

MONA OFFSHORE WIND PROJECT

Response to NRW Deadline 3 Submissions – Ecology (Terrestrial)

Deadline: 5

Application Reference: EN010137

Document Reference: S_D5_7

Document Number: MOCNS-J3303-RPS-10437

3 December 2024

F01



Image of an offshore wind farm

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Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
F01	Submission at D5	RPS	Mona Offshore Wind Ltd	Mona Offshore Wind Ltd	3 Dec 2024

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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.
Bodelwyddan National Grid Substation	This is the Point of Interconnection (POI) selected by the National Grid for the Mona Offshore Wind Project.
Competent Authority	Regulation 6(1) defines competent authorities as "any Minister, government department, public or statutory undertaker, public body of any description or person holding a public office".
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Mona Offshore Wind Project.
Evidence Plan Process	The Evidence Plan process is a mechanism to agree upfront what information the Applicant needs to supply to the Planning Inspectorate as part of the Development Consent Order (DCO) applications for the Mona Offshore Wind Project.
Expert Working Group (EWG)	Expert working groups set up with relevant stakeholders as part of the Evidence Plan process.
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.
Intertidal access areas	The area from Mean High Water Springs (MHWS) to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities.
Intertidal area	The area between MHWS and MLWS.
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.
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
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,

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	licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).
Maximum Design Scenario (MDS)	The scenario within the design envelope with the potential to result in the greatest impact on a particular topic receptor, and therefore the one that should be assessed for that topic receptor.
Mona 400kV Grid Connection Cable Corridor	The corridor from the Mona onshore substation to the National Grid substation at Bodelwyddan.
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.
Mona Offshore Wind Project Boundary	The area containing all aspects of the Mona Offshore Wind Project, both offshore and onshore.
Mona Offshore Wind Project PEIR	The Mona Offshore Wind Project Preliminary Environmental Information Report (PEIR) that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Offshore Wind Project Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Onshore Cable Corridor	The corridor between MHWS at the landfall and the Mona onshore substation, in which the onshore export cables will be located.
Mona Onshore Development Area	The area in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid substation will be located
Mona Onshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area located between MHWS at the landfall and the onshore National Grid substation, in which the onshore export cables, onshore substation and other associated onshore transmission infrastructure will be located.
Mona PEIR Offshore Cable Corridor	The corridor presented at PEIR that was consulted on during statutory consultation and has subsequently been refined for the application for Development Consent. It is located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables and the offshore booster substation will be located.

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Mona PEIR Offshore Wind Project Boundary	The area presented at PEIR containing all aspects of the Mona Offshore Wind Project, both offshore and onshore. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Potential Array Area	The area that was presented in the Mona Scoping Report and in the PEIR as the area within which the wind turbines, foundations, meteorological mast, inter-array cables, interconnector cables, offshore export cables and OSPs forming part of the Mona Offshore Wind Project were likely to be located. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Proposed Onshore Development Area	The area presented at PEIR in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid infrastructure will be located. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
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.
Offshore Wind Leasing Round 4	The Crown Estate auction process which allocated developers preferred bidder status on areas of the seabed within Welsh and English waters and ends when the Agreements for Lease (AfLs) are signed.
Pre-construction site investigation surveys	Pre-construction geophysical and/or geotechnical surveys undertaken offshore and, or onshore to inform, amongst other things, the final design of the Mona Offshore Wind Project.
Point of Interconnection	The point of connection at which a project is connected to the grid. For the Mona Offshore Wind Project, this is the Bodelwyddan National Grid Substation.
Relevant Local Planning Authority	The Relevant Local Planning Authority is the Local Authority in respect of an area within which a project is situated, as set out in Section 173 of the Planning Act 2008. Relevant Local Planning Authorities may have responsibility for discharging requirements and some functions pursuant to the DCO, once made.
the Secretary of State for Business, Energy and Industrial Strategy	The decision maker with regards to the application for development consent for the Mona Offshore Wind Project.
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to the Planning Act 2008 in relation to an application for development consent. Not all consultees will be statutory consultees (see non-statutory consultee definition).

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Term	Meaning
Wind turbines	The wind turbine generators, including the tower, nacelle and rotor.
The Planning Inspectorate	The agency responsible for operating the planning process for NSIPs.

Acronyms

Acronym	Description
AfL	Agreement for Lease
BEIS	Department for Business, Energy and Industrial Strategy
BNG	Biodiversity net gain
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
EWG	Expert Working Group
HVAC	High Voltage Alternating Current
IEF	Important Ecological Feature
IEMA	Institute for Environmental Management and Assessment
ISAA	Information to support the Appropriate Assessment
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
NBB	Net Benefits for Biodiversity
NRW	Natural Resources Wales
NSIP	Nationally Significant Infrastructure Project
NTS	Non-Technical Summary
OSP	Offshore Substation Platform
PDE	Project Design Envelope
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
POI	Point of Interconnection
SAC	Special Area of Conservation
SoCC	Statement of Community Consultation
SPA	Special Protection Area
TCE	The Crown Estate
WTW	Wildlife Trust Wales
TWT	The Wildlife Trusts

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Units

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

1 RESPONSE TO NRW DEADLINE 3 SUBMISSIONS – ECOLOGY (TERRESTRIAL)

1.1 Introduction

1.1.1.1 The Applicant's response to Natural Resource Wales (NRW) Deadline 3 submissions on terrestrial ecology have been provided below.

1.2 Response to NRW D3 Submission

1.2.1 Ecology (Terrestrial)

Table 1-1 REP3-090 – Natural Resource Wales Advisory – Ecology (Terrestrial)

Planning Inspectorate Ref. No.	NRW D3 Written Submission comment	Applicant's response
REP3-090.215	2.4 Ecology (Terrestrial) 212. REP2-080; para REP1-056.258: We note and welcome the identified updates to the to the Outline LEMP.	The Applicant notes the response of NRW (A).
REP3-090.216	213. REP2-080; para REP1-056.259: We note and welcome the commitment to transfer the occupancy of ecology areas to a body that accords with the definition of a responsible body under Part 7 of the Environment Act 2021. We note monitoring proposals during the operational phase have not been updated. We advise that monitoring is undertaken annually.	The Applicant has committed to a programme of monitoring for up to 30-years within the updated Outline LEMP submitted at Deadline 4 (J22 F03). The frequency/ regularity of the monitoring will reflect the details of the planting agreed with the relevant authorities as part of the final LEMP. Protected species monitoring will be undertaken as required under the NRW European Protected Species (EPS) mitigation licence conditions.
REP3-090.217	214. We note the outline habitat management prescriptions. However, no detail is given in respect of species-specific prescriptions, e.g. if fish or invasive non-native species are recorded.	The updated Outline LEMP (as submitted at Deadline 4 (J22 F03)) includes provisions for the removal of fish from ponds and treatment/ removal of invasive non-native species (Section 1.8). An additional 'Biosecurity Protocol' section has been added to section 1.7.6 of the Outline LEMP (J22 F03), which cross references the outline Biosecurity Protocol (REP2-060) that is part of the Construction Code of Practice (CoCP).
REP3-090.218	215. Site liaison, wardening, incident reporting and response arrangements appears to have not been considered in the updated outline LEMP.	The site liaison, wardening and incident reporting responsibilities will be assigned within the final LEMP. An 'Environmental Manager' role has been added to the Outline LEMP in Section 1.6 (J22 F03), whose responsibility will be overseeing the long-term management and monitoring.
REP3-090.219	216. Provision for periodic review mechanism for the long-term management plan appears to have not been considered in detail. We suggest every five years or timescales to be agreed by the LPA and NRW.	A section relating to long-term management provisions and review has been added to the Outline LEMP (Section 1.7.8) (J22 F03). The frequency of review will be defined in the final LEMP and agreed with the relevant authorities.

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Planning Inspectorate Ref. No.	NRW D3 Written Submission comment	Applicant's response
REP3-090.220	217. Contingency measures – the updated OLEMP does not appear to have considered this component requirement in any detail.	Contingency measures will be included within the final LEMP as it will be informed by the detailed landscape and ecology management strategy, and monitoring targets and objectives.
REP3-090.221	218. We welcome confirmation of the updated tenure proposals for the ecology areas. We advise tenure changes of the ecology areas (i.e. to a body that accords with the definition of a responsible body under Part 7 of the Environment Act 2021) is completed prior to the commencement of the operational phase of the proposals.	The Applicant notes the response of NRW (A).
REP3-090.222	219. No details are provided in respect of skills, competencies and licences for (a) surveillance and (b) management works.	<p>The roles and responsibilities for each of the environmental project team are defined in Section 1.6 of the Outline LEMP (J22 F03); for long-term management this will be defined in the final LEMP and will be informed by the detailed landscape design.</p> <p>The Named Ecologist for each of the EPS mitigation licences (GCN, bats, dormouse and badger) must demonstrate they have the relevant level of skills and experience in order for NRW to grant a licence.</p>
REP3-090.223	220. Limited detail is provided in respect of reporting of management and surveillance. We advise that surveillance results are uploaded annually into the Wales GCN Monitoring Scheme. We welcome proposals to report on management and surveillance to the St Asaph GCN Working Group.	<p>Reporting of management and surveillance for the Great Crested Newt licence (including timescales) will be administered by NRW licensing team and will be a condition of the EPS mitigation licence for the scheme.</p> <p>Paragraph 1.6.1.14 of the Outline LEMP (J22 F03) has been updated to confirm surveillance results will be uploaded to the Wales GCN Monitoring Scheme, and the Applicant will continue to engage with the St Asaph GCN Working Group throughout the monitoring period.</p>
REP3-090.224	221. Further advice is provided below in Annex B in regard to the updated Outline Landscape and Ecology Management Plan (REP2-035) and updated Outline Biosecurity Protocol (REP2-061).	The Applicant's response is included in Section Error! Reference source not found.

Table 1-2: REP3-090 – Natural Resource Wales Advisory – Annex B NRW (A) comments on the updated Outline Landscape and Ecology Management Plan (REP2-035) and updated Outline Biosecurity Protocol (REP2-061) submitted by the Applicant at Deadline 2.

Planning Inspectorate Ref. No.	NRW D3 Written Submission comment	Applicant's response
REP3-090.273	<p>ANNEX B</p> <p>NRW (A) comments on the updated Outline Landscape and Ecology Management Plan (REP2-035) and updated Outline Biosecurity Protocol (REP2-061) submitted by the Applicant at Deadline 2.</p> <p>Outline Biosecurity Protocol - F01_F02 (Tracked):</p> <ol style="list-style-type: none"> 1.4.1.4 We advise that Externally appointed Ecological Compliance Auditors assess contractor /sub-contractor compliance with biosecurity protocols. 1.7 We advise Ecological Compliance Audits are also referenced in monitoring. Reference to GB INNS website is advocated. 	<p>The Applicant has agreed that these measures will be included within the final Biosecurity Protocol.</p>
REP3-090.274	<p>Outline Landscape and Ecology Management Plan F01_F02 (tracked)</p> <p>i. habitat management prescriptions for aquatic and terrestrial habitats;</p> <ol style="list-style-type: none"> 1. This has been considered in the OLEMP. However no detailed provisions concern fish or invasive plant species issues. 	<p>Please refer to the Applicant's response in REP3-090-217.</p>
REP3-090.275	<p>ii. site liaison, wardening, incident reporting and response arrangements</p> <ol style="list-style-type: none"> 1. Site liaison, wardening, incident reporting and response arrangements appears to have not been considered in the updated outline LEMP. 	<p>Please refer to the Applicant's response in REP3-090-218.</p> <p>Habitat and protected species targets and objectives will be included within the final LEMP, and this will inform the thresholds/ triggers for remedial action e.g. additional habitat management</p>
REP3-090.276	<p>iii. provision for periodic review mechanism for the long-term management plan;</p> <ol style="list-style-type: none"> 1. Provision for periodic review mechanism for the long-term management plan appears to have not been considered in detail. We suggest every five years or timescales to be agreed by the LPA and NRW. 	<p>Please refer to the Applicant's response in REP3-090-219.</p>

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Planning Inspectorate Ref. No.	NRW D3 Written Submission comment	Applicant's response
REP3-090.277	<p>iv. contingency measures that are capable of being implemented in the event of failure to undertake or appropriately implement management or surveillance prescriptions including any required actions arising from unforeseen situations;</p> <p>1. Contingency measures – the updated OLEMP does not appear to have considered this component requirement in any detail.</p>	Please refer to the Applicant's response in REP3-090-220.
REP3-090.278	<p>v. current and proposed changes to tenure of the ecology area to be approved by the discharging authority in consultation with NRW to ensure appropriate control</p> <p>1. Section 1.6.1.13, we welcome and are pleased to note reference to the responsible body.</p>	The Applicant welcomes NRW (A)'s response.
REP3-090.279	<p>Paragraph 1.7.3.2 Final LEMP.</p> <p>1. We look forward to receipt of the final LEMP.</p>	The Applicant notes NRW (A)'s response.
REP3-090.280	<p>1.5/1.8. Outline habitat maintenance and management</p> <p>1. We advise that a component provision of this plan identifies:</p> <p>(a) ecological features (species and habitats)</p> <p>(b) Target for each defined ecological feature.</p>	<p>These measures will be included within the final LEMP as the targets and objectives will be tailored to relevant land parcels/ habitat types and are thus dependent on the development of the final landscaping design and ecology mitigation strategy.</p> <p>The final LEMP will include thresholds and triggers for remedial action, and contingency measures to be adopted where habitats/ protected species are not meeting targets and/ or not making sufficient progress towards meeting targets.</p>
REP3-090.281	1.8.1 Pond targets	The Applicant considers that this target is not reflective of the most recent baseline peak GCN population counts, resulting from GCN surveys undertaken in spring 2024 to inform a European Protected Species (EPS)

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Planning Inspectorate Ref. No.	NRW D3 Written Submission comment	Applicant's response
	<p>1. We advise the inclusion of GCN targets. We suggest monitoring Key Performance Indicator is set at torch counts of 50 individuals in 5 or more ponds.</p>	<p>mitigation licence application to NRW (as set out in the oLEMP). The spring 2024 surveys indicate a 'low' population size class category for individual ponds. The Applicant agrees that a suitable target can be agreed within the final LEMP, but that it would be more realistic and achievable if this is set at a proportional increase to the total baseline peak GCN count across the site, to reflect a target of enhancement for the wider metapopulation rather than on an individual pond basis. The Applicant will continue to engage with NRW on this matter and will include the agreed Key Performance Indicator within the final LEMP.</p>
REP3-090.282	<p>1.8.3.13 Pond management</p> <p>1. We advise that EPS licensing requirements are identified for pond management. Management of terrestrial habitat may also require EPS licences.</p>	<p>In the short- to medium-term, pond and terrestrial habitat management would fall within the remit of the GCN EPS mitigation licence for the period in which the licence was valid (which is typically 10 years). In the long-term, once outside the licenced period, pond and terrestrial habitat management would be undertaken in such a manner as to avoid any accidental killing/ injury of newts, or disturbance to newt habitats (e.g. through sensitive timing of works to ponds). It is not anticipated that these activities would trigger the need for a specific EPS mitigation licence, and nor is this usually required. However, this would be kept under review as it may be the case that more significant pond management works for example, could require an EPS mitigation licence.</p>
REP3-090.283	<p>1.9.2 Woodland</p> <p>1. We advise woodland prescriptions include fallen deadwood. Studies have shown the size of GCN populations is directly proportional to the quantity of fallen deadwood.</p>	<p>The Outline LEMP (J22 F03) has been amended to include provision for deadwood habitat creation in woodland (Section 1.9.2).</p>
REP3-090.284	<p>1.9.6 Ponds</p> <p>1. Note potential EPS licensing requirement (This also applies to terrestrial habitat management).</p> <p>2. We advise a strategically focused rotational approach to "pondscape" management. This approach aims to ensure a diversity of seral conditions within the pond network (or pondscape) at this site.</p>	<p>1 – The Applicant considers that EPS mitigation licencing is unlikely to be necessary for long-term pond management (i.e. works undertaken outside the period in which the licence is valid), however as set out above in REP3-090.283 this will be kept under review.</p> <p>2 – Pond management can be included within the final LEMP once the exact location of the GCN mitigation ponds has been agreed. A reference</p>

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Planning Inspectorate Ref. No.	NRW D3 Written Submission comment	Applicant's response
	3. No reference to INNS or fish management	to rotational pondscape management has been added to the Outline LEMP in Section 1.9.6 (J22 F03). 3 – the Outline LEMP has been updated (J22 F03) to include provisions for the removal of fish from ponds (reference to removal of invasive species is already included in Section 1.9.6).
REP3-090.285	Table 1.1 1. Pre-Construction Surveys are noted. (NB this is a future management plan). Advise that this should be included in the CEMP.	The Applicant advises that pre-construction surveys are set out in Table 1.1 of the Outline LEMP (J22 F03). Paragraph 1.10.5.3 of the Outline Code of Construction Practice (J26 F03) refers to the pre-construction surveys which will be undertaken for protected species.
REP3-090.286	Bats: - Onshore Site Preparation and Construction 1.10.2.17 – 1.10.2.39 1. Compensation for the loss of the noctule and soprano bat roosts will be required. 2. We agree proposed works will require an EPS licence. 3. Component provisions of this section should also be included in the CEMP. 4. Management and monitoring prescriptions for replacement (compensation) bat roosts will be required.	1. The Applicant confirms that compensation of the noctule and soprano bat roosts will be provided through the NRW bat EPS mitigation licence. 2 – The Applicant welcomes NRW (A)'s response 3 – The Applicant does not intend to prepare a CEMP: mitigation measures relating to onshore ecology, including protected species, are set out in the Outline LEMP (J22 F03). A final LEMP will be in accordance with the Outline LEMP and will be agreed by the relevant authorities. 4 – The scope of management and monitoring will be determined as part of the NRW bat EPS mitigation licence application, and the final LEMP will be updated to reflect this.
REP3-090.287	Bats – Species Monitoring and Management 1.11.4.1 – 1.11.4.4 1. We agree with the annual post construction monitoring for bats for the initial five years. 2. We advise that periodic monitoring and bat box maintenance is carried out throughout the operation phase of the scheme where boxes are placed on land in the occupancy of the applicant or ecology body. 3. Owing to the current conservation status of noctule, we advise that monitoring of the compensation roost is carried out throughout the operational phase of the proposals	1 – The Applicant welcomes NRW (A)'s response. 2 – The Applicant has committed to a post-construction monitoring period of up to 30 years, and this will include monitoring of habitats and protected species in accordance with a detailed timetable to be agreed with the relevant authorities and included in the final LEMP. 3 – Section 1.11.4 of the Outline LEMP has been updated (J22 F03) to include reference to long-term monitoring of the noctule compensation roost.

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REP3-090.288	<p>Hazel dormouse: - Onshore Site Preparation and Construction 1.10.2.41 – 1.10.53</p> <ol style="list-style-type: none"> 1. Component provisions of this section should also be included in the CEMP. 2. We agree that proposed works are subject to EPS licence. 3. Management and monitoring prescriptions for dormouse compensation habitats will be required. 	<ol style="list-style-type: none"> 1. The Applicant does not intend to prepare a CEMP: mitigation measures relating to onshore ecology, including protected species, are set out in the Outline LEMP. A final LEMP will be in accordance with the Outline LEMP and will be agreed by the relevant authority. 2. The Applicant notes the response from NRW (A) The scope of management and monitoring will be determined as part of the NRW dormouse EPS mitigation licence application, and the final LEMP will be updated to reflect this.
REP3-090.289	<p>Hazel Dormouse: Species Monitoring and Management 1.11.5 – 1.11.5.4</p> <ol style="list-style-type: none"> 1. We note the monitoring and management prescriptions in respect of dormouse. 2. We welcome the inclusion of the statement confirming long term monitoring of hedgerows. We advise that this prescription includes long term dormouse surveillance. 	<ol style="list-style-type: none"> 1 – The Applicant notes the response from NRW (A) 2 – The scope of monitoring will be determined as part of the NRW dormouse EPS mitigation licence application, and the final LEMP will be updated to reflect this. The Applicant has committed to a post-construction monitoring period of up to 30-years, and this will include monitoring of habitats and protected species in accordance with a detailed timetable to be agreed with stakeholders and included in the final LEMP
REP3-090.290	<p>GCN: - Onshore Site Preparation and Construction 1.10.2.54 – 1.10.2.56</p> <ol style="list-style-type: none"> 1. Component provisions of this section should also be included in the CEMP. 2. We agree with the requirement for an EPS licence. 3. We note that further detail in respect of GCN is included in Appendix D of the LEMP. 	<ol style="list-style-type: none"> 1. The Applicant does not intend to prepare a CEMP: mitigation measures relating to onshore ecology, including protected species, are set out in the Outline LEMP. A final LEMP will be in accordance with the Outline LEMP and will be agreed by the relevant authority. 2. The Applicant notes the response from the NRW (A) The Applicant notes the response from the NRW (A)
REP3-090.291	<p>GCN Species Monitoring and Management 1.11.6 – 1.11.5.2</p> <ol style="list-style-type: none"> 1. We note more details concerning GCN Monitoring are listed in Appendix D. 2. Paragraph 1.11.6.2 states duration of post development monitoring. Annual monitoring using the methodology of the Wales GCN Monitoring Scheme will be required throughout the operational phase of the proposals 	<ol style="list-style-type: none"> 1 – The Applicant notes the response from the NRW (A) 2 – The Applicant considers that annual GCN monitoring for the duration of the operational period of the Mona Offshore Wind Project is excessive and would result in unnecessary disturbance to the pond habitats and breeding GCN. There will be a requirement for post-translocation GCN population monitoring for a defined period under the conditions of the NRW GCN licence, and this is typically for 10 years (which is the typical period for which an NRW licence is valid). This duration is what has been

Planning Inspectorate Ref. No.	NRW D3 Written Submission comment	Applicant's response
		assumed in the proposed GCN monitoring protocol in the Outline LEMP (J22 F03) (GCN population monitoring in Years 1, 2, 3, 4, 5, 7 and 10). Beyond the period covered by the EPS mitigation licence, the frequency of longer-term GCN monitoring can be agreed with the relevant authorities and included within the final LEMP, but a five-yearly cycle may be more appropriate.
REP3-090.292	Otter: - Onshore Site Preparation and Construction 1.10.2.64-1.10.2.68 1. We note submissions in respect of otter.	The Applicant notes the response from NRW (A)
REP3-090.293	Water Vole: - Onshore Site Preparation and Construction 1.10.2.69 – 1.10.2.71 1. We note proposals in respect of water vole. 2. Note, if disturbance is predicted when occupying a place of shelter (burrows) consideration must be given to potential licensing requirements	1. The Applicant notes the response from NRW (A) The Applicant notes the response from NRW (A). There is a commitment in the OLEMP (paragraph 1.10.2.70, J22 F03) to undertake licensed works as necessary if water voles are subsequently identified in pre-construction surveys.
REP3-090.294	Appendix B 1. We advise reference to The Amphibian Conservation Handbook and the Great Crested Newt Conservation Handbook	The Applicant notes the response from NRW (A) These documents will be reviewed as part of the detailed design of the GCN mitigation strategy that will form the EPS mitigation licence application to NRW, and the final LEMP will be updated to reflect the agreed mitigation strategy.
REP3-090.295	Appendix C 1. We advise consideration of biosecurity issues informs proposed planting schemes	The Applicant notes the response from NRW (A) and has made updates to section 1.7.6 of the Outline LEMP (J22 F03)
REP3-090.296	Appendix D – Outline Great Crested Newt Mitigation Strategy 1. We agree with the stated baseline summary in Section 1.2.7.1	The Applicant notes and welcomes NRW (A)'s response
REP3-090.297	Appendix D – Outline Great Crested Newt Mitigation Strategy 2. We note the component assessment of impacts. I agree with the conclusions in respect of 1.3.2 aquatic and 1.3.3 re terrestrial habitats	The Applicant notes and welcomes NRW (A)'s response

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REP3-090.298	<p>Appendix D – Outline Great Crested Newt Mitigation Strategy</p> <p>3. We note the observations concerning distances in 1.3.3.5. Please note that we consider dispersal ranges to be much larger. We therefore advise that this section is amended to include references to dispersal distances (1.6kms) cited in Section 6.2.3 of the Guidelines for the Selection of Biological SSSIs. Part 2: Chapter 18 Reptiles and Amphibians.</p>	<p>The Applicant notes that section 1.3.3.5 of the Outline LEMP (J22 F03) refers to the terrestrial habitats supporting GCN that are within the core (<50m), intermediate (50-100m) and distant (100-250m) terrestrial habitats for EPS mitigation licensing purposes. The quantum of pond and terrestrial habitat loss within these zones is set out in the Outline LEMP (J22 F03). NRW agreed with the Outline LEMP recommendations and proposed principles of mitigation (set out in paragraph 3.4.2.2 of RR-011) and was the key driver for establishing an appropriate GCN mitigation strategy to maintain the GCN population at favourable conservation status. It is acknowledged that dispersal distances may be greater, and this will be covered through the agreed EPS mitigation licensing approach, which will include all habitats within the Mona Onshore Development Area (although as stated in Appendix D Paragraph 1.4.1.2, a risk-based approach will be taken in terms of determining which habitats to be cleared are subject to trapping and translocation, and which are managed via RAMs).</p>
REP3-090.299	<p>Appendix D – Outline Great Crested Newt Mitigation Strategy</p> <p>4. We note the fencing specification cites the depth of the furrow trench as 200mm. We advise the minimum depth of the trench to be 300-350 mm.</p>	<p>Paragraph 1.4.3.8 of Appendix D of the Outline LEMP has been amended (J22 F03) to state a minimum trench depth of 300 – 350 mm.</p>
REP3-090.300	<p>Appendix D – Outline Great Crested Newt Mitigation Strategy</p> <p>5. We note and welcome proposed habitat creation and enhancement proposals in Section 1.5. We welcome the inclusion of habitat losses and gains tables.</p>	<p>The Applicant notes and welcomes NRW (A)'s response.</p>
REP3-090.301	<p>Appendix D – Outline Great Crested Newt Mitigation Strategy</p> <p>6. Biosecurity – We advise the inclusion of an additional provision concerning reviewing the need for aquatic planting schemes. This approach helps to minimize risks of invasive non-native plant species colonizing the site.</p>	<p>Section 1.6.3 of the GCN Mitigation Strategy Appendix D has been amended (J22 F03) to include provision for reviewing the need to bring plants into the site from commercial nurseries.</p>
REP3-090.302	<p>Appendix D – Outline Great Crested Newt Mitigation Strategy</p>	<p>As stated in the Applicant's response to REP3-080.291 above the Applicant considers that annual GCN monitoring for the entire operational period of the Proposed Development is excessive and would result in unnecessary disturbance to the pond habitats and breeding GCN. Beyond</p>

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	7. Monitoring during the Operational phase. We require annual surveillance throughout the operational phase of the proposals. Methodology to accord with and results reported through the Wales GCN Monitoring Scheme.	the period covered by the licence, the frequency of longer-term GCN monitoring can be agreed with the relevant authorities and included within the final LEMP, but a five-yearly cycle may be more appropriate.
REP3-090.303	Appendix D – Outline Great Crested Newt Mitigation Strategy 8. We welcome and support the proposal to transfer the occupancy of the GCN compensation area a body that accords with the definition of a “responsible” body under part 7 of the Environment Act 2021. We advise the proposed transfer be completed prior to the commencement of the operational phased of the proposals.	The Applicant notes and welcomes NRW (A)'s response
REP3-090.304	Appendix D – Outline Great Crested Newt Mitigation Strategy 9. No consideration appears to have been given to the issues and impacts caused by the installation of surface water gully pots and amphibians.	A section on operational drainage has been added to Appendix D of the Outline LEMP (J22 F03) to confirm that surface water drainage will include measures to avoid impacts on GCN (Section 1.4.7). This section also cross references to the information provided in the outline Operation Drainage Management Strategy (APP-231).
REP3-090.305	Appendix D – Outline Great Crested Newt Mitigation Strategy 10. We advise that subsequent revisions to the GCN Conservation strategy include (a) amphibian friendly surface water management systems, and (b) long term GCN surveillance proposals include any proposed SUDS ponds.	Please refer to the Applicant's response to REP3-090.304. The SUDS attenuation pond will be subject to GCN surveying as part of the post-translocation GCN monitoring if it is found to be holding water at the time of the surveys (and thus could support breeding GCN). An amendment has been made to Appendix D of the OLEMP to clarify that the SUDS attenuation pond will be included within the post-translocation GCN monitoring programme (J22 F03).
REP3-090.306	Appendix D – Outline Great Crested Newt Mitigation Strategy 11. Losses and gains will need to demonstrate cumulative implications on the impacts of the development together with the Bodelwyddan (Gwynt y Mor) GCN mitigation area.	The Applicant has taken this into account when designing the GCN mitigation strategy (see Appendix D paragraph 1.3.3.7 of the Outline LEMP J22 F03), the final details of which will be submitted with the GCN EPS mitigation Licence application to NRW, and the final LEMP updated accordingly.