Inverdee House, Baxter Street,
Aberdeen, AB11 9QA, United Kingdom

Email: OIA@jncc.gov.uk
Tel: +44 (0) 1224 266550
jncc.gov.uk

Application by Mona Offshore Wind Limited for an Order Granting Development Consent for the Mona Offshore Wind Farm (Ref. EN01037)

Submission for Examination

Deadline 5

3 December 2024

Joint Nature Conservation Committee (JNCC):

Outstanding concerns for the offshore benthic environment

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In order to stream-line outstanding responses and comments from multiple previous submissions, JNCC have decided to submit one response for offshore benthic issues that details our outstanding concerns and addresses recent comments and suggested changes from the Applicant. This response details our concerns around:

1. Marine decommissioning
2. Assessing impacts to 'seapen and burrowing megafauna communities' Important Ecological Features (IEF)
3. Maximum Design Scenario
4. Sandwave clearance

1 Marine decommissioning

The below response on marine decommissioning relates to submissions from:

- The Applicant's Deadline 3 submission 'Response to JNCC D2 Submission' document (REP3-036; responses REP2-097.68, REP2-097.69, REP2-097.75, REP2-097.78, and REP2-097.80)
- The Applicant's Deadline 4 submission 'Response to Joint Nature Conservation Committee Deadline 3 Submission' (REP4-048; responses REP3-086.85, REP3-086.86, REP3-086.87, REP3-086.94, REP3-086.95, REP3-086.98, and REP3-086.101)

Decommissioning activities have not been fully considered. The recently published guidelines by Offshore Energies UK (OEUK) for 'Designing for Decommissioning of Offshore Wind' states that:

> "*Assets should be designed to be decommissioned with a technology available at the time of commissioning*"

The Examining Authority for Five Estuaries Offshore Wind Farm Limited (project EN010115) has requested from the Applicant that:

> "*Decommissioning is required to be assessed in order that the Examining Authority (ExA) and Secretary of State can have regard to the likely significant effects of the whole project over its lifecycle in making a recommendation and determination.*"

This can be achieved by following the OEUK 'Designing for Decommissioning of Offshore Wind' guidelines and assessing decommissioning based on available technologies now and not in the future. JNCC consider that without assessing decommissioning now, it is not possible to determine the likely significant effects of the project as a whole for the offshore environment.

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2 Assessing impacts to 'seapen and burrowing megafauna communities' Important Ecological Features (IEF)'

2.1 Magnitude of effect

The below response on magnitude of effect relates to submissions from:

- The Applicant's Deadline 3 submission 'Response to JNCC D2 Submission' document (REP3-036; responses REP2-097.67, REP2-097.83)
- The Applicant's Deadline 4 submission, 'Hearing Summary (ISH4) Offshore Matters' (REP4-034; ID 3c)
- The Applicant's Deadline 4 submission, 'Response to October Hearing Action Points' (REP4-036; reference HAP_ISH4_05)
- The Applicant's Deadline 4 submission 'Response to Joint Nature Conservation Committee Deadline 3 Submission' (REP4-048; responses REP3-086.84, REP3-086.104)
- The Applicant's Deadline 4 submission, 'Response to JNCC ExQ1 Responses' (REP4-062; reference REP3-084.5)

JNCC welcomes the approach detailed in the Applicant's Deadline 4 submission, 'Response to JNCC ExQ1 Responses' (REP4-062; reference REP3-084.5), to combine the long-term habitat loss and temporary habitat loss/disturbance areas as a more realistic assessment in terms of geographic scale for the 'seapen and burrowing megafauna communities' IEF. We would welcome this addition of 13.86% of impacted area within the final version of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), to ensure transparency as well as ease of access and reduced confusion for future projects referring to this Application. JNCC would agree with the Applicant's assessment of low magnitude of impact for this updated impact area.

2.2 Sensitivity of the 'seapen and burrowing megafauna communities' IEF

The below response on sensitivity of the 'seapen and burrowing megafauna communities' IEF relates to submissions from:

- The Applicant's Deadline 3 submission 'Response to JNCC D2 Submission' document (REP3-036; responses REP2-097.66, REP2-097.81)
- The Applicant's Deadline 4 submission 'Response to Joint Nature Conservation Committee Deadline 3 Submission' (REP4-048; responses REP3-086.84, REP3-086.102)

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- The Applicant's Deadline 4 submission, 'Response to JNCC ExQ1 Responses' (REP4-062; reference REP3-084.5)

JNCC do not consider the MarESA sensitivities as a guide to "tailoring" the sensitivities of identified habitats. MarESA provides peer-reviewed sensitivities based on comprehensive and rigorous reviews of habitat-specific sensitivities and pressures from the scientific literature. JNCC would not expect to see changes made to the sensitivities reported by MarESA. JNCC, therefore welcomes the Applicant's correction of the MarESA sensitivity to 'High', as detailed in REP4-062 (reference REP3-084.5), and would expect to see this corrected sensitivity reflected throughout the final documentation, including Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054).

JNCC takes a worst-case scenario approach and where a range is presented, we would expect to see the higher value considered. JNCC acknowledges that there has been a lack of seapens identified from surveys carried out to date. However, the Applicant has stated, as a precaution, that the 'seapen and burrowing megafauna communities' IEF is present. Therefore, it is appropriate that this habitat is assessed fully and would justify assessing the significance of effect as 'moderate' when a range is given as 'minor to moderate', as previously detailed by JNCC's Deadline 2 submission (REP3-036, response REP2-097.66). JNCC therefore does not agree with the Applicant's conclusion of a minor significance of effect, as detailed in the Applicant's Deadline 4 submission, 'Response to JNCC ExQ1 Responses' (REP4-062; reference REP3-084.5), and would consider the significance of effect to be 'moderate' for the 'seapen and burrowing megafauna communities' IEF.

3 Maximum Design Scenario

The below response on the maximum design scenario relates to submissions from:

- The Applicant's Deadline 3 submission 'Response to JNCC D2 Submission' (REP3-036; response REP2-097.72 and REP2-097.77)
- The Applicant's Deadline 4 submission 'Response to Joint Nature Conservation Committee Deadline 3 Submission' (REP4-048; responses REP3-086.90, REP3-086.91, REP3-086.96)

In the Applicant's Deadline 3 submission 'Response to JNCC D2 Submission' (REP3-036; response REP2-097.72), the Applicant provided an explanation to the Maximum Design Scenario including a table detailing Option 1 and Option 2 for suction bucket 4-legged jacket foundations. JNCC found this to be very useful and clear, providing much needed

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transparency in the Applicant's calculations of the maximum design scenario, however, further clarity is still required. Without this level of detail, breakdown of figures and accurate calculations within the final documentation, it is not possible to check whether the Applicant has calculated the total seabed footprint for the Mona Offshore Wind Project correctly or not. To emphasise this point, we note that, despite the breakdown of figures provided in the table, the total seabed footprint for the Mona Offshore Wind Project for Option 1 listed within this example table seems to be incorrect and JNCC believe that the value should be 591,552m^2. This highlights the need for the Applicant to provide more transparency in their calculations of the maximum design scenario to allow for increased confidence in subsequent environmental assessments and impacts. JNCC would therefore request that similar tables are provided and incorporated into the final documentation, including Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), for all foundation types (see our original comment for which tables this would apply to; REP3-036, response REP2-097.72, REP2-097.77 and REP4-048, responses REP3-086.90, REP3-086.96) so we can be confident that the values which the Applicant is quoting are correct. Similarly, and with regards the maximum design scenario for Offshore Substation Platform (OSP) foundation sizes (as commented on in REP3-036; response REP2-097.77), JNCC would like to see these as updated table information within the final documentation, including Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), to allow for complete transparency.

4 Sandwave clearance

The below response on offshore (past 12nm) sandwave clearance relates to submissions from:

- The Applicant's Deadline 3 submission 'Response to JNCC D2 Submission' document (REP3-036; response REP2-097.65)
- The Applicant's Deadline 4 submission 'Response to Joint Nature Conservation Committee Deadline 3 Submission' (REP4-048; response REP3-086.85)

In the Applicant's Deadline 3 submission 'Response to JNCC D2 Submission' document (REP3-036; response REP2-097.65), the Applicant provided an indicative estimation to the quantity of sandwave clearance that may occur in the offshore marine environment (beyond 12nm). JNCC are content with these indicative values estimated at approximately 4,838,400m^2. This is also linked with the Applicant's Deadline 4 submission 'Response to Joint Nature Conservation Committee Deadline 3 Submission' (REP4-048; response REP3-086.85). JNCC consider this matter to be resolved.

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5 References

Offshore Energies UK (OEUK) (2024); Designing for decommissioning of offshore wind – Guidelines. Published by OEUK, ISBN: 978-1-913078-54-6. 59pp.