

MONA OFFSHORE WIND PROJECT

Response to NRW ExQ2 Submission

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Image of an offshore wind farm

MONA OFFSHORE WIND PROJECT

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Prepared by:

RPS

Prepared for:

Mona Offshore Wind Ltd.

MONA OFFSHORE WIND PROJECT

Contents

RESPONSE TO NRW EXQ2 SUBMISSION	1
1 RESPONSE TO NRW EXQ2 SUBMISSION	1
1.1 Introduction	1
2 RESPONSE TO NRW EXQ2 SUBMISSION	2

Tables

Table 2.1: REP5-100 - Natural Resources Wales (NRW)	2
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MONA OFFSHORE WIND PROJECT

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,

MONA OFFSHORE WIND PROJECT

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.

MONA OFFSHORE WIND PROJECT

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).

MONA OFFSHORE WIND PROJECT

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

MONA OFFSHORE WIND PROJECT

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 NRW ExQ2 Submission

1.1 Introduction

The Applicant has responded to NRW (A)'s ExQ2 responses below.

2 Response to NRW EXQ2 Submission

Table 2.1: REP5-100 - Natural Resources Wales (NRW)

Planning Inspectorate to Ref. No.	Question ExQ2	Question	NRW Response	Applicant's response
REP5-100.1	NRW (A)	<p>Q.2.5.14 Cod and Herring</p> <p>Can you provide an update regarding cod and herring issues and summarise any remaining principal points of disagreement including any monitoring requirements.</p>	<p>The primary remaining point of disagreement relates to Cod. The Applicant and NRW (A) disagree on the Applicant's assessment of 'low' magnitude of impact from the project alone in relation to cod and underwater noise impacts. This is primarily due to the Applicant's modelled noise radius covering 21%+ of the high intensity spawning ground for cod, alongside a number of other factors which we have written in detail across various submissions into the examination process (notably our Written Representations [REP1-056]). The Applicant's low magnitude assessment, results in an overall 'minor adverse' significance assessment, meaning mitigation is not required.</p> <p>NRW(A) have advised that the low magnitude assessment should be revised upwards, resulting in a 'moderate adverse' significance assessment which would then trigger a need for mitigation to protect cod during their peak spawning period. We have suggested that adequate mitigation would be to cease piling within the key spawning months (February and March).</p> <p>Despite this disagreement, we are in discussions with the Applicant on this matter and subject to the Underwater Sound Management Strategy (UWSMS) being developed further in consultation with NRW (A), and the necessary mitigation measures included and captured securely, we anticipate this issue will</p>	<p>The Applicant welcomes Natural Resources Wales (Advisory) (NRW (A)) comments on the Mitigation and Monitoring Schedule (REP5-024) and agrees with NRW (A)'s summary of the status of this matter. The Applicant confirms that an updated version of the outline Underwater Sound Management Strategy (REP5-028) was submitted at Deadline 5 to reflect feedback received from NRW (A) and the Joint Nature Conservation Committee (JNCC). This matter is recorded as 'not agreed but not material' in the Mona and Natural Resource Wales (Advisory) Offshore Statement of Common Ground (SoCG) (S_D1_12 F02) submitted at Deadline 6 (see row NRW.FSF.16). Therefore, the matter is considered closed.</p>

MONA OFFSHORE WIND PROJECT

Planning Inspectorate Ref. No.	Question	ExQ2 Question	NRW Response	Applicant's response
			<p>be resolved. We are of the understanding that the Applicant will be submitting a revised UWSMS into the examination at Deadline 5. We will provide further advice once we have had the opportunity to fully review that submission.</p> <p>NRW (A) agrees with the cumulative assessment for cod of 'moderate adverse' significance for underwater noise impacts, requiring mitigation. This is proposed to be secured within the UWSMS, however, as previously advised, the document contains limited detail at present. NRW(A) have committed to working with the Applicant on securing the measures proposed as the document is further developed.</p> <p>Herring has been assessed as requiring mitigation for both alone and cumulative impacts, in relation to underwater noise impacts, which NRW (A) are in agreement with. This mitigation will be secured within the UWSMS. We will be further advising the Applicant on appropriate mitigation measures for herring as the UWSMS document is further developed.</p> <p>The Mitigation and Monitoring schedule [REP4-013] was recently updated, following NRW (A) highlighting the omission of some key documents that were referenced in the fish and shellfish document as being of relevance to fish. NRW(A) are content with this document as it currently stands.</p>	
REP5-100.2	The Applicant	Q2.14.1 Cable protection In its D3 submission [REP3-090], NRW (A) states that in the event that any area of cable protection	Whilst this question is not directed at NRW (A), we note that it is the Applicant's expectation that a condition will be imposed within the standalone NRW Marine Licence securing the commitment to	The Applicant welcomes NRW (A)'s response. The Applicant can confirm that the Marine Licence Principles Document (REP5-022) was updated at Deadline 5 to outline this commitment (see the

MONA OFFSHORE WIND PROJECT

Planning Inspectorate to Ref. No.	Question	ExQ2 Question	NRW Response	Applicant's response
		<p>exceeding 5% of navigable depth is identified, a further physical processes assessment in the shallow nearshore environment just seawards of MLWS over the exit pits should be conducted (para 102). Do you agree if this is appropriate and if so, how would this be secured?</p>	<p>limit changes in water depth to 5% caused by the presence of cable protection along the export cable corridor up to and including the exit pits just seaward of MLWS. We note in REP4-047 that the Applicant states that where that 5% restriction is anticipated to be exceeded, the Applicant will consult with NRW (A) in respect of agreeing an alternative position. In our deadline 5 submissions, NRW (A) have agreed with the Applicant on this position. We note and agree that this discussion will involve consideration of whether further physical processes and benthic ecology assessments in the shallow nearshore area would be required, and if so on what terms these assessments would be undertaken. NRW (A) advise that this commitment is secured in the stand-alone Marine Licence – we will also be advising the regulator of the transmission asset the same.</p>	<p>'Offshore Construction Method Statement' row) and that the Mitigation and Monitoring Schedule (MMS) (J10 F06) has also been updated at Deadline 6 (see row 8 of the MMS). a suitable alternative position.</p> <p>The Applicant welcomes NRW (A)'s agreement as noted under item NRW.PP.1 within the Mona and Natural Resource Wales (Advisory) Offshore Statement of Common Ground (SoCG) (S_D1_12 F02) submitted at Deadline 6. Subject to these amendments, NRW (A) agree that this matter is closed.</p>
REP5-100.3	The Applicant	<p>Q2.14.2 Cable burial</p> <p>In its D3 submission [REP3-030] NRW (A) advise that the Applicant should review historical beach profiles in order to determine the depth of cable burial to avoid exposure following a major storm event. Could this be secured via the Landfall Construction Method Statement?</p>	<p>Whilst this question is not directed at NRW (A), we welcome the Applicant's commitment that consideration will be given to the natural envelope of beach profile change over time from historical beach profiles – this is in order to inform the final detailed design of the drill duct profile to avoid the risk of cable exposure at the beach. This addition is detailed in section 1.10.3.2 of the updated Outline Landfall Construction Method Statement [REP4-017].</p>	<p>The Applicant welcomes NRW (A)'s response and considers this matter closed.</p>
REP5-100.4	The Applicant	<p>Q2.14.3 Sandwave recovery monitoring</p> <p>Noting your response to ExQ1 (Q1.14.4) [REP3-062] that the geomorphological surveys already</p>	<p>Whilst this question is not directed at NRW (A), we agree that this should be secured in the updated Offshore In-Principle Monitoring Plan to be submitted at D5.</p>	<p>The Applicant can confirm that monitoring of sandwave clearance recovery is included in Table 1.3 of the Offshore In-Principle Monitoring Plan submitted at Deadline 5 (REP5-027).</p>

MONA OFFSHORE WIND PROJECT

Planning Inspectorate to Ref. No.	Question	ExQ2 Question	NRW Response	Applicant's response
		<p>committed to will now be considered in the context of sandwave recovery modelling for information purposes, can you ensure that this is included in the updated Offshore In-Principle Monitoring Plan to be submitted at D5 so that it is explicit this will be completed and which DML condition secures the monitoring.</p>		
REP5-100.5	The Applicant NRW A JNCC	<p>Q.2.17.5 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>	<p>From a Physical Processes and Benthic Ecology perspective, NRW (A) request that the mitigation is amended to ensure that where the 5% restriction in water depth is exceeded, the Applicant will consult with NRW (A) in agreeing an alternative position. As noted in REP3-090, para 102, this discussion will involve consideration of whether further physical processes and benthic ecology assessment in the shallow nearshore area would be required, and if so on what terms that assessment would be undertaken. NRW (A) request that this commitment is secured in the stand-alone Marine Licence and secured in the appropriate plans.</p>	<p>The Applicant notes NRW (A)'s response and directs NRW (A) to their Response to the Examining Authority's Written Questions at Deadline 5 (REP5-080), which confirms in response to Q2.17.5 that the Applicant anticipates NRW (A) will be a consultee in respect of agreeing any requirement for further benthic subtidal and intertidal ecology assessment in the shallow nearshore area and the scope of this with the licencing authority as part of the NRW marine licencing process for the transmission works.</p> <p>To further address this point, the Applicant updated the Marine Licence Principles Document (REP5-022) at Deadline 5 to outline this commitment (see the 'Offshore Construction Method Statement' row), and the Mitigation and Monitoring Schedule (MMS) (J10 F06) has also been updated at Deadline 6 (see row 8 of the MMS).</p> <p>The Applicant notes that with these amendments/caveats, this matter is now agreed between the Applicant and NRW (A) as outlined in the SoCG between Mona Offshore Wind Project and</p>

MONA OFFSHORE WIND PROJECT

Planning Inspectorate to Ref. No.	Question	ExQ2 Question	NRW Response	Applicant's response
				NRW (A) – Offshore (S_D1_15 F02) submitted at Deadline 6.
REP5-100.6	The Applicant	<p>Q2.17.6 Close proximity to the works</p> <p>The Mitigation and Monitoring Schedule [REP4-013] reference no 10 notes that material arising from drilling and/or sandwave clearance would be deposited in close proximity to the works. Can you clarify what is meant by close proximity to the works and what distance parameters and constraints were considered under the maximum design scenario. For example, could sandwave clearance on the Constable Bank result in material arising being deposited within Constable Bank?</p>	<p>Whilst this question is not directed to NRW (A), we note that Constable Bank is excluded as a disposal site and therefore any material removed during sand wave clearance is assumed to be taken off the sandbank. Please note that any sediment removed by sand wave clearance along the export cable corridor, will be deposited in the newly licenced disposal sites which are anticipated to be located in close proximity of the sand wave clearance activities.</p>	<p>The Applicant notes this response from NRW (A) and highlights their response to Q2.17.6 of the ExQ2 at Deadline 5 (REP5-080) noting the commitment to the development and adherence to an Offshore Construction Method Statement (oCMS) which includes a Cable specification and installation plan (CSIP) that will only permit sandwave clearance on the Constable Bank within the swept path area (20 m) of the cable burial tool, and that material arising would be deposited back within the Offshore Order Limits in the general vicinity of Constable Bank so that it will naturally be brought back into the sediment transport system to aid in recovery of the sandwave features. NRW (A) have correctly highlighted that Constable Bank is excluded as a disposal site and so material arising from sandwave clearance activities elsewhere within the Mona Offshore Cable Corridor will not be disposed of within the Constable Bank.</p>
REP5-100.7	NRW A JNCC	<p>Q.2.17.9 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 that “no benthic subtidal and intertidal ecology monitoring to</p>	<p>NRW (A) are satisfied with the benthic subtidal and intertidal ecology mitigation measures put forward by the Applicant providing the request above under Q2.17.5 to amend the relevant mitigation is met. We agree with the statement that “<i>no benthic subtidal and intertidal ecology monitoring to test the predictions made within the impact assessment is considered necessary</i>”.</p>	<p>The Applicant welcomes NRW (A)'s response and refers to its response to Q2.17.5 (see row REP5-100.5) above. The Applicant notes that with the amendments/caveats made to the Marine Licence Principles Document (REP5-022) submitted at Deadline 5 and the MMS (J10 F06) updated at Deadline 6, the Applicant considers this matter to be closed.</p>

MONA OFFSHORE WIND PROJECT

Planning Inspectorate to Ref. No.	Question	ExQ2 Question	NRW Response	Applicant's response
		test the predictions made within the impact assessment is considered necessary.		
REP5-100.8	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-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>Although not directed at NRW MLT, we would however advise the following in relation to timeframes in relation to a separate Marine Licence application and decision. A separate Marine Licence application for UXO clearance would likely fall under our Band 3 application process. Band 3 applications do not have a service level agreement for determination timescales. Band 3 projects are varied and often complex in nature so determination time can vary significantly.</p> <p>Please also see NRW (A)'s deadline 5 submission, section 1.2.7 for our full comments with regard to Marine Mammals.</p> <p>NRW (A) confirm that for fish, the staged hierarchy approach is acceptable. Any further developments to make the approach more robust with regard for mammals would also be of benefit to fish receptors.</p>	<p>The Applicant has reviewed its position on the inclusion of high order Unexploded Ordnance (UXO) clearance in the Draft Development Consent Order (DCO) in light of the SNCBs (and principally the JNCC's) concerns and has subsequently committed to the use of low order UXO clearance (i.e. UXO clearance method which does not seek to detonate the unexploded ordnance) only through the DCO. 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 (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 (REP5-024) and reflected in the Outline Marine Mammal Mitigation Protocol (MMMP) (REP5-032) and the Outline UWSMS (REP5-028) updated at Deadline 5. The Applicant confirms that if high order UXO clearance (i.e. UXO clearance method, which intentionally seeks to detonate the unexploded ordnance) is required, this will be subject to a separate marine licence application.</p> <p>The Applicant notes NRW (A)'s indication that a separate Marine Licence application for high order UXO clearance (if required) would likely fall under</p>

MONA OFFSHORE WIND PROJECT

Planning Inspectorate to Ref. No.	Question	ExQ2 Question	NRW Response	Applicant's response
				<p>the Band 3 application process and confirmation that these applications do not have a service level agreement for determination timescales. As per the Applicant's response in Response to Examining Authority's Written Questions (ExQ2) (REP5-080), this lack of statutory timescales for marine licensing can lead to substantially longer determination timescales and can present significant challenges to project scheduling in the pre-construction period with the potential to significant impact the timely delivery of the Mona Offshore Wind Project.</p> <p>The Applicant welcomes confirmation from NRW (A) that the staged hierarchy approach put forward by the Applicant in the Outline Underwater Sound Management Strategy (REP5-028) is acceptable.</p>
REP5-100.9	The Applicant	<p>Q2.17.13 Mitigation and Monitoring Schedule</p> <p>Reference no 35 in the Mitigation and Monitoring Schedule [REP4-013] relates to Underwater Sound Management Strategy (UWSMS) that includes for consideration of Noise Abatement Systems (NAS) as part of mitigation options. Can you clarify the statement ...and is expected to be secured within the standalone Natural Resources Wales marine licence (that appears in means of securing the commitment). As the standalone Natural Resources Wales marine licence would be for the transmission assets, can you</p>	<p>Whist this question is not directed to NRW (A), we clarify that our statement "<i>...and is expected to be secured within the standalone NRW ML</i>" was not intended to refer to the NRW ML only (i.e. the transmission assets alone), but that in addition to the current consenting application (for the array) we would also expect mitigation for the transmission assets to be secured within the standalone NRW ML.</p>	<p>The Applicant reiterates that the UWSMS applies to both the generation and transmission infrastructure and directs NRW (A) to its response to Q2.17.3 in the Applicant's Response to Examining Authority's Written Questions (ExQ2) (REP5-080)) for further information.</p>

MONA OFFSHORE WIND PROJECT

Planning Inspectorate to Ref. No.	Question	ExQ2 Question	NRW Response	Applicant's response
		confirm what measure would be in place for Array area.		
REP5-100.10	NRW A JNCC	<p>Q.2.17.16 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 ES 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>Please see paragraph 180-181 of REP1-056, and paragraph 74 in REP3-090.</p>	<p>This matter is now agreed – see the updated SoCG between Mona Offshore Wind Project and NRW (A) – Offshore submitted at Deadline 6 (S_D1_12 F02), rows NRW.MM.19 and NRW.MM.20.</p>
REP5-100.11	NRW A JNCC	<p>Q.2.17.19 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 “no future monitoring is considered given the level of certainty around the potential effects”.</p>	<p>NRW (A) welcome the offshore ornithology mitigation measures put forward, namely:</p> <ul style="list-style-type: none"> • A minimum lower blade tip height (air draught) of 34 m above Lowest Astronomical Tide (LAT), which allowing for -4 m tidal offset between LAT and mean sea level (MSL) is an air draught of 30 m above MSL (see Table 1.5 of APP-093). • Development of, and adherence to, an offshore Environmental Management Plan (EMP). The Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels will be included within the Offshore EMP. They will include a timing restriction of no offshore export cable 	<p>The Applicant welcomes that NRW (A) is satisfied with the offshore ornithology mitigation measures being put forward by the Mona Offshore Wind Project.</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. In the updated SoCG with NRW(A) (S_D1_12 F02) submitted at Deadline 6, NRW (A) have ruled out AEol for Liverpool Bay/Bae Lerpwl SPA both for the</p>

MONA OFFSHORE WIND PROJECT

Planning Inspectorate to Ref. No.	Question	ExQ2 Question	NRW Response	Applicant's response
			<p>installation during the period 1 November to 31 March within the Liverpool Bay Special Protection Area (SPA).</p> <ul style="list-style-type: none"> Development and adherence to an offshore Environmental Management Plan (EMP) that will include a Marine Pollution Contingency Plan (MPCP) which will include planning for accidental spills, address all potential contaminant releases and include key emergency details. <p>We 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 [REP4-105] and for kittiwake for the Pen y Gogarth / Great Orme's Head SSSI (see our Deadline 5 advice on REP4-025). However, we are content that the Applicant has provided proportionate mitigation (through the air draught height) for great black-backed gull and kittiwake.</p> <p>We agree with the mitigation proposed by the Applicant with regard to impacts from the cable installation within Liverpool Bay / Bae Lerpwl SPA (measures to minimise disturbance to marine mammals and rafting birds, including the seasonal timing restriction). However, we do not agree that the mitigation proposed by the Applicant is sufficient to avoid an adverse effect on site integrity (AEoSI) to Liverpool Bay/Bae Lerpwl SPA as a result of the potential for pre-commencement activities, including UXO clearance, to occur within Liverpool Bay/Bae</p>	<p>Mona Offshore Wind Project alone (row NRW.HRA.37) and in-combination with other plans and projects (row NRW.HRA.38).</p> <p>The Applicant 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 NRW (A) can rule out AEoI for Welsh designated sites from the Mona Offshore Wind Project in-combination with other projects and plans apart from northern gannet at Grassholm SPA. This is reflected in the updated Mona and Natural Resource Wales (Advisory) Offshore SoCG (S_D1_12 F02) at Deadline 6 and the Applicant anticipates NRW (A) also confirming in its Deadline 6 submissions. The Applicant and NRW (A) have undertaken further engagement between Deadline 5 and 6 with regard to northern gannet at Grassholm SPA in-combination assessment. In light of these discussions, the Applicant has submitted a Revised Assessment for Northern Gannet at Grassholm SPA (S_D6_9) in accordance with NRW (A)'s advice at</p>

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			<p>Lerpwl SPA during the sensitive period for red-throated diver and common scoter (1st November to 31st March, inclusive).</p> <p>However, we understand from recent correspondence with the Applicant (02 December 2024), that it is their intention to remove high-order clearance options from the draft development consent order (dDCO), its associated deemed Marine Licence (dML), and the stand alone Marine Licence, and that the seasonal timing restriction on the cable activities within Liverpool Bay SPA will also be applied to the low-order UXO clearance. Once this information is submitted into the examination at Deadline 5, we will provide further advice with respect to the above.</p> <p>Given that we are not currently in a position where we can agree with the outcome of the in-combination HRA with regard to Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA, Grassholm SPA and Aberdaron Coast and Bardsey Island SPA, we cannot currently say whether the offshore ornithology mitigation measures being put forward by the Applicant are appropriate at this stage.</p>	<p>Deadline 6. This assessment concludes no AEol for the Mona Offshore Wind Project in-combination with other plans and projects. The Applicant anticipates NRW (A) being able to confirm its position with respect to this conclusion at Deadline 7.</p>