

MONA OFFSHORE WIND PROJECT

Response to Natural Resource Wales Rule 17 Letter

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Image of an offshore wind farm

MONA OFFSHORE WIND PROJECT

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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 Array Scoping Boundary	The Preferred Bidding Area that the Applicant was awarded by The Crown Estate as part of Offshore Wind Leasing Round 4.
Mona Offshore Cable Corridor	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export 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 the offshore export cables will be located and in which the intertidal access areas are located.
Mona Offshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area encompassing and located between the Mona Potential Array Area and the landfall up to MHWS, in which the offshore export cables 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.
Non-statutory consultee	Organisations that an applicant may choose to consult in relation to a project who are not designated in law but are likely to have an interest in the project.
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.

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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

Units

Unit	Description

1 Response to Natural Resource Wales Rule 17 Letter

1.1 Introduction

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

2 Response to Natural Resource Wales Rule 17 Letter

2.1 Natural Resources Wales

Table 2.1: REP2-100 - Natural Resources Wales (NRW)

Reference	Written Submission Comment	Applicant's response
REP2-100.1	<p>The Rule 17 request directed to NRW (A) states:</p> <p><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> <p>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</p>	<p>The Applicant welcomes NRW's response and confirmation that, at this stage, NRW considers it unlikely that there will be an Adverse Effect on Site Integrity for any European Site as a result of the Mona Offshore Wind Project. The Applicant has responded to NRW (A)'s written representation (REP1-056) at Deadline 2 (see Appendix to Response to WRs: NRW (REP2-080)) and is continuing to work with NRW (A) 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 at Deadline 3 (S_D3_19), 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 supporting information technical 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>

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Reference	Written Submission Comment	Applicant's response
	that an adverse effect, beyond reasonable scientific doubt, cannot be ruled out for any European site.	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.
REP2-100.2	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.	
REP2-100.3	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.	