

MONA OFFSHORE WIND PROJECT

Response to Bodorgan Marine Limited ISH4 Post Hearing Submission

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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.
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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Term	Meaning
	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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Term	Meaning
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 Bodorgan Marine Limited ISH4 Post Hearing Submission

1.1 Introduction

1.1.1.1 The Applicant has responded to Bodorgan Marine Limited's Deadline 4 submission below.

2 Responses to Bodorgan Marine Limited ISH4 Post Hearing Submission

Table 2.1: REP4-113 - Bodorgan Marine Limited

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP4-113.1	<p><u>Executive Summary</u></p> <p>1. The twin policy requirements for enhancement and optimisation of fisheries have not been dealt with adequately by the Applicant. This is evidenced by the fact that there is no substantial addressing of these twin policy requirements anywhere in the application documents.</p>	<p>The Applicant acknowledges the response and refers Bodorgan Marine Limited to its response in REP4-113.5 and REP4-113.6 below, where specific queries in relation to the policy requirements in question are addressed in detail.</p>
REP4-113.2	<p>As matters stand at present, we do not believe that the Secretary of State could lawfully discharge his Section 104 (2) (a) and (aa) Planning Act 2008 duties:</p> <p>104 [F1Decisions in cases where national policy statement has effect]</p> <p>(1) This section applies in relation to an application for an order granting development consent if [F2a national policy statement has effect in relation to development of the description to which the application relates].</p> <p>(2) In deciding the application the [F3Secretary of State] must have regard to—</p> <p>(a) any national policy statement which has effect in relation to development of the description to which the application relates (a “relevant national policy statement”),</p> <p>[F4(aa) the appropriate marine policy documents (if any), determined in accordance with section 59 of the Marine and Coastal Access Act 2009;]</p>	<p>The Applicant refers Bodorgan Marine Limited to its response in REP4-113.5 and REP4-113.6 below, where specific queries in relation to the policy requirements in question are addressed in detail.</p>
REP4-113.3	<p><u>The Twin Policy Requirements: enhancement and optimisation of fisheries</u></p> <p>At issue is whether the Applicant has recognised, understood and applied all of the relevant NSIP policy requirements.</p>	<p>The Applicant acknowledges the response and refers Bodorgan Marine Limited to its response in REP4-113.5 and REP4-113.6 below, where specific queries in relation to the policy requirements in question are addressed in detail.</p>
REP4-113.4	<p>Bodorgan Marine has a particular focus on 2 marine policy requirements. The first policy requirement, enhancement, deals with the narrow issue of the design of mitigation. The second is a broader policy requirement on all development in the Welsh marine space. This submission refers to these 2 policy requirements of enhancement and optimisation of fisheries as the Twin Policy Requirements.</p>	<p>The Applicant acknowledges the response and refers Bodorgan Marine Limited to its response in REP4-113.5 and REP4-113.6 below, where specific queries in relation to the policy requirements in question are addressed in detail.</p>

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<p>REP4-113.5</p>	<p>NPS EN3 paragraphs 2.8 250 and 251: in short, there is a policy requirement for the enhancement of fisheries to be the central part of the mitigation design process</p> <p><i>Commercial fisheries and fishing</i></p> <p>2.8.250 Any mitigation proposals should result from the applicant having detailed consultation with relevant representatives of the fishing industry, IFCA's, the MMO and the relevant Defra policy team in England and NRW and the relevant Welsh Government policy team in Wales.</p> <p>2.8.251 Mitigation should be designed to enhance, where reasonably possible, any potential medium and long-term positive benefits to the fishing industry, commercial fish stocks and the marine environment.</p>	<p>The Applicant acknowledges Bodorgan Marine Limited's response; however, it is important to emphasise that paragraphs 2.8.250 and 2.8.251 of the National Policy Statement (NPS) EN-3 are part of the broader context of mitigation policy outlined in the document. The Applicant emphasises that the Mona Offshore Wind Project has adhered to overarching mitigation policy obligations set out in paragraphs 2.8.213 to 2.8.217 of NPS EN-3. Detailed responses explaining how the Applicant has addressed the specific requirements outlined in paragraphs 2.8.250 and 2.8.251 of NPS-EN-3 have been provided below:</p> <p>Paragraph 2.8.250 of NPS EN-3</p> <p>The Applicant has complied with policy Paragraph 2.8.250 of NPS EN-3. Through the Applicant's consideration of effects on fish, the Applicant identified the need for mitigation. This mitigation was then developed in close consultation with relevant representatives of the fishing industry.</p> <p>The Applicant began engagement with key commercial fishing stakeholders identified by a regional Fishing Industry Representative (FIR) in June 2021. Consultation has been ongoing since 2021 as summarised in Table 6.5 of Volume 2, Chapter 6: Commercial fisheries (APP-058) and detailed in Appendix H of the Technical Engagement Plan Appendices - Part 2 (F to M) (APP-042). This has included post-EIA scoping discussions in Autumn 2022 on specific requirements to allow access to and continued fishing within Mona Array Area and Offshore Cable Corridor for the key existing fisheries in these areas, including UK and non-UK vessels targeting queen scallops and static gear (potting) vessels. This engagement considered the need for avoidance of infrastructure over core queen scallop grounds, sufficient spacing between infrastructure to allow continued access and fishing, orientation of wind turbines with dominant towing directions, burying of cables and minimising the use of cable protection. In Winter 2022, further engagement was undertaken specifically with scallop fishing stakeholders on the potential for a Scallop Mitigation Zone (SMZ). The commitment to a SMZ was subsequently included in the Outline Fisheries Liaison and Co-existence Plan (OFLCP) (REP3-016). Further, the Applicant has consulted with the Welsh Government Marine and Fisheries Division, the Welsh Fishermen's Association (WFA) and individuals associated with the Menai Strait Fishing Order Management Association and Menai West Fishery Orders Applicants.</p> <p>The Applicant notes that Bodorgan Marine Limited did not submit a response to the Mona Offshore Wind Project statutory consultation in June 2023.</p> <p>Paragraph 2.8.251 of NPS EN-3</p> <p>In response to the policy outlined in NPS EN-3 paragraph 2.8.251 set out below:</p> <p><i>Mitigation should be designed to enhance, where reasonably possible, any potential medium and long-term positive benefits to the fishing industry, commercial fish stocks and the marine environment.</i>, the Applicant acknowledges the policy aim of enhancement of commercial fisheries in the mitigation design process. However, the phrase "<i>where reasonably possible</i>" recognises that achieving such enhancements may encounter practical limitations. This ensures that, while the enhancement of fisheries should be considered, it should be balanced with the feasibility of implementation within the context of specific project and environmental conditions. In the context of the aquaculture industry specifically, during the Environmental Impact Assessment (EIA) process undertaken for the Mona Offshore Wind Project, the Applicant did not identify existing aquaculture operations that overlapped with the Mona Array Area and Offshore Cable Corridor Order Limits (as shown on Figure 1.6 of Volume 5, Annex 5.1: Cumulative effects screening matrix (REP3-008)), and which could therefore benefit from mitigation or enhancement specific to the aquaculture industry (as detailed in the Applicant's response to Bodorgan Marine Limited's Written Representation (REP2-078, paragraph REP1-062.5). As detailed above in response to Paragraph 2.8.250 of NPS EN-3, due to the importance of parts of the Mona Array Area and Offshore Cable Corridor to queen scallop vessels, discussions regarding mitigation have been focussed on this fishery. Similar discussions have also been held with respect to other commercial fisheries receptor groups active in this area, including static gear (potting) vessels.</p> <p>While discussions regarding mitigation have been focussed on these fisheries, the Applicant has made significant commitments to all commercial fisheries receptor groups in the design of the project to facilitate co-existence and co-location and to enable continued fishing activity within the Mona Array Area and Offshore Export Cable Corridor. The Applicant refers Bodorgan Marine Limited to Table 1.2 within the revised Deadline 3 submission of the OFLCP (REP3-016) for more details.</p> <p>The Applicant acknowledges that the nature of the development presents limited opportunities for enhancement. However, the Applicant is considering potential opportunities for intertidal and offshore biodiversity enhancement, which have the potential to benefit fish and shellfish ecology receptors (see section 3.6 of the Biodiversity Benefit and Green Infrastructure Statement (APP-193) and HAP_ISH4_1 of the Applicant's response October Hearing Action Points (REP4-036)).</p>
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Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
		<p>For the reasons set out above, the Applicant considers that it has satisfied the policy set out in NPS EN-3 by ensuring that reasonable opportunities for enhancement have been explored whilst having due regard to practical constraints.</p>
<p>REP4-113.6</p>	<p>Policy ECON 02 of the 2019 Welsh Marine Plan: in short, there is a policy a requirement for all proposals in the Welsh Marine Space to seek to optimize the value and use of marine resources through co-existence.</p> <p>Policy</p> <p>ECON_02: Coexistence Proposals should demonstrate how they have considered opportunities for coexistence with other compatible sectors in order to optimise the value and use of the marine area and marine natural resources.</p> <p>Policy Aim</p> <p>103. This Plan supports coexistence of relevant activities and uses by encouraging proposals to consider opportunities to bring together differing but compatible activities to make the best possible use of marine space and natural resources.</p> <p>104. Under Policy ECON_02, proposals should set out how potential opportunities for coexistence with other activities have been assessed and how realising these opportunities could optimise the value and sustainable use of the Plan area. Proposals should demonstrate the extent to which they will coexist with other activities and how this will be achieved. Consideration should also be given to the coexistence of activities and developments in adjacent marine planning areas and at the land-sea interface in order to optimise the value and sustainable use of wider resources. It is recognised projects may not be able to identify realistic coexistence opportunities.</p>	<p>The Applicant recognises policy ECON_02: Co-existence of the 2019 Welsh National Marine Plan (WNMP), which states that proposals should explore opportunities for co-existence with other compatible sectors in order to optimise the value and use of the marine area and natural resources. The Applicant has made significant commitments in the design of the project to facilitate co-existence with existing commercial fisheries and allow for continued fishing activity within the Mona Array Area and Offshore Export Cable Corridor. These commitments are secured in the OFLCP (REP3-016) with the requirement for the Final Fisheries Liaison and Co-existence Plan (which must accord with the commitments in the OFLCP (REP3-016)), secured within the deemed marine licence under Schedule 14 of the draft Development Consent Order (DCO) (C1 F06) and expected to be secured within the standalone Natural Resources Wales (NRW) marine licence.</p> <p>The Applicant references paragraph 104 of ECON_02: Co-existence, which acknowledges that <i>“it is recognised projects may not be able to identify realistic co-existence opportunities”</i>. As outlined in the Applicant's response to REP4-113.5 above, the EIA conducted for the Mona Offshore Wind Project did not identify any aquaculture operations within the Mona Array Area or the Offshore Export Cable Corridor Order Limits (as illustrated in Figure 1.6 of Volume 5, Annex 5.1: Cumulative effects screening matrix (REP3-008)), and which could therefore benefit from co-existence. Consequently, the Applicant's mitigation efforts related to co-existence have primarily focused on existing commercial fishing activities, with particular attention to the scallop fishery.</p> <p>The Applicant refers Bodorgan Marine Limited to paragraph 3.6.3.1 of the Applicant's Biodiversity Benefit and Green Infrastructure Statement (APP-193), which outlines the Applicant's intention to explore opportunities to restore fish and shellfish habitats in the offshore environment as part of intertidal and offshore benefits, as well as a number of other proposed measures.</p> <p>To conclude, the Applicant has demonstrated compliance with policy ECON_02 of the 2019 WNMP by actively exploring realistic opportunities for co-existence and incorporating significant design commitments to facilitate such arrangements. The commitments include provisions for continued commercial fishing activity (as detailed in the OFLCP (REP3-016)), ensuring that co-existence objectives are met. Furthermore, the absence of aquaculture operations within the Mona Array Area and Offshore Export Cable Corridor, as identified through the EIA, confirms that the Applicant has appropriately tailored mitigation efforts to address existing commercial fisheries, particularly the scallop fishery. These actions collectively align with the policy's aim to consider co-existence with compatible sectors in order to optimise the value and use of marine resources, while acknowledging practical limitations of co-existence opportunities, as highlighted in paragraph 104 of ECON_02.</p>
<p>REP4-113.7</p>	<p><u>Examination of how the Applicant has addressed the Twin Policy Requirements: the Outline Fisheries Liaison and Co-Existence Plan</u></p> <p>There is no mention of the Twin Policy Requirements in the OFLCEP; see para 1.1.4.</p> <p>1.1.4 Guidance and legislation</p> <p>1.1.4.1 This Outline FLCP has been developed with reference to the following key legislation and guidance documentation:</p> <ul style="list-style-type: none"> • Fisheries Act 2020 – Joint Fisheries Statement: Displacement Policy • Fishing Liaison with Offshore Wind and Wet Renewables Group (FLOWW) Best Practice Guidance for Offshore Renewables Developments. Recommendations for Fisheries Liaison (FLOWW, 2014)¹ • FLOWW Best Practice Guidance for Offshore Renewables Developments: Recommendations for Fisheries Disruption Settlements and Community Funds (FLOWW, 2015) • Marine Scotland Guidance on preparing a Fisheries Management and Mitigation Strategy – Draft (Marine Scotland, 2020) • Seafood/Offshore Renewable Energy (ORE) Engagement in Ireland - A Summary Guide (Department of Housing, Local Government and Heritage, 2023) • International maritime regulations as adopted by the relevant flag state such as International Regulations for Preventing Collisions at Sea (COLREGS) (IMO, 1972/77) and Safety of Life at Sea Convention (SOLAS) (IMO, 1974). 	<p>The acknowledgment of policy requirements in regard to NPS EN-3 paragraphs 2.8.250 and 2.8.251 within the Mona Offshore Wind Farm application can be found in Table 6.2 Volume 2, Chapter 6: Commercial fisheries (APP-058) and is expanded upon in context of the aquaculture industry in the Applicant's response to REP4-113.5 above.</p> <p>The acknowledgment of policy ECON_02: Co-existence within the Mona Offshore Wind Farm application can be found in Table 6.3 Volume 2, Chapter 6: Commercial fisheries (APP-058) and is expanded upon in context of the aquaculture industry in the Applicant's response to REP4-113.6 above.</p>

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response				
REP4-113.8	<p><u>Examination of how the Applicant has addressed the Twin Policy requirements: The Environmental Statement: Volume 2 Chapter 6 on Commercial Fisheries</u></p> <p>Volume 2 Chapter 6 deals with commercial fisheries.</p>	<p>The Applicant acknowledges the response and refers Bodorgan Marine Limited to its response in REP4-113.7 above.</p>				
REP4-113.9	<p><u>NPS EN3</u></p> <p>The policy of requirements NPS EN 3 paragraphs 250 and 251 are referred to at Table 6.2 in the section which deals with policy.</p> <table border="1" data-bbox="359 531 1576 930"> <tr> <td data-bbox="359 531 834 762"> <p>Any mitigation proposals should result from the applicant having detailed consultation with relevant representatives of the fishing industry, IFCA's, the MMO and the relevant Defra policy team in England and NRW and the relevant Welsh Government policy team in Wales. (paragraph 2.8.250 of NPS EN-3)</p> </td> <td data-bbox="842 531 1576 762"> <p>been included in the Application (Document Reference: J10). Consultation is an important aspect of the assessment of potential impacts on commercial fisheries for the Mona Offshore Wind Project and any related mitigation. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project (see section 6.3). A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application (Document Reference: J10).</p> </td> </tr> <tr> <td data-bbox="359 768 834 930"> <p>Mitigation should be designed to enhance where reasonably possible any potential medium and long-term positive benefits to the fishing industry and commercial fish stocks and the marine environment. (paragraph 2.8.251 of NPS EN-3)</p> </td> <td data-bbox="842 768 1576 930"> <p>Mitigation measures are presented in section 6.7.</p> </td> </tr> </table>	<p>Any mitigation proposals should result from the applicant having detailed consultation with relevant representatives of the fishing industry, IFCA's, the MMO and the relevant Defra policy team in England and NRW and the relevant Welsh Government policy team in Wales. (paragraph 2.8.250 of NPS EN-3)</p>	<p>been included in the Application (Document Reference: J10). Consultation is an important aspect of the assessment of potential impacts on commercial fisheries for the Mona Offshore Wind Project and any related mitigation. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project (see section 6.3). A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application (Document Reference: J10).</p>	<p>Mitigation should be designed to enhance where reasonably possible any potential medium and long-term positive benefits to the fishing industry and commercial fish stocks and the marine environment. (paragraph 2.8.251 of NPS EN-3)</p>	<p>Mitigation measures are presented in section 6.7.</p>	<p>The Applicant acknowledges the response and refers Bodorgan Marine Limited to its response in REP4-113.7 above.</p>
<p>Any mitigation proposals should result from the applicant having detailed consultation with relevant representatives of the fishing industry, IFCA's, the MMO and the relevant Defra policy team in England and NRW and the relevant Welsh Government policy team in Wales. (paragraph 2.8.250 of NPS EN-3)</p>	<p>been included in the Application (Document Reference: J10). Consultation is an important aspect of the assessment of potential impacts on commercial fisheries for the Mona Offshore Wind Project and any related mitigation. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project (see section 6.3). A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the Application (Document Reference: J10).</p>					
<p>Mitigation should be designed to enhance where reasonably possible any potential medium and long-term positive benefits to the fishing industry and commercial fish stocks and the marine environment. (paragraph 2.8.251 of NPS EN-3)</p>	<p>Mitigation measures are presented in section 6.7.</p>					
REP4-113.10	<p>The substance of the Applicant's mitigation approach is set out in Section 6.7 which deals with 'Measures' at pages 63-66.</p>	<p>The Applicant's significant commitments are secured in the OFLCP (REP3-016) with the requirement for the Final Fisheries Liaison and Co-existence Plan (which must accord with the commitments in the OFLCP (REP3-016)), secured within the deemed marine licence under Schedule 14 of the draft DCO (C1 F06) and expected to be secured within the standalone NRW marine licence.</p>				
REP4-113.11	<p>The focus of the Measures appears to be on the reduction of impact. There is nothing on the enhancement of fisheries: see 6.7.1.2.</p> <p>6.7.1.2 A number of measures (primary and tertiary) have been adopted as part of the Mona Offshore Wind Project to reduce the potential for impacts on commercial fisheries (see Table 6.15).</p>	<p>The Applicant acknowledges the response and refers Bodorgan Marine Limited to its response in REP4-113.5 and REP4-113.6 above.</p>				
REP4-113.12	<p><u>The Welsh Marine Plan</u></p> <p>The 2019 Welsh Marine Plan requirements are dealt with at paragraph 6.2.2 and following as follows and by reference to other chapters of the Environmental Statement:</p> <table border="1" data-bbox="359 1392 1576 1612"> <tr> <td data-bbox="359 1392 647 1612"> <p>ECON_02: Co-existence</p> </td> <td data-bbox="655 1392 928 1612"> <p>Proposals should demonstrate how they have considered opportunities for co-existence with other compatible sectors in order to optimize the value and use of the marine area and marine natural resources.</p> </td> <td data-bbox="937 1392 1576 1612"> <p>Co-existence impacts are assessed in Volume 4, Chapter 3: Socio-economics, and community in Volume 2, Chapter 11: Inter-related effects (offshore) of the Environmental Statement.</p> </td> </tr> </table>	<p>ECON_02: Co-existence</p>	<p>Proposals should demonstrate how they have considered opportunities for co-existence with other compatible sectors in order to optimize the value and use of the marine area and marine natural resources.</p>	<p>Co-existence impacts are assessed in Volume 4, Chapter 3: Socio-economics, and community in Volume 2, Chapter 11: Inter-related effects (offshore) of the Environmental Statement.</p>	<p>The Applicant acknowledges the response and refers Bodorgan Marine Limited to its response in REP4-113.6 above, where the WNMP policy ECON_02: Co-existence is discussed in detail.</p>	
<p>ECON_02: Co-existence</p>	<p>Proposals should demonstrate how they have considered opportunities for co-existence with other compatible sectors in order to optimize the value and use of the marine area and marine natural resources.</p>	<p>Co-existence impacts are assessed in Volume 4, Chapter 3: Socio-economics, and community in Volume 2, Chapter 11: Inter-related effects (offshore) of the Environmental Statement.</p>				
REP4-113.13	<p><u>Examination of how the Applicant has addressed the policy requirements of the Welsh Marine Plans: Volume 4, Chapter 3 on socio-economic matters</u></p> <p>We cannot see anything on enhancement or optimisation of fisheries in Volume 4, Chapter 3.</p>	<p>The Applicant acknowledges the response and refers Bodorgan Marine Limited to its response in REP4-113.5 and REP4-113.6 above.</p>				

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP4-113.14	<p><u>Examination of how the Applicant has addressed the policy requirements of the Welsh Marine Plan: Volume 2, Chapter 11 on Inter-related Effects</u></p> <p>At 11.6.4: there is nothing on enhancement or optimisation of fisheries.</p> <p>11.6.4 Human environment</p> <p><u>Commercial fisheries</u></p> <p>11.6.4.1 For commercial fisheries, the following potential impacts have been considered within the inter-related assessment:</p> <ul style="list-style-type: none"> • Loss or restricted access to fishing grounds • Displacement of fishing activity into other areas • Interference with fishing activity • Loss or damage to fishing gear due to snagging • Potential impacts on commercially important fish and shellfish resources • Supply chain opportunities for local fishing vessels • Potential impacts on commercial fisheries as a result of increased risk of introduction and spread of INNS. 	<p>The Applicant acknowledges the response and refers Bodorgan Marine Limited to its response in REP4-113.7 above.</p>
REP4-113.15	<p><u>Other comments: co-location and co-existence</u></p> <p>The Applicant has appeared to conflate co-existence and co-location.</p>	<p>The Applicant acknowledges the response and refers Bodorgan Marine Limited to its response in REP4-113.16 below.</p>
REP4-113.16	<p>The definitions of co-location and co-existence for present purposes are set out in the 2019 Welsh Marine Plan at paragraph 98 which immediately precedes policy ECON 02.</p> <p>Supporting coexistence</p> <p>98. Coexistence is where multiple developments, activities or uses can exist alongside or close to each other in the same place and/or at the same time. Coexistence is already common in the marine environment. Co-location is a subset of coexistence and is where multiple developments, activities or uses coexist in the same place by sharing the same footprint or area.</p>	<p>The Applicant acknowledges the response and notes that this query was raised by Bodorgan Marine Limited in REP1-062.2 and REP1-062.3 of Bodorgan Marine Limited's Written Representation (REP1-062), and RR-006.1 of the Applicant's Response to Relevant Representations (PDA-008), to which the Applicant has responded and refers Bodorgan Marine Limited for further details.</p>
REP4-113.17	<p>Paragraphs 98-102 examine and provide policy support for co-existence</p>	<p>The Applicant acknowledges the response and refers Bodorgan Marine Limited to its response in REP4-113.6 above, where the WNMP policy ECON_02: Co-existence is discussed in detail.</p>
REP4-113.18	<p>The 2020 CEFAS Report on Co-existence takes this examination further and identifies off-shore aquaculture as the optimal form of co-location with offshore wind.</p>	<p>The Applicant acknowledges the response and notes that this query was raised by Bodorgan Marine Limited in RR-006.1 of the Applicant's Response to Relevant Representations (PDA-008), to which the Applicant has responded and refers Bodorgan Marine Limited for further details.</p>
REP4-113.19	<p><u>Other comments: the Applicant's response at Outline Hearing 4</u></p> <p>After Bodorgan Marine had made its submission at Outline Hearing 4, the Applicant's representative stated that this was the first time the Applicant had heard the issues raised by Bodorgan Marine. While that statement might have been correct in a narrow sense as that Hearing was the first occasion on which Bodorgan Marine have spoken, Bodorgan Marine have been making representations to similar effect consistently since May 2024.</p>	<p>The Applicant's statement at Issue Specific Hearing 4 referenced Bodorgan Marine Limited's comments regarding enhancement and optimisation under paragraphs 2.8.250 and 2.8.251 of NPS EN-3 and the WNMP policy ECON_02. While Bodorgan Marine Limited has been actively engaging since May 2024, the Applicant's comment referred specifically to these recent, distinct points, which had not been raised in earlier submissions or representations from Bodorgan Marine.</p>
REP4-113.20	<p>The Applicant made reference to the fact that it was proposing by way of biodiversity mitigation to enhance shell fish. We have not yet managed to find the relevant passage in the application documents and consequently are not able in this representation to comment on the extent to which this proposal contributes to the discharge of the Applicant's obligations.</p>	<p>The Applicant refers Bodorgan Marine Limited to paragraph 3.6.3.1 of the Applicant's Biodiversity Benefit and Green Infrastructure Statement (APP-193), which outlines its intention to explore opportunities to restore fish and shellfish habitats in the offshore environment as part of intertidal and offshore benefits, as well as a number of other proposed measures.</p>