

MONA OFFSHORE WIND PROJECT

Response to JNCC ExQ2 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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	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
AEol	Adverse Effect on Integrity
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

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Acronym	Description
TWT	The Wildlife Trusts

Units

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

1 Response to JNCC ExQ2 submission

1.1 Introduction

1.1.1.1 The Applicant has responded to the JNCC's ExQ2 submission below.

2 Response to JNCC ExQ2 Submission

Table 2.1: REP5-097 - JNCC

Planning Inspectorate to Ref. No.	Question	ExQ2 Question	JNCC Response	Applicant's response
REP5-097.1	The Applicant NRW A JNCC	<p>Q2.17.5 Water depth</p> <p>The Mitigation and Monitoring Schedule [REP4-013] reference no 8 notes that if the water depth is reduced by more than 5% written approval from the Licensing Authority in consultation with the Maritime and Coastguard Agency (MCA) would be sought.</p> <p>Can you summarise what approach would be taken regarding benthic subtidal and intertidal ecology assessment of effects including any necessary approval from SNCBs if water depth is reduced by more than 5%?</p>	JNCC does not consider this to be an issue for the marine offshore environment (past 12nm). For the marine inshore environment (within 12nm) we would defer to Natural Resources Wales Advisory (NRW (A)).	The Applicant notes that this is outside the Joint Nature Conservation Committee (JNCC)'s remit.
REP5-097.2	NRW A JNCC	<p>Q2.17.9 Mitigation and monitoring measures</p> <p>Can you confirm if you are satisfied with the benthic subtidal and intertidal ecology mitigation measures being put forward by the Applicant, and provide a summary of reasons if you disagree with the statement <i>that "no benthic subtidal and intertidal ecology monitoring to test the predictions made within the impact assessment is considered necessary.</i></p>	JNCC are satisfied with the benthic subtidal and intertidal ecology mitigation measures for the marine offshore environment (past 12nm). For the marine inshore environment (within 12nm) we would defer to NRW (A).	The Applicant welcomes the confirmation from the JNCC that they are satisfied with the mitigation measures proposed for the marine offshore environment (past 12 nm).
REP5-097.3	The Applicant JNCC NRW A	<p>Q2.17.12 UXO Clearance</p> <p>In order to mitigate the potential likelihood of injury from UXO clearance the Proposed Development key measures consists of an UXO staged mitigation hierarchy (avoid, low charge, high charge) an Outline MMMP [APP-</p>	JNCC previously responded to a proposal put forward by the Examining Authority (REP3-084), who suggested two options for including Unexploded Ordnance (UXO) clearance in the DCO:	The Applicant welcomes and agrees with JNCC's view that this is not a derogation issue and notes the JNCC's Response to the Report on the Implication for European Sites (RIES) (REP5-095), which states that subject to updates being made to the Outline MMMP

Planning Inspectorate to Ref. No.	Question	ExQ2 Question	JNCC Response	Applicant's response
		<p>207], an Outline underwater sound management strategy [APP-202] and conditions 20 and 21 (schedule 14) of the deemed marine licence [REP2-004]. Can you summarise what further data, assessment and measures would be required for a separate marine licence application (to facilitate high order clearance charges) and the expected timeframe required for a separate marine licence application and decision.</p>	<p>I. That UXO clearance is not included in the DCO.</p> <p>II. That UXO clearance could be included within the DCO if high order clearance was removed from the clearance options.</p> <p>JNCC's preference was for option (i) but conceded that option (ii) would be acceptable. However, the applicant did not agree with either of these approaches and submitted the further information (REP4-086) in defence of their approach at Deadline 4. JNCC has considered this matter further and held discussions with other signatories of the Government's Joint Position Statement on UXO clearance. We maintain our opinion that UXO clearance should not be included in the DCO/dML as a licensed activity.</p> <p>Further information supporting our advice is provided in JNCC's Deadline 5 submission titled, 'JNCC response to Applicants UXO clearance position statement'. In this we provide details of an update to the Government's Joint Position Statement on UXO clearance, which is going through the final stages of sign-off and is anticipated to be published before this examination process is completed. The updated statement sets out the current shared position of all relevant government departments, regulators, and Statutory Nature Conservation Bodies (SNCBs) regarding UXO clearance. We appreciate</p>	<p>(REP5-032) and Outline UWSMS (REP5-028) which the Applicant confirms were submitted at Deadline 5, "JNCC agrees that AEoI can be excluded for all offshore harbour porpoise sites in relation to all impacts, both alone and in-combination". This agreement is reflected in the updated Mona and JNCC SoCG (S_D1_15 F02) submitted at Deadline 6 (see row JNCC.MM.32 and JNCC.MM.33).</p> <p>The Applicant has reviewed its position on the inclusion of high order UXO clearance in the Draft DCO in light of JNCC's concerns and has committed at Deadline 5 to the use of low order clearance only. High order UXO clearance will not be authorised under the DCO or the NRW Marine Licence (ML). This is reflected in the updated drafting of the deemed marine licence in Schedule 14, Condition 21 in the Draft DCO made at Deadline 5 (REP5-006), and for clarity, the Marine Licence Principles Document (REP5-022) has been updated to remove high order UXO clearance from the NRW marine licence application. This commitment has been included in reference numbers 33 and 111 of the Mitigation and Monitoring Schedule (J10 F06) and is reflected in the Outline MMMP (REP5-032) and Outline UWSMS (REP5-028). The Applicant confirms that should high order clearance be required, this will be subject to a separate NRW marine licence application.</p> <p>The Applicant's position now aligns with option (ii) presented by the Examining Authority (ExA) in Q1.17.9 (PD-013) and is considered acceptable by the JNCC. The Applicant has sought to engage with the JNCC to confirm</p>

Planning Inspectorate to Ref. No.	Question	ExQ2 Question	JNCC Response	Applicant's response
			<p>the applicant has not had sight of this new statement yet, but given the importance of this topic, we provide details of what is included to support this examination process.</p> <p>The document 'JNCC response to Applicants UXO clearance position statement' details guidance provided in the Government's updated statement on what information should be provided to support marine licence applications for UXO clearance. This level of detail is not currently available nor is it appropriate or practical to undertake the required surveys at this stage of the development as they would need to be repeated ahead of clearance commencing. As a result, we maintain our position that UXO clearance should not be included in the DCO/dML.</p> <p>While we consider this a material consideration for the DCO, we do not see this as a derogation issue. Rather, it is not appropriate to consider UXO clearance at this time and a separate licence should be applied for when the required information is available.</p> <p>We would be accepting of including the investigative surveys to confirm UXOs in the DCO. JNCC is not able to comment on expected timeframes for determination of separate marine licenses. However, including the investigative surveys in the DCO would enable these to be conducted before applying for any subsequent marine licence, thus maximising the available information to support that application and</p>	<p>whether they consider this commitment and mitigation for low order UXO clearance to be appropriately secured within the draft DCO (C1 F07) – an update on this matter is provided in the updated Mona and JNCC SoCG (S_D1_15 F02) submitted at Deadline 6 (see rows JNCC.MM.9, JNCC.MM.17, JNCC.MM.19, JNCC.MM.31).</p> <p>The Applicant welcomes the preliminary information provided by the JNCC on the Government's Joint Position Statement on UXO clearance, which is due to be released soon, in their Response to Applicants UXO clearance position statement (REP5-096). The Applicant directs the ExA to the Applicant's response to JNCC - Response to Written Submissions UXO clearance at Deadline 6 (S_D6_16) for a full response to the JNCC's D5 submission on the UXO clearance position statement.</p> <p>The Applicant is seeking investigative UXO surveys through the DCO (C1 F07) and standalone NRW Marine Licence and welcomes the JNCC's agreement that the inclusion of this activity is logical in order to inform a separate marine licence for high order clearance (if required) and the EPS licensing process.</p>

Planning Inspectorate to Ref. No.	Question	ExQ2 Question	JNCC Response	Applicant's response
			<p>help avoid delays in the determination process.</p> <p>This will also support European Protected Species licence applications, which are likely to be required given the injury ranges for high order clearance provided in the impact assessment.</p>	
REP5-097.4	JNCC The Applicant	<p>Q2.17.14 Marine mammal receptors</p> <p>Can you provide an update regarding marine mammal receptors (reference JNCC.MM.10 in the SoCG with JNCC [REP1-028]) and summarise any remaining principal points of disagreement.</p>	<p>As stated within the latest version of the Statement of Common Ground (SoCG; dated 4 November 2024, but not yet submitted for Examination), JNCC do not have any outstanding principal points of disagreement regarding marine mammal receptors apart from inclusion of UXO clearance in the DCO.</p> <p>A previous concern was how noise abatement for piling was considered in the outline Marine Mammal Mitigation Plan (oMMMP) (APP-207), but the Applicant has now updated this plan and has informed us they will submit a final copy of this plan at Deadline 5.</p>	<p>The Applicant confirms that the necessary updates were made to the Outline Marine Mammal Mitigation Protocol (MMMP) (REP5-032) at Deadline 5 in accordance with the JNCC's advice. This matter is now resolved and this is reflected in row JNCC.MM.10 in the updated Mona and JNCC SoCG (S_D1_15 F02) submitted at Deadline 6.</p> <p>The Applicant welcomes the JNCC's confirmation that there are no outstanding principal points of disagreement regarding marine mammal receptors apart from the inclusion of UXO clearance in the Draft DCO. Please see the Applicant's response in row REP5-097.3 above in reference to this matter.</p>
REP5-097.5	JNCC The Applicant	<p>Q2.17.15 Impacts to marine mammals from impact piling (project alone and cumulatively)</p> <p>Can you provide an update regarding Impacts to marine mammals from impact piling (reference JNCC.MM.15 and JNCC.MM.18 in the SoCG with JNCC [REP1-028]) and summarise any remaining principal points of disagreement.</p>	<p>JNCCs primary point of disagreement regarding impacts from piling related to the use of noise abatement systems (NAS) and how this was presented in the oMMMP. Initially, this was included as a 'Tertiary measure' of mitigation, in which JNCC are of the opinion is insufficient as this does not commit to a serious consideration of its use. Since submitting our Relevant Representations, the applicant has confirmed inclusion of noise abatement in the oMMMP (APP-207) was mistakenly presented as a tertiary measure and that</p>	<p>The Applicant updated the Outline MMMP (REP5-032) and Outline Underwater Sound Management Strategy (UWSMS) (REP5-028) for Deadline 5 to make clear noise abatement (NAS) for piling is considered a secondary measure in line with IEMA guidance (2024), not a tertiary measure.</p> <p>This matter is now resolved and this is reflected in rows JNCC.MM.15 and JNCC.MM.18 in the updated Mona and JNCC SoCG (S_D1_15 F02) submitted at Deadline 6.</p>

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Planning Inspectorate to Ref. No.	Question	ExQ2 Question	JNCC Response	Applicant's response
			<p>both this document and the outline Underwater Sound Management Strategy (oUWSMS; APP-202) should refer to this as a secondary measure of mitigation. The applicant has also informed us they will submit a final version of the oMMMP with these changes included at Deadline 5. Provided this submission is made, JNCC are content with this approach and with this change, JNCC agree sufficient measures are in place to conclude no significant effects in Environmental Impact Assessment (EIA) terms from this project alone.</p>	
REP5-097.6	NRW A JNCC	<p>Q2.17.16 Mitigation and monitoring measures</p> <p>Can you confirm if you are satisfied with the marine mammals mitigation measures being put forward by the Applicant, and provide a summary of reasons if you disagree with the statement in the Environmental Statement Chapter 4 (Vol 2) Marine Mammals [APP-056] paragraphs 4.9.10.1 and 4.12.1.1 that “no marine mammal monitoring to test the predictions made within the impact assessment is considered necessary”.</p>	<p>JNCC are currently satisfied with the marine mammal mitigation measures described in the oMMMP for piling, on the proviso that the requirement to agree the final version of this document with Regulators and SNCBs is secured as a condition of consent. As we maintain our position that UXO clearance is not included in the DCO, we do not consider the mitigation measures for UXO clearance to be adequate.</p> <p>Regarding the need for monitoring to test predictions in the impact assessment, JNCC highlighted at the Preliminary Environmental Information Report (PEIR) stage a lack of justification for such monitoring. This was also not provided within the Environmental Statement. However, we note reference to underwater noise monitoring during piling in the draft DCO (REP4-006). Specifically:</p> <p>25(2): In the event that driven or part-driven pile foundations are proposed, such monitoring must include measurements of</p>	<p>The Applicant welcomes the confirmation that the JNCC are satisfied with the mitigation measures described in the Outline MMMP (REP5-032) for piling, and this is reflected in row JNCC.MM.20 in the updated Mona and JNCC SoCG (S_D1_15 F02) submitted at Deadline 6. The Applicant confirms that Condition 18(h) in the draft DCO (C1 F07) secures the commitment to agree the final version of the MMMP with the licencing authority in consultation with SNCBs if driven or part-driven pile foundations are to be used, and this commitment is also expected to be secured in the standalone NRW ML.</p> <p>The Applicant agrees that the monitoring detailed in Condition 25(2) and 25(4) in the draft DCO (C1 F07) is standard and confirms that it will be adhered to. The Applicant notes the JNCC’s comments on a potential decibel limit for piling from Defra. The Applicant will consider any new policy or regulatory guidance when published. The Applicant considers that sufficient flexibility is built into the project</p>

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			<p>underwater sound generated by the installation of the first four piled foundations of each piled foundation type to be installed unless the licensing authority otherwise agrees in writing.</p> <p>25(4): The results of the initial underwater sound measurements monitored in accordance with sub-paragraph (2) must be provided to the licensing authority within six weeks of the installation of the first four piled foundations. The assessment of this report by the licensing authority will determine whether any further underwater sound monitoring is required. If, in the reasonable opinion of the licensing authority in consultation with the JNCC statutory nature conservation body, the assessment shows significantly different underwater sound modelling results to those predicted and assessed in the environmental statement or failures in mitigation, all piling activity must cease until an update to the marine mammal mitigation plan and further monitoring requirements have been agreed.</p> <p>The above monitoring requirements are standard for piling in DCOs. We highlight that Defra are currently investigating the feasibility of introducing a decibel limit for piling. It is likely this will require additional monitoring to that currently included in the dDCO, or replacement monitoring requirements. We recommend flexibility is built into the DCO to accommodate future policy change and the associated monitoring requirements.</p>	<p>through the UWSMS and MMMP (both of which are secured draft DCO (C1 F07) and expected to be secured in the NRW ML) with both plans finalised post consent in consultation with the JNCC. Therefore, the final UWSMS and final MMMP will consider the latest policy and guidance at the time (as per paragraph 1.1.2.6 in the Outline UWSMS (REP5-028) and paragraph 1.1.2.2 in the Outline MMMP (REP-032)).</p>

Planning Inspectorate to Ref. No.	Question	ExQ2 Question	JNCC Response	Applicant's response
REP5-097.7	NRW A JNCC	<p>Q2.17.19 Mitigation and monitoring measures</p> <p>Can you confirm if you are satisfied with the offshore ornithology mitigation measures being put forward by the Applicant, and provide a summary of reasons if you disagree with the statement in the ES Chapter 5 (Vol 2) Offshore ornithology [REP4-007] paragraph 5.7.8.1 that “<i>no future monitoring is considered given the level of certainty around the potential effects</i>”.</p>	<p>We can confirm that we are satisfied with the offshore ornithology mitigation measures being put forward by the Applicant with regard to the alone and cumulative EIA. We note our conclusion on significant adverse impact on great black-backed gull from cumulative collision mortality at an EIA scale (REP4-098). However, we are content that the Applicant has provided proportionate mitigation for great black-backed gull.</p> <p>We agree with the mitigation proposed by the Applicant with regard to impacts from the cable installation within Liverpool Bay/Bae Lerpwl Special Protected Area (SPA).</p> <p>We do not agree that the mitigation proposed by the Applicant is sufficient to avoid Adverse Effect on Site Integrity (AEoSI) to Liverpool Bay/Bae Lerpwl SPA as a result of the potential for pre-commencement activities, including UXO surveys and UXO clearance, to occur within Liverpool Bay/Bae Lerpwl SPA during the sensitive period for red-throated diver and common scoter (1 November to 31 March, inclusive).</p> <p>We are not currently in a position where we can agree with the outcome of the in-combination Habitat Regulations Assessment with regard to Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA. Therefore, we cannot currently say whether the offshore</p>	<p>The Applicant welcomes that the JNCC are satisfied with the offshore ornithology mitigation measures being put forward.</p> <p>The Applicant can confirm that the seasonal restriction from 1 November to 31 March within Liverpool Bay / Bae Lerpwl SPA now applies to UXO clearance (as well as offshore export cable installation) and that this commitment is included within the Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels (REP5-030) submitted at Deadline 5.</p> <p>The Applicant also submitted a further supporting assessment for Skomer, Skokholm and the Seas off Pembrokeshire / Sgomer, Sgogwm a Moroedd Penfro SPA at Deadline 5 (presented in Offshore ornithology additional supporting in-combination assessment information in line with SNCB advice (REP5-074)). This assessment adopts the age class apportioning approach as advised by the SNCBs, which uses site-specific information on age classes where available. Otherwise, it assumes all birds are adults. This assessment also included the application numbers from the Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Wind Project: Generation Assets as well as the Llŷr floating offshore wind project.</p> <p>In light of the Applicant's submission at Deadline 5, it is understood that the JNCC is able to rule out AEoI for sites under its jurisdiction from the Mona Offshore Wind Project in-combination with other projects and plans. As such, the Applicant and the JNCC</p>

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Planning Inspectorate to Ref. No.	Question	ExQ2 Question	JNCC Response	Applicant's response
			ornithology mitigation measures being put forward by the Applicant are appropriate.	are now agreed on this matter, which is reflected in the updated Initial SoCG between Mona Offshore Wind Project and the JNCC (S_D1_15 F02) submitted at Deadline 6. The Applicant anticipates the JNCC also confirming in its Deadline 6 submissions.