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MONA OFFSHORE WIND PROJECT

Response to JNCC D5 Submission - Offshore Benthic Environment Concerns

Deadline: 6

Application Reference: EN010137

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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,

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.

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).

Term	Meaning
Wind turbines	The wind turbine generators, including the tower, nacelle and rotor.
The Planning Inspectorate	The agency responsible for operating the planning process for NSIPs.

Acronyms

Acronym	Description
AfL	Agreement for Lease
BEIS	Department for Business, Energy and Industrial Strategy
BNG	Biodiversity net gain
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
EWG	Expert Working Group
HVAC	High Voltage Alternating Current
IEF	Important Ecological Feature
IEMA	Institute for Environmental Management and Assessment
ISAA	Information to support the Appropriate Assessment
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
NBB	Net Benefits for Biodiversity
NRW	Natural Resources Wales
NSIP	Nationally Significant Infrastructure Project
NTS	Non-Technical Summary
OSP	Offshore Substation Platform
PDE	Project Design Envelope
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
POI	Point of Interconnection
SAC	Special Area of Conservation
SoCC	Statement of Community Consultation
SPA	Special Protection Area
TCE	The Crown Estate
WTW	Wildlife Trust Wales
TWT	The Wildlife Trusts

Units

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

1 RESPONSE TO JNCC D5 SUBMISSION - OFFSHORE BENTHIC ENVIRONMENT CONCERNS

1.1 Introduction

1.1.1.1 The Applicant has responded to JNCC's Deadline 5 submission "Outstanding concern for the offshore benthic environment" below.

2 Response To JNCC Deadline 5 Submission - Outstanding Concerns for the Offshore Benthic Environment

Table 2.1: REP5-094 - JNCC

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-094.1	**1 Marine decommissioning** The below response on marine decommissioning relates to submissions from: – The Applicant's Deadline 3 submission 'Response to JNCC D2 Submission' document (REP3-036; responses REP2-097.68, REP2-097.69, REP2-097.75, REP2-097.78, and REP2-097.80) – The Applicant's Deadline 4 submission 'Response to Joint Nature Conservation Committee Deadline 3 Submission' (REP4-048; responses REP3-086.85, REP3-086.86, REP3-086.87, REP3-086.94, REP3-086.95, REP3-086.98, and REP3-086.101) Decommissioning activities have not been fully considered. The recently published guidelines by Offshore Energies UK (OEUK) for 'Designing for Decommissioning of Offshore Wind' states that: "*Assets should be designed to be decommissioned with a technology available at the time of commissioning*" The Examining Authority for Five Estuaries Offshore Wind Farm Limited (project EN010115) has requested from the Applicant that: "*Decommissioning is required to be assessed in order that the Examining Authority (ExA) and Secretary of State can have regard to the likely significant effects of the whole project over its lifecycle in making a recommendation and determination.*" This can be achieved by following the OEUK 'Designing for Decommissioning of Offshore Wind' guidelines and assessing decommissioning based on available technologies now and not in the future. JNCC consider that without assessing decommissioning	As outlined in the Applicant's Response to the JNCC Deadline 2 Submission (REP3-036) (see row REP2-097.68), the Applicant has undertaken a suitably robust assessment of the decommissioning phase of the Mona Offshore Wind Project for benthic subtidal and intertidal ecology in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) in accordance with industry good practice with respect to Environmental Impact Assessments (CIEEM, 2022; OSPAR, 2008). For some impact pathways (e.g. temporary habitat loss/disturbance), the maximum design scenario (MDS) relevant to decommissioning is the removal of offshore infrastructure (e.g. cables and foundations). This decommissioning option would not have been included in the project description (Volume 1, Chapter 2: Project description (APP-050)) if the Applicant did not think it was feasible. The Applicant is therefore confident that all infrastructure could theoretically be removed based on current-day technology in accordance with current guidance (e.g. Offshore Energies UK 'Designing for Decommissioning of Offshore Wind (OEUK, 2024)). However, as outlined in Volume 1, Chapter 2: Project description (APP-050), the project position remains that offshore cables and cable and scour protection ought to be left *in situ*. Nonetheless, removal has been assessed in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), where this represents the MDS and potential methods of offshore infrastructure removal are described in section 3.12 of Volume 1, Chapter 2: Project description (APP-050). This approach accords with NRW (A)'s position (as set out in their Written Representation (REP1-056)) that all decommissioning options (maintain, full removal and partial removal) should be retained within offshore wind project decommissioning plans so that these can "*be assessed and refined closed to the time of decommissioning itself in consultation with NRW*". As outlined in paragraph 3.13.1.1 of Volume 1, Chapter 3: Project description (APP-050), no offshore decommissioning works will take place until a written decommissioning programme has been approved by the Secretary of State for the Department for Energy Security and Net Zero (formerly the Department for BEIS), a draft of which will be submitted prior to the construction of the Mona Offshore Wind

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
	now, it is not possible to determine the likely significant effects of the project as a whole for the offshore environment.	Project. The Applicant intends to secure licensable decommissioning activities through a separate standalone marine licence (see Table 1.1 of the Marine Licence Principles Document (J9 F06)). The scope of the decommissioning works would be determined by the relevant legislation and guidance at that time.
REP5-094.2	**2 Assessing impacts to 'seapen and burrowing megafauna communities' Important Ecological Features (IEF)'** 2.1 Magnitude of effect The below response on magnitude of effect relates to submissions from: – The Applicant's Deadline 3 submission 'Response to JNCC D2 Submission' document (REP3-036; responses REP2-097.67, REP2-097.83) – The Applicant's Deadline 4 submission, 'Hearing Summary (ISH4) Offshore Matters' (REP4-034; ID 3c) – The Applicant's Deadline 4 submission, 'Response to October Hearing Action Points' (REP4-036; reference HAP_ISH4_05) – The Applicant's Deadline 4 submission 'Response to Joint Nature Conservation Committee Deadline 3 Submission' (REP4-048; responses REP3-086.84, REP3-086.104) – The Applicant's Deadline 4 submission, 'Response to JNCC ExQ1 Responses' (REP4-062; reference REP3-084.5) JNCC welcomes the approach detailed in the Applicant's Deadline 4 submission, 'Response to JNCC ExQ1 Responses' (REP4-062; reference REP3-084.5), to combine the long-term habitat loss and temporary habitat loss/disturbance areas as a more realistic assessment in terms of geographic scale for the 'seapen and burrowing megafauna communities' IEF. We would welcome this addition of 13.86% of impacted area within the final version of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), to ensure transparency as well as ease of access and reduced confusion for future projects referring to this Application. JNCC would	The Applicant welcomes the Joint Nature Conservation Committee (JNCC)'s agreement that the magnitude of the impact on the seapens and burrowing megafauna communities Important Ecological Feature (IEF) is low.

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	agree with the Applicant's assessment of low magnitude of impact for this updated impact area.	
REP5-094.3	2.2 Sensitivity of the 'seapen and burrowing megafauna communities' IEF The below response on sensitivity of the 'seapen and burrowing megafauna communities' IEF relates to submissions from: – The Applicant's Deadline 3 submission 'Response to JNCC D2 Submission' document (REP3-036; responses REP2-097.66, REP2-097.81) – The Applicant's Deadline 4 submission 'Response to Joint Nature Conservation Committee Deadline 3 Submission' (REP4-048; responses REP3-086.84, REP3-086.102) – The Applicant's Deadline 4 submission, 'Response to JNCC ExQ1 Responses' (REP4-062; reference REP3-084.5) JNCC do not consider the MarESA sensitivities as a guide to "tailoring" the sensitivities of identified habitats. MarESA provides peer-reviewed sensitivities based on comprehensive and rigorous reviews of habitat-specific sensitivities and pressures from the scientific literature. JNCC would not expect to see changes made to the sensitivities reported by MarESA. JNCC, therefore welcomes the Applicant's correction of the MarESA sensitivity to 'High', as detailed in REP4-062 (reference REP3-084.5), and would expect to see this corrected sensitivity reflected throughout the final documentation, including Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054). JNCC takes a worst-case scenario approach and where a range is presented, we would expect to see the higher value considered. JNCC acknowledges that there has been a lack of seapens identified from surveys carried out to date. However, the Applicant has stated, as a precaution, that the 'seapen and burrowing megafauna communities' IEF is present. Therefore, it is appropriate that this habitat is assessed fully and would justify assessing the significance of effect as 'moderate' when a range is given as 'minor to moderate', as previously detailed by JNCC's Deadline 2 submission (REP3-036,	The Applicant maintains that the assessment of the seapens and burrowing megafauna communities IEF in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) and the conclusion of minor adverse significance is sufficiently precautionary for the habitat present within the Mona Array Area. The data from the 2021 site-specific benthic surveys concluded that, on the basis of a number of criteria considered (which is outlined in full in section 1.7.6 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054)) and not solely the lack of seapens, the areas in which burrows were observed had only a **negligible resemblance** to the 'seapens and burrowing megafauna communities' habitat. This habitat was, therefore, included as an IEF and assessed on a highly precautionary basis. The Applicant note that this habitat was not recorded in the 2022 site-specific benthic surveys but was still included in the assessment as an IEF on a precautionary basis. The Applicant welcomes the JNCC's agreement in REP5-094.2 above that the magnitude of the impact from temporary and long term habitat loss on the seapens and burrowing megafauna communities IEF (i.e. 13.89% of the area encompassed by the Mona Array Area and Mona Offshore Cable Corridor alone as outlined in the Applicant's response to the JNCC's ExQ1 Responses (REP3-084.5 in REP4-062) is low. The Applicant maintains that tailoring the sensitivity of the seapens and burrowing megafauna communities IEF from 'high' (as per the Marine Evidence based Sensitivity Assessment (MarESA); Hill *et al*. (2023)) to 'medium' is appropriate for the communities identified in the benthic ecology site-specific survey of the Mona Array Area and zone if influence (i.e. those bearing a negligible resemblance to the seapens and burrowing megafauna communities habitat and given the absence of seapens). This is on the basis that the high sensitivity rating of this habitat in the MarESA is primarily driven by the fragile nature of seapens as an epifaunal species. A low magnitude of impact together with a medium sensitivity of receptor, as outlined in Table 2.17 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), may result in an effect of minor or moderate significance. In accordance with standard approaches to EIA methodology, the final significance is based upon the topic expert's professional judgement as to which outcome delineates the most likely effect. For the reasons outlined in full in the Applicant's

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	response REP2-097.66). JNCC therefore does not agree with the Applicant's conclusion of a minor significance of effect, as detailed in the Applicant's Deadline 4 submission, 'Response to JNCC ExQ1 Responses' (REP4-062; reference REP3-084.5), and would consider the significance of effect to be 'moderate' for the 'seapen and burrowing megafauna communities' IEF.	response to the JNCC's ExQ1 Responses (REP3-084.5 in REP4-062 and summarised below), the Applicant maintains that it is confident that the effect on the seapens and burrowing megafauna communities IEF will be no greater than minor adverse significance. The effect is, therefore, not significant in Environmental Impact Assessment (EIA) terms.
		
		As outlined in the Applicant's response to the JNCC's ExQ1 Responses (REP3-084.5 in REP4-062), even if, as the JNCC requests, a sensitivity of high were to be applied to the seapens and burrowing megafauna communities IEF, according to the matrix in Table 2.17 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), the range of significance would remain as minor to moderate. However, the Applicant would maintain that the significance of effect would remain minor adverse, and so not significant in EIA terms.
		
		The Applicant does not agree that to adopt a 'worst-case scenario approach' means taking the higher end of a range of significance (i.e. automatically selecting moderate when the option is a range of minor to moderate), and nor is this consistent with the EIA methodology outlined in section 5.3.6 of Volume 1, Chapter 5: Environmental Impact Assessment methodology (APP-052). In summary, the Applicant considers that a sufficiently precautionary approach has been adopted with respect to the assessment of the seapens and burrowing megafauna communities IEF for the following key reasons:
		
		• The habitat present within the Mona Array Area bore a negligible resemblance to the OSPAR habitat for the following reasons:
		  ○ The maximum burrow density recorded was highly precautionary because total burrows per image were not recorded, rather burrows were assigned a range (i.e. 1 – 5, 6 – 10 etc.) and, to determine the maximum burrow density, the top end of the range bracket was used to obtain the maximum total number of burrows and from that the density then calculated.
		  ○ The majority of burrows were small (49% within the 0 – 1 cm size range category).
		  ○ Gravelly sediments predominated which do not typically support this habitat.

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		○ Burrowing fauna not associated with the 'seapens and burrowing megafauna communities' habitat locations were observed including *Ceriantharia* and *Ensis*. ○ There was no evidence of any species associated with 'seapens and burrowing megafauna communities' habitat. ○ No seapens were observed during the surveys. • The habitat is a broadscale habitat recorded across the east Irish Sea. • The Applicant committed to a number of project refinements post the Preliminary Environmental Information Report (PEIR), which are detailed in sections 4.10 and 4.11 of the Applicant's Response to s51 Advice - F1.4 Site Selection and Consideration of Alternatives (AS-016), to reduce the impact to benthic receptors. • Impacts to the habitat from temporary habitat loss/disturbance will be intermittent over the four year construction phase. • The predicted recovery of the key component of the community recorded in the Mona Array Area (i.e. the burrowing megafauna component of the habitat) to temporary habitat disturbance is medium (i.e. recovery in two to 10 years) and so the habitat, as recorded, is predicted to recover. On the basis of the information summarised above, and the assessments detailed in full in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), the Applicant considers that its assessment of habitat loss/disturbance on the seapens and burrowing megafauna IEF, and conclusion that the effects will be no greater than minor adverse significance, is sufficiently robust and representative of a reasonable worst case scenario.
REP5-094.4	**3 Maximum Design Scenario** The below response on the maximum design scenario relates to submissions from: – The Applicant's Deadline 3 submission 'Response to JNCC D2 Submission' (REP3-036; response REP2-097.72 and REP2-097.77) – The Applicant's Deadline 4 submission 'Response to Joint Nature Conservation Committee Deadline 3 Submission'	The Applicant is pleased that the JNCC have found the additional information provided by the Applicant on the Maximum Design Scenario (MDS) useful. The Applicant confirms that there are no errors in the information provided by the Applicant in their Deadline 3 submission, 'Response to JNCC D2 Submission' (REP3-036; response REP2-097.72) and that the difference highlighted by the JNCC (i.e. 591,552 m^2 compared to the higher and more precautionary value of 591,576 m^2 reported by the Applicant in REP2-097.72) is due to numerical rounding of values used in the calculations.

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	(REP4-048; responses REP3-086.90, REP3-086.91, REP3-086.96) In the Applicant's Deadline 3 submission 'Response to JNCC D2 Submission' (REP3-036; response REP2-097.72), the Applicant provided an explanation to the Maximum Design Scenario including a table detailing Option 1 and Option 2 for suction bucket 4-legged jacket foundations. JNCC found this to be very useful and clear, providing much needed transparency in the Applicant's calculations of the maximum design scenario, however, further clarity is still required. Without this level of detail, breakdown of figures and accurate calculations within the final documentation, it is not possible to check whether the Applicant has calculated the total seabed footprint for the Mona Offshore Wind Project correctly or not. To emphasise this point, we note that, despite the breakdown of figures provided in the table, the total seabed footprint for the Mona Offshore Wind Project for Option 1 listed within this example table seems to be incorrect and JNCC believe that the value should be 591,552m2. This highlights the need for the Applicant to provide more transparency in their calculations of the maximum design scenario to allow for increased confidence in subsequent environmental assessments and impacts. JNCC would therefore request that similar tables are provided and incorporated into the final documentation, including Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), for all foundation types (see our original comment for which tables this would apply to; REP3-036, response REP2-097.72, REP2-097.77 and REP4-048, responses REP3-086.90, REP3-086.96) so we can be confident that the values which the Applicant is quoting are correct. Similarly, and with regards the maximum design scenario for Offshore Substation Platform (OSP) foundation sizes (as commented on in REP3-036; response REP2-097.77), JNCC would like to see these as updated table information within the final documentation, including Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), to allow for complete transparency.	The examples provided by the Applicant in their response to the JNCC Deadline 2 Submission (REP3-036; response REP2-097.77) as well as the Applicant's Deadline 3 submission 'Response to JNCC D2 Submission' (REP3-036; response REP2-097.72) were submitted to provide the JNCC with greater clarity on the methodology for how the MDS was calculated, using long term habitat loss as an example. Other than the JNCC, no other interested party, including NRW (A), have raised concerns regarding the MDS defined in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054). The Applicant would highlight that it is the Applicant's responsibility to satisfy themselves that the Mona Offshore Wind Project can be constructed within the parameters specified within the Development Consent Order (DCO), and they acknowledge that they will need to adhere to those values and the MDSs assessed within the EIA. The Applicant presented the MDS to the JNCC during pre-application consultation via the Benthic ecology, fish and shellfish and physical process Expert Working Group (EWG) (Appendix B of the Technical Engagement Plan Appendices A-E (APP-042)) and no queries were raised. The Applicant has since responded diligently to the concerns raised by the JNCC during examination and, in doing so, no inaccuracies in the MDS have been identified. The Applicant is, therefore, confident that the values specified in the DCO are correct and accurate and will not be exceeded and that the MDS for all impact pathways is clear and has been correctly calculated and assessed in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054). The Applicant does not therefore intend to provide any further breakdown of the MDSs or update Volume 2, Chapter 2: Benthic, subtidal and intertidal ecology (APP-054) with this information.

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REP5-094.5	**4 Sandwave clearance** The below response on offshore (past 12nm) sandwave clearance relates to submissions from: – The Applicant's Deadline 3 submission 'Response to JNCC D2 Submission' document (REP3-036; response REP2-097.65) – The Applicant's Deadline 4 submission 'Response to Joint Nature Conservation Committee Deadline 3 Submission' (REP4-048; response REP3-086.85) In the Applicant's Deadline 3 submission 'Response to JNCC D2 Submission' document (REP3-036; response REP2-097.65), the Applicant provided an indicative estimation to the quantity of sandwave clearance that may occur in the offshore marine environment (beyond 12nm). JNCC are content with these indicative values estimated at approximately 4,838,400m2. This is also linked with the Applicant's Deadline 4 submission 'Response to Joint Nature Conservation Committee Deadline 3 Submission' (REP4-048; response REP3-086.85). JNCC consider this matter to be resolved.	The Applicant welcomes confirmation from the JNCC that the matter of sandwave clearance in the offshore environment (beyond 12 nm) is now resolved.

3 REFERENCES

CIEEM (2022) Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine, Version 1.2, – Updated April 2022, https://cieem.net/wp-content/uploads/2018/08/ECIA-Guidelines-2018-Terrestrial-Freshwater-Coastal-and-Marine-V1.2-April-22-Compressed.pdf, Accessed December 2024.

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