata have been identified since submission of the updated application materials at Deadline 2. These have been recorded in the Errata Sheet (S_PD_1 F04) and an Offshore Ornithology Errata Clarification Note (S_D3_26) submitted at Deadline 3. None of the errata identified in the application materials alter the conclusions presented in Volume 2, Chapter 5: Offshore Ornithology (REP2-016) and the HRA Stage 2 Information to Support an Appropriate Assessment (ISAA) Part Three: Special Protection Areas (SPAs) and Ramsar Sites Assessments (REP2-010).</p> <p>The Applicant has also submitted an Offshore Ornithology Supporting Information Technical Note (S_D3_19) at Deadline 3, which brings together the key assessment information, with clear signposting to where this and further supporting details can be found within the application documents. In addition, it presents additional information in accordance with the advice of the statutory nature conservation bodies (SNCBs). The Applicant has engaged with the JNCC and NRW on the scope and presentation of this clarification note to ensure this sufficiently addresses the SNCBs concerns and the Examining Authority's Request for Further Information – Rule 17 (PD-012/PD-012a).</p> |
| REP2-098.2 | 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. | |
| REP2-098.3 | 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). | |

MONA OFFSHORE WIND PROJECT

| Reference | Written Submission Comment | Applicant's response |
|------------|---|---|
| REP2-098.4 | <p>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.</p> | <p>The Applicant considers that the information provided at Deadlines 2 and 3 provides a sufficient understanding of the potential impacts on habitat sites for the SNCBs to confirm their position with respect to the Habitats Regulations Assessment conclusions for the Mona Offshore Wind Project.</p> |