Partners in UK offshore wind

MONA OFFSHORE WIND PROJECT

Response to Welsh Government (Fisheries Division) Deadline 5 Submission

Deadline: 6

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F01

Image of an offshore wind farm

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Prepared for:

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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, licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).

Term	Meaning
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 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.

Term	Meaning
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).
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

Units

Unit	Description
GW	Gigawatt

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

1 RESPONSE TO WELSH GOVERNMENT (FISHERIES DIVISION) DEADLINE 5 SUBMISSION

1.1 Introduction

1.1.1.1 The Applicant has responded to the Welsh Government Fisheries Division's Deadline 5 submission below.

2 Response to Welsh Government Fisheries Division – Commercial Fisheries

Table 2.1: REP5-091 Welsh Government Fisheries Division

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-091.1	The Welsh Government's fisheries policy team recently became aware of the consultations regarding the Mona offshore wind development and the potential effects of the array on fish stocks and fisheries in the north Irish Sea. Having reviewed the planning documentation, representations and responses, fisheries policy officials ask that the following points be considered in deciding reasonable mitigation for impacts of the construction of the Mona Array.	The Applicant thanks the Welsh Government Fisheries policy team for their engagement and for reviewing the documentation, representations and responses related to the Mona Offshore Wind Project. The Applicant appreciates the points raised and the effort involved in contributing to the Examination. The Applicant confirms that all specific queries and concerns outlined have been comprehensively addressed in the responses provided below. The Applicant highlights that as part of the Mona Offshore Wind Project's engagement programme initiated in 2021, consultations were conducted with the Welsh Government to incorporate relevant stakeholder input and ensure thorough consideration of key issues. These consultations included: • Prior to the statutory consultation on the Preliminary Environmental Information Report (PEIR), a meeting was held with Welsh Government on 29 March 2022 specifically in relation to commercial fisheries matters. Attendees from Welsh Government included the head of the shore-based enforcement team, a marine enforcement officer and a member of the science/enforcement team (see minutes in Appendix H9.1 of Technical Engagement Plan Appendices (APP-043)). The Applicant notes that the minutes include an action on the Welsh Government attendees present to "*review the (consultee) list and advise if any organisations/groups are missing*" and that no such suggestions were made. • Welsh Government Marine and Fisheries were invited to attend a post-scoping meeting with Conwy fishermen on 25 November 2022 (H.15.1 of APP-042). • Welsh Government Marine and Fisheries and Welsh Government Marine Enforcement Officers were subsequently included in the statutory consultation on the PEIR (October to November 2022 and March to April 2023). The Applicant acknowledges the oral submissions made by Welsh Government at Issue Specific Hearing 6 on 10 and 11 December 2024 with respect to the request for further signposting to where key documentation relating to fisheries matters can be located within the Mona Offshore Wind Project DCO Examination Library and has endeavoured to include detailed references throughout this response accordingly.

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-091.2	The Mona Array development is likely to have an impact on various species and their habitats. Officials note that the proposed Mona Array will be situated in important plaice and sole spawning and nursery grounds. The Environmental Statement does not appear to consider the potential impact of the Array construction and operation to these commercial species. If there is an impact on these stocks, there will be a likely knock-on effect to commercial fishing in the wider Irish Sea. The applicant may wish to reconsider this in designing mitigation for the impacts of the project on existing marine users.	The Applicant notes that the response below addresses the hearing action point HAP_ISH6_5, which requests that the Applicant "*Include an explanatory note sign posting to relevant documents how the Proposed Development has considered the effects on important plaice and sole spawning and nursery grounds*". The Applicant has utilised published resources and data including Campanella and van der Kooij (2021), Aires *et al*. (2014), Ellis *et al*. (2012), and Coull *et al*. (1998), alongside a range of up-to-date nearby offshore wind farm monitoring surveys to appropriately characterise the extent of the plaice and Dover sole spawning and nursery grounds surrounding the Mona Array, and these have been described in section 1.5 of Volume 6, Annex 3.1: Fish and shellfish ecology technical report (APP-089). Both species were identified as Important Ecological Features (IEFs) as listed in Table 3.14 and assessed against all relevant impacts in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). The impact assessments considered evidence from a range of sources, including published scientific studies and offshore wind farm monitoring for fish and shellfish species (including plaice and sole), to assess the impacts and assign sensitivities and assessments were undertaken on a maximum design scenario. Specifically, for plaice and sole spawning grounds, the impacts from the Mona Offshore Wind Project, which present the greatest potential risks, are from habitat loss (temporary and long term) and the impacts of underwater sound. Habitat loss effects are predicted to be limited in the context of the available habitats for these species due to both plaice and sole being mobile pelagic spawners that can move away from any temporary habitat loss impact (Ecological Marine Unit, 2004) and spawning grounds for both species covering a wide area across the entire Irish Sea (Ellis *et al*., 2012). Long term habitat loss is unlikely to impact pelagic spawners significantly, and evidence from post-construction monitoring at Belgian offshore wind farms has reported that fish assemblages undergo no significant changes due to the presence of offshore wind farms (Degraer *et al*., 2020), indicating recovery of these species from any disturbance in the short and long term. The potential impact of underwater sound on plaice and sole was also assessed, with Mueller-Blenke *et al*. (2010) finding that sole have a range of responses to sound exposure levels, with no direct relationship between exposure levels and behavioural responses able to be concluded. Both sole and plaice are Group 1 hearing sensitivity species, with no swim bladder and therefore dependent on particle motion detection for underwater sound impacts to occur (Popper *et al*., 2014). This would limit the extent of injury and behavioural effects to more restricted areas compared to more sensitive fish species (e.g. cod and herring). As plaice and sole are both mobile pelagic spawners with no specific seabed spawning preference and broad spawning grounds across the Irish Sea, the potential for behavioural and injury effects from

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
		underwater sound are not predicted to be significant. These assessments all concluded that there were no significant impacts on any of these species, and therefore, no specific mitigation measures were deemed necessary for sole and plaice. Where the fish and shellfish ecology impact assessment (APP-055) identified a potential risk of significant effects on IEFs, targeted mitigation measures were identified to reduce these. Specifically, the impact of piling noise on cod and herring spawning was identified as a potential risk and therefore measures were identified to reduce the magnitude of effect of underwater sound on these receptors via the Outline Underwater Sound Management Strategy (UWSMS) (REP5-028). While the UWSMS has been developed for cod and herring spawning in particular, the mitigation measures set out within the UWSMS will provide general benefits to all fish and shellfish receptors by reducing the amount of acoustic energy entering the marine environment. Regarding the potential for indirect effects to commercial fishing of plaice and sole in the wider Irish Sea, the Applicant highlights sections 6.8.7 and 6.10.5 of Volume 2, Chapter 6: Commercial fisheries (APP-058), which has assessed the potential for indirect effects on commercially important fish and shellfish resources as a result of impacts on fish and shellfish ecology receptors (as identified within Volume 2, Chapter 3: Fish and shellfish ecology (APP-055)), and specifically identifies sole and plaice as commercially important species in paragraph 6.8.7.3. The commercial fisheries assessment has identified Beam trawl vessels which predominantly target sole and plaice as a discrete receptor group (Table 6.8 of Volume 2, Chapter 6: Commercial fisheries (APP-058)). The Applicant highlights that the assessment presented within section 6.8.7 and 6.10.5 of Volume 2, Chapter 6: Commercial fisheries concludes that there is no significant impact on this receptor group for the project alone or cumulatively with other projects in the wider Irish Sea. Therefore, further mitigation beyond the measures as described in the Outline Fisheries Liaison and Co-existence Plan (FLCP) (REP3-016) were not deemed necessary for the beam trawl vessel receptor group.
REP5-091.3	The Welsh Government is focused on delivering the king scallop fishery management plan (FMP). Two of the key commercial fisheries which are likely to be impacted by the project are king and queen scallop due to the location of the proposed Array and the biology of the species. Volume 2, Chapter 3: Fish and shellfish ecology and Volume 6, Annex 3.1: Fish and Shellfish Ecology Technical Report of the Environmental Statement do show some consideration of scallop biology and potential responses to habitat disturbance. It is not clear, however,	The ecological baseline presented in Volume 6, Annex 3.1: Fish and shellfish ecology technical report (APP-089) for king and queen scallops within the east Irish Sea incorporates data and research from Bangor University in the form of annual scallop stock assessment reports, research from the Isle of Man Manx Marine Environmental Assessment, data provided by scallop fisheries in the area, and monitoring surveys from nearby offshore wind farms. This considers that both scallop species are likely to spawn across the area which they occur and are targeted by commercial fisheries. The Applicant assessed both king and queen scallop as IEFs for each impact in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055) and concluded that there were no significant impacts. The assessment is based on a conservative maximum design scenario wherein construction will occur sequentially throughout the Mona

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
	that studies of other areas are directly applicable to the scallops in the array area. Officials understand that scallop growth and dispersal rates vary according to differences in habitat, ecosystems, water temperature, light and ocean currents. Recruitment to the fishery also depends on population densities and proximity of spawning scallop.	Offshore Wind Project, with only a small proportion of the total footprint affected at any one time, and so recovery of scallop populations will be occurring even throughout the construction phase and following completion of construction. The ecological baselines of other nearby projects which have been incorporated into this assessment utilised many of the same data sources and can therefore be considered applicable to the wider east Irish Sea environment.
REP5-091.4	If scallops become more dispersed as a result of the construction phase, it should not be assumed that the pre-disturbance growth rates and stock replenishment rates would be the same. The evidence considered in assessing the impact of the construction and long-term presence of the Array is not all specific to this location. Consequently, the conclusions regarding the impact on scallop stocks seem overoptimistic which casts doubt on the assessment of reasonable mitigation for businesses whose income will be affected.	The Applicant refers to the response to REP5-091.3 above and reiterates that the construction scenario in the maximum design scenario is likely to be precautionary. Construction will occur sequentially throughout the construction phase and therefore only a small proportion of the total habitat loss would be affected at any one time, with recovery into affected areas occurring throughout the construction phase, thereby further reducing any potential disturbance or dispersal impacts on scallop populations. Both queen and king scallop occur throughout the western Irish Sea (from North Wales, around the Isle of Man and to the south coast of Scotland) and therefore the proportion of habitats affected by construction will be relatively small in the context of the scallop habitat in the wider Irish Sea. Recovery of scallops will occur into affected areas via a combination of adult movement and larval dispersion from unimpacted areas within the Mona Offshore Wind Project boundary and suitable habitats in the wider region. The ecological baseline presented in Volume 6, Annex 3.1: Fish and shellfish ecology technical report (APP-089) is based on a range of up-to-date scientific research and data and is considered to have broad applicability across the east Irish Sea.
REP5-091.5	The scallop mitigation zone, 1400m spacing between turbines and minimising snagging hazards for dredging are welcome mitigations for fishers. It is unlikely, however, that anyone could predict the precise impact of the disturbance caused by construction of the array and as such the applicant could commit to a more dynamic and reactive approach to mitigation throughout the life of the project.	The Applicant acknowledges the support given to commitments presented within the Outline FLCP (REP3-016). The Applicant acknowledges that predicting the precise impact of the disturbance to commercial fisheries caused by the construction of the Mona Offshore Wind Project is challenging. To address this uncertainty, the magnitude of impact has been defined within a range (e.g. 5-10% potential loss of revenue) (see Table 6.10 within Volume 2, Chapter 6: Commercial fisheries (APP-058)), reflecting the recognition of data limitations and assumptions outlined in Table 1.1 of Volume 6, Annex 6.1: Commercial fisheries technical report (APP-097). The range in magnitude of impact is therefore considered in determining the significance of potential effects within Volume 2, Chapter 6: Commercial fisheries (APP-058). The Applicant considers that uncertainty has been duly accounted for in the assessment conclusions as presented in Volume 2, Chapter 6: Commercial fisheries (APP-058), however, in order to contribute to the evidence base for commercial fishing activity and offshore wind, the Outline FLCP (REP3-016) includes the commitment to undertake monitoring of vessel

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		monitoring system (VMS), inshore VMS (i-VMS) and landings data from the commercial fisheries study area annually for the first five years of the operations and maintenance phase. The exact specification of this monitoring will be specified within the final FLCP, which will be developed via further consultation with commercial fisheries stakeholders. It is expected that specific details of objectives; review cycles and potential to amend the monitoring, will be developed via these discussions. The Applicant has committed to undertaking this monitoring within the Outline FLCP (REP3-016), with which the final FLCP must accord, as secured within Condition 18(1)(e)(v) of the deemed marine licence under Schedule 14 of the draft DCO (C1 F07) and expected to be secured within the standalone NRW marine licence. Additionally, commercial fisheries stakeholders consider monitoring of queen scallop to also be important to confirm the accuracy of the assessment presented in Volume 2, Chapter 6: Commercial fisheries (APP-058). The Applicant has acknowledged this and has therefore included a new commitment to include a scallop monitoring programme within the revised Outline FLCP at Deadline 3 (REP3-016) and the revised Offshore In-Principle Monitoring Plan (OIPMP) at Deadline 5 (REP5-026). Development of this monitoring programme will consider methodologies from other regional monitoring programmes and input from key fisheries stakeholders and will be cognisant of similar commitments made by the Morgan Offshore Wind Project: Generation Assets, where possible adopting aligned methodologies to ensure a more strategic approach is taken to the monitoring. This will serve to ensure a more comprehensive evidence base is established.
REP5-091.6	Welsh Government officials understand that Bangor University academics have survey data over several years but have not been commissioned or had independent resources to analyse the data that is available. Analysis of this data could give greater confidence in the current status scallop stocks in the area and the potential impact of the array construction would have on scallop stocks in and around the proposed Mona Array area as this would be location specific.	The Applicant has incorporated data and research from Bangor University in the form of annual stock assessments to inform the king and queen scallop baseline in section 1.10.2 of Volume 6, Annex 3.1: Fish and shellfish ecology technical report (APP-089). These species were considered as IEFs and assessed against each impact in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055), with no significant impacts concluded for the project alone or cumulatively. The Applicant will work with all relevant statutory bodies and stakeholders in the Irish Sea when developing the scallop monitoring programme as proposed in the OIPMP (REP5-026), to ensure any monitoring is properly contextualised. This will include consideration of ongoing and future work being undertaken on these species by local organisations, including regional monitoring programmes and input from key fisheries stakeholders.
REP5-091.7	Welsh Government officials also note that further monitoring of scallop stocks in and around the proposed Mona Array area would give a better indication of whether stocks recover following construction. The information	As detailed in the response to REP5-091.5 above, the Applicant has committed to undertaking monitoring of scallop as set out in the OIPMP (REP5-026), with further specific details to be developed post-consent.

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	could inform responsive mitigation measures post-construction.	
REP5-091.8	Even if the assumptions in the reports are correct and scallop populations recover “within a small number of years” (para 3.9.2.20 ES Volume 2, Chapter 3), if skippers of fishing vessels do not have confidence in the safety of dredging or trawling in the array area their livelihoods will be impacted. The fishery liaison officer is a welcome addition to the project and will be key to engaging with fishers and crucially acting on any concerns to ensure the area can continue to be fished safely.	The Applicant has assessed the potential impacts of the Mona Offshore Wind Project on navigational safety for fishing vessels within Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). This included risk to vessels engaged in fishing within the Mona Array Area or along the Mona Offshore Cable Corridor, and fishing vessels on transit passing adjacent to or through the Mona Array Area and included consideration of adverse weather conditions. The risk of collision and allision with wind turbines or offshore substation platforms, as well as vessels operating within or adjacent to the Mona Array Area was identified as part of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) in hazards 3, 4, 8, 17 and 25. These were discussed during the hazard workshop undertaken in September 2023, which was attended by representatives from fishing organisations (Anglo Northern Irish Fish Producers Organisation (ANIFPO) and Scottish White Fish Producers Association (SWFPA)) and these hazards were scored as Medium Risk – Tolerable if As Low as Reasonably Practicable (ALARP). Section 1.8.5 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) discusses impacts to fishing, noting issues surrounding “Spatial Squeeze” and reflected the levels of fishing activity detected as part of the vessel traffic surveys reported in Section 1.6 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). These hazards recognised that causes could include the presence of infrastructure and therefore reduced sea room, adverse weather conditions and increased vessel traffic amongst others. On the basis that crews of fishing vessels are trained, the vessels are equipped with navigational equipment and the spacing between Mona Offshore Wind Project infrastructure exceeds the spacing of other offshore wind farms in the UK, these risks were determined to be ALARP. Similar conclusions were reached within the Cumulative Regional Navigation Risk Assessment presented in Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098). The Statement of Common Ground with the MCA submitted at Deadline 3 (REP3-026) notes agreement on these findings. The shipping and navigation assessment was undertaken with a Maximum Design Scenario (Table 7.16 of Volume 2, Chapter 7: Shipping and navigation (APP-059)) with 90% of the length of inter-array cables buried to a minimum depth of 0.5 m or greater (informed by a cable burial risk assessment which includes consideration of seabed level change) and a commitment to provision of ‘As-laid’ co-ordinates of cables to the UKHO and KIS-ORCA service to be marked on Admiralty Charts and fisherman’s awareness charts (paper and electronic format). These measures would greatly reduce the risk of snagging of fishing gear. Where it is not possible to sufficient bury cables, the Mona Offshore Wind Project would address this with further

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		measures. This includes the use of cable protection designed to minimise snagging risks as far as possible, cable burial monitoring, the timely and efficient distribution of notice to mariners, the use of guard vessels for cable exposures which would result in significant risk, as described in Table 1.2 of the Outline FLCP (REP3-3-016). With measures proposed by the Mona Offshore Wind Project in place, the risk of snagging of fishing gear was assessed as minor adverse in Section 7.9.11 of Volume 2, Chapter 7: Shipping and navigation (APP-059). An assessment of impacts to Search and Rescue was undertaken in Section 7.9.6 of Volume 2, Chapter 7: Shipping and navigation (APP-059) in compliance with Maritime and Coastguard Agency requirements in MGN654 Annex 5. The assessment concluded that with commitments to two lines of orientation and minimum spacing between wind turbines and offshore substation platforms, safe and effective Search and Rescue could still be conducted within and around the Mona Offshore Wind Project, and other cumulative adjacent projects. As recognised by Welsh Government in their response, a project-specific Fisheries Liaison Officer (FLO) will also be appointed during all phases of the project. The key duties/responsibilities of this FLO role are detailed in the Outline FLCP (REP3-016).
REP5-091.9	The National Federation of Fisherman's Organisations (NFFO), Welsh Fisherman's Association (WFA), Scottish Fishermen's Federation, Scottish Whitefish Producers Association Limited, West Coast Sea Products Ltd have raised concerns about the methodology for assessing impact of the construction of the Mona Array on their businesses. Welsh stakeholders have raised similar concerns with Welsh Government officials. In Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement, the focus seems to have been catch data rather than economic data of the likely affected fishing businesses. It does not appear that displacement effects or costs of adaptation to other fisheries has been modelled as part of the analysis either. It is therefore understandable that stakeholders have expressed low confidence in these assessments of impact.	The Applicant has recognised the importance of the fishing activity within this region and, as described in the Outline FLCP (REP3-016), has made significant commitments to facilitate co-existence with existing commercial fishing activity and to minimise disruption as far as possible. The Applicant will continue to constructively engage with the fishing community (as set out in the Outline FLCP (REP3-016)) to ensure concerns are addressed as far as reasonably practicable. The Applicant has engaged with the NFFO, WFA, Scottish Fishermen's Federation (SFF), SWFPA and other commercial fisheries stakeholders since June 2021 to understand stakeholder requirements and the potential for co-existence, 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-043). To affirm the assessment conclusions, including those related to the displacement of fishing activity as presented in Volume 2, Chapter 6: Commercial fisheries (APP-058), and to strengthen the evidence base for commercial fishing activity and offshore wind, the commitments presented within the Outline FLCP (REP3-016) are also supported by the commitment to undertake monitoring of i/VMS and landings data from the study area annually for the first five years of the operations and maintenance phase. Additionally, commercial fisheries stakeholders consider monitoring of queen scallop to also be important to confirm the accuracy of the assessment. The Applicant has acknowledged this and has therefore added a new commitment to include a scallop monitoring programme within the revised Outline FLCP at Deadline 3 (REP3-016) and the revised OIPMP at Deadline 5 (REP5-026). The Applicant

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		directs the Welsh Government Fisheries to its earlier response in REP5-091.5 above, where monitoring is discussed in greater detail. The Applicant respectfully disagrees with the Welsh Government Fisheries' assertion that Volume 2, Chapter 6: Commercial Fisheries (APP-058) focuses on catch data over economic data regarding the potentially affected commercial fisheries receptors. The assessment has comprehensively evaluated and presented the value of landed catch within the commercial fisheries study area, as detailed in Volume 6, Annex 6.1: Commercial Fisheries (APP-096). This economic information has been integrated into the assessment of impacts provided in Volume 6, Chapter 6: Commercial Fisheries (APP-058). To ensure that economic/commercial aspects were considered in the assessment, the criteria for defining magnitude of impact included specific reference to value of landings; see definition of “Low” magnitude below: *“The impact would affect an area from which a minor proportion (5-10%) of a commercial fishing receptor’s annual value of landings is caught and/or would lead to a 5-10% reduction in annual value of landings”.* For further detail, see Table 6.10 of Volume 2, Chapter 6: Commercial fisheries (APP-058). This approach acknowledges the data limitations and assumptions outlined in Table 1.1 of Volume 6, Annex 6.1 Commercial fisheries technical report (APP-097), providing a balanced and evidence-based assessment of potential economic impacts on affected fishing businesses.
REP5-091.10	The economics of sea fishing is complex. It is difficult to predict the impact of changes to variables in normal circumstances on a micro or macro level. It is also difficult to measure causation in such a dynamic economic environment. A reasonable course of action could be to monitor the impact to the costs and incomes of businesses operating in and around the Array area and commit to bespoke mitigation for consequential increased costs or reductions later. Alternatively, there could be an agreement to support fishers to adapt to other fisheries, fishing areas or aquaculture for a reasonable period.	The Applicant acknowledges the response and directs the Welsh Government Fisheries to its earlier response in REP5-091.5 above, where the Applicant’s commitment to two monitoring proposals is discussed in detail. The Applicant acknowledges the importance of supporting fishing businesses to diversify as a potential mitigation measure for the loss of marine fishing space. Firstly, however, it should be noted that the Applicant has made significant commitments in the design of the project to facilitate co-existence with existing commercial fisheries, allowing for continued fishing activity within the Mona Array Area and Offshore Export Cable Corridor and minimising loss of marine fishing space as far as practically possible, thereby avoiding the requirement for fishers to adapt to other fisheries, fishing areas or aquaculture. The Applicant highlights that these commitments are secured in the Outline FLCP (REP3-016) with the requirement for the Final FLCP (which must accord with the Outline FLCP (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.

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		In the context of supporting fishing businesses, the Applicant refers the Welsh Government fisheries to its response to Q2.5.1 of the Examining Authority's Written Questions (ExQ2) (REP5-080), which provides a detailed account of compliance with ECON_01: Sustainable Economic Growth. This policy, in part, encourages proposals to promote opportunities that support local economies. To summarise, as outlined in Section 6.8.8 of Volume 2, Chapter 6: Commercial Fisheries (APP-058), the Applicant has assessed potential supply chain opportunities for local fishing vessels and employment opportunities specific to commercial fisheries receptor groups. Furthermore, commitments made in Table 1.2 of the Outline FLCP (REP3-016), where the Applicant has made the following commitments: • Tertiary Measure (TM) 05 commits to the development and adherence to a Fisheries Liaison and Co-existence Plan in accordance with the Outline FLCP (REP3-016), which includes for the use of Offshore Fisheries Liaison Officers (OFLOs) where appropriate. Local OFLOs will be used where possible to facilitate engagement with commercial fisheries stakeholders during specific activities of the Mona Offshore Wind Project. The OFLOs will promote co-existence by communicating the project's commitments and measures to the fishing industry and providing detailed project information to aid co-existence, such as site locations for use with fish plotters. • TM 17 commits to the development and adherence to a Fisheries Liaison and Co-existence Plan in accordance with the Outline FLCP (REP3-016), which includes for the use of guard vessels where required. During the operational and maintenance phases, guard vessels will be deployed in areas with cable exposures that pose significant risks, until the risks are mitigated by burial or other protection methods. These guard vessels will ensure navigational safety, reduce gear snagging risks, and engage with commercial fisheries stakeholders to raise awareness of temporary hazards and minimise interactions with the project. Efforts will be made by the Applicant to use regional fishing vessels for guard duties where possible.
REP5-091.11	Welsh Government officials recommend the applicant considers: • Commissioning an analysis of the available survey data which may be adequate to infer an approximate baseline status of scallop stocks in the proposed development area. Officials recommend the applicant approach Bangor University's School of Ocean Sciences to consider available evidence.	The Applicant has responded to the recommendations from Welsh Government Officials below: • The Applicant directs the Welsh Government Fisheries to REP5-091.6 above, which details how Bangor University studies have been utilised to support the baseline characterisation in Volume 6, Annex 3.1: Fish and Shellfish Ecology technical report (APP-089) that informed the impact assessment within Volume 2, Chapter 3: Fish and Shellfish Ecology (APP-055). As set out above, the Applicant will consider ongoing and future work being undertaken on these species by local organisations, including regional monitoring programmes and input from key fisheries stakeholders, to ensure monitoring data are put into the context of wider patterns for these species in the region.

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	• Commissioning a monitoring programme to gather evidence of the impact of construction on scallop stocks in and around the proposed Mona Array. • Liaising with fishers to ensure all possible actions are taken give fishers confidence that it will be safe to continue to fish the area between wind turbines and in the scallop mitigation zone. It may be necessary to map snagging hazards on the seafloor covering cabling and share this with fishers. • Monitoring the ongoing impact on fishing businesses operating in and around the Array and consider reasonable mitigations based on evidence. • Whether there are opportunities for the colocation of aquaculture in the Mona Array area and what support could be provided to fishing businesses to diversify as mitigation for loss of marine fishing space.	• The Applicant directs the Welsh Government Fisheries to its earlier response in REP5-091.5 above, where the Applicant's monitoring of scallop is discussed in detail. • The Applicant directs the Welsh Government Fisheries to its earlier response in REP5-091.8 above, where potential impacts of the Mona Offshore Wind Project on navigational safety for fishing vessels and gear snagging is discussed in detail. • The Applicant directs the Welsh Government Fisheries to its earlier response in REP5-091.5 above, where the Applicant's monitoring of i/VMS data is discussed in detail. • The Applicant acknowledges the response and notes that the query in relation to co-location of aquaculture was raised by Bodorgan Marine Ltd in IP Submission (REP4-113), to which the Applicant has also responded and refers to the Welsh Government Fisheries for further details (paragraph REP4-113.5 of REP5-062). • The Applicant acknowledges the importance of supporting fishing businesses to diversify as a potential mitigation measure for the loss of marine fishing space and directs the Welsh Government Fisheries and the ExA to its earlier response in REP5-091.10 above.
REP5-091.12	Assumptions about potential impacts, and decisions on fair mitigations for those affected by the development can only reasonably be taken on the basis of relevant evidence. The activities above would involve costs to the applicant but they would be small in comparison to the likely overall budget for the project and have disproportionately large benefits in better understanding the impacts of large marine developments and supporting those affected to adapt.	The Applicant thanks the Welsh Government Fisheries for their comments and acknowledges the importance of evidence-based decision-making regarding potential impacts and mitigation measures. The Applicant notes that all specific queries and concerns raised have been addressed in detail in the responses provided above.

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